



Colne Town Council Response to the Consultation for Calderdale Energy Park

This response draws on the work of the Walshaw Turbines Research Group (WTRG) and the Peatland Alliance. The Town Council offers thanks to them for bringing many important matters that pertain to our town to light.

Colne Town Council **strongly objects** to this proposed development and **strongly objects** to the conduct of the scoping and consultation exercises on many grounds, while acknowledging the 10 new jobs that may be created when the Energy Park is operational and the estimated 240 MW (maximum) generated from its 34 massive wind turbines.

Our objection is on the following grounds:

1. Not being consulted in the previous consultations that has led us to make a challenge under the Gunning Principles as we were not made aware of the Aggregate Transportation.
2. The additional traffic and pollution will lead to adverse economic and health impacts in Colne.
3. The adverse impact on our mainly Victorian solid stone constructed buildings, many of which are built close to, or directly adjacent to, the chosen route.
4. The negative impact on the 17 protected viewpoints in the Colne Neighbourhood Plan
5. The lack of expertise of the developer and the chequered business past of the founder/Chairman leading to a lack of Due Diligence.
6. The numerous errors in the PEIR, leading to lack of confidence in the information presented
7. The industrialisation of a wilderness on our doorstep.
8. The negative impact on rare, red-listed birds and ecology.
9. The negative impact on the peat, plus the danger of peat bursts and peat slides.
10. The negative impact on tourism and our literary heritage.

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The Aggregate Problem

The “aggregate problem” in West Yorkshire and Lancashire is that if the local gritstone is crushed for construction, the aggregates are too weak and porous for making roadstone or concrete. British Geological Survey Sheet 77 (Huddersfield) from 2005, which is available free online, states:

“In general, the sandstones are too weak, porous, and susceptible to frost damage for them to be used for good quality roadstone or concrete aggregate. They may be used in road construction below the level of possible frost damage and for some of the less demanding concrete applications.”

Limestone aggregates from North Yorkshire and Derbyshire are usually imported instead, but limestone cannot be used on the acid bog of Walshaw Moor. The problem is known to every reputable builder in West Yorkshire and Lancashire: local aggregates turn to sand after rain and blow away. Therefore, the tracks of Calderdale Energy Park (“CEP”) must be constructed from granite (or other non-calcareous rock) quarried outside Yorkshire and Lancashire, and imported from south or west of the site, on the M65 and through Colne and Laneshaw Bridge.

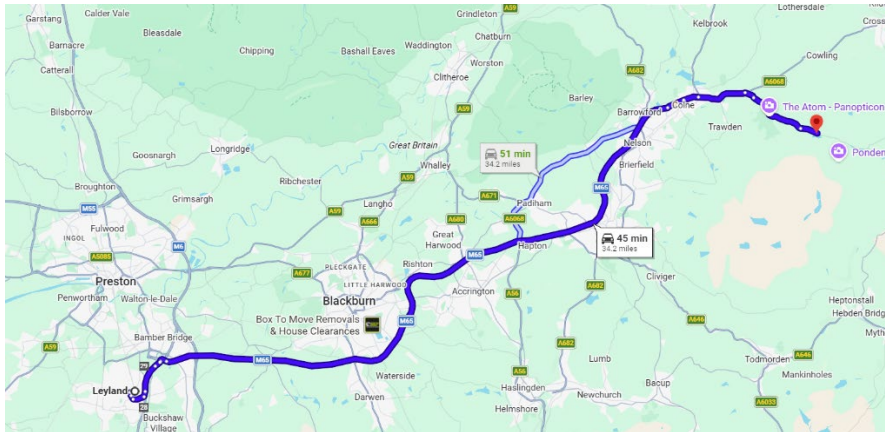
Like any wind farm of its size, CEP requires hundreds of thousands of tonnes of crushed rock (aggregate) to build the access tracks, crane hard standings and compounds, and to make the concrete for the turbine foundations. In Scottish and Welsh wind farms, once the first borrow pit (on-site quarry) is reached, the rest of the aggregate is usually obtained on site. This cannot happen in the CEP.

Why were Colne and Laneshaw Bridge not consulted on this matter during the four-year gestation of CEP up to the publication of the PEIR?

The imported hard stone requirement is specified in Ch 24 Materials and Waste as 196,100 m³ of newly quarried hard stone (70%) and 83,900 m³ of recycled railway ballast (30%).¹ This total is 280,000 m³, matching the figure given in Appendix 14-1 Table 8, where the equivalent mass is given as 616,000 tonnes, requiring the stated 30,800 inbound HGV trips and 61,600 HGV journeys in total. When divided by 16 months, these hard stone deliveries become the repeated 3,850 monthly journeys of 14-1 Table 10.

The onward journey by road from Leyland to the CEP access is shown below.

¹ PEIR Table 22-13



This route is all on the M65 until Colne, where it enters the town at the Boundary Mill roundabout. Thereafter the route is through Colne and Laneshaw Bridge, just beyond which it crosses farmland on a new access track towards CEP.

The “Horton” Rail Head

The alternative that is hinted at in the PEIR is the use of the rail head at Horton-in-Ribblesdale. However, the stone handling at Horton-in-Ribblesdale on the Settle-Carlisle railway is consented and configured for export only. Horton is not a receiving depot for aggregates; its purpose is the export of Horton limestone by rail. The Network Rail announcement of the reopening of rail export on 15th July 2025 from Horton-in-Ribblesdale says:

“The re-linked rail terminal will move about 1,600 tonnes of limestone from the quarry every weekday on the railway instead of on lorries. This will help save more than 507 tonnes of CO₂ each year and keep the roads clearer. Plus, the rail link will help boost the local economy by safeguarding jobs at the quarry. The local government plans to reduce road haulage through the region – so the quarry might have had to close without the link. And the link will help the building industry that relies on much of the stone coming from the quarry.”

Objective D4 of the YDNP Management Plan 2019-2024 was:

Create a railhead at Horton Quarry and continue other measures to reduce road haulage limits from quarries by 50% compared to 2011.

The stated purpose of the facilities at Horton is thus to reduce export by lorry through the Dales. It is entirely counter to this purpose to import alien hard stone to Horton by rail and then export it by lorry. There is no unloading equipment, nor stockpile pads nor HGV aprons at Horton-in-Ribblesdale. We can therefore discount the likelihood of the Horton-in Ribblesdale rail head being used to construct the proposed CEP.

Why Didn’t We Know About the “Aggregate Problem” Sooner?

The problem with the on-site aggregates should have been identified by Calderdale Wind Farm Ltd (“CWF Ltd”) during due diligence by the company’s founder Christopher Wilson (now Executive Chairman) and his investor Dr Ghazi Osman (Sole Director), whose doctorate is in Civil Engineering, in discussion with the owner Richard Bannister, whose understanding of the aggregate problem on Walshaw Moor is as complete as anyone, given his gamekeepers scrupulously use blue granite on the tracks on Walshaw Moor and not limestone as it is a bog poison. The agreement between

Christopher Wilson and Richard Bannister was signed on 11th November 2011 (Land Registry The Waste WYK118799).

Due diligence was necessary in order to assess the alternative sites to Walshaw Moor that CWF Ltd should have considered, because Walshaw Moor is part of the South Pennines Special Area of Conservation (SAC) for its peatland habitats, and Special Protection Area (SPA) for its red-listed birds and consideration of alternatives is vital under the habitats regulations.

The aggregate problem on Walshaw Moor should have been flagged up during this process of due diligence, and the process should be explicitly documented. No contemporary documents detailing any process of due diligence in site selection in 2022 have been published by CWF Ltd.

Understanding the aggregate problem on Walshaw Moor and in wider Yorkshire and Lancashire would have taken Mr Wilson and Dr Osman only a few minutes in November 2021, either by consulting any one of the sources detailed below, or simply by asking Richard Bannister or his Head Gamekeeper how they made the Estate tracks.

We know that no due diligence about aggregates was conducted by CWF Ltd because of incorrect statements about Calderdale geology and aggregate sources made in the September 2023 Scoping Report for Calderdale Wind Farm:

“3.6. Borrow Pits: The Proposed Development would require crushed stone to construct new tracks and, where necessary, improve the existing tracks on site. The crushed stone will also be required to create the hardstanding areas for cranes and lay the foundations for turbines. Suitable volumes of stone and aggregate shall be sourced from onsite borrow pits.

12.2.1 There are likely to be several route options from yet to be identified material supply centres (e.g., quarries). There are several quarries located to the east of the site which means, depending on the site access and route, the traffic will travel on the A629 before travelling on either the A6068, A646 and A671 and subsequently minor roads to the selected Site Entrance.”

These two paragraphs are **all** that is said about the aggregate sources for CWF in the September 2023 Scoping Report.

The quarries “to the east of the site” accessed by the stated roads would be those in the Halifax area that produce high-quality building stone, and these could not have supplied the strong aggregates required for road stone and concrete. Had CWF Ltd assessed the geology, by considering the BGS map, at any time between February 2022 and September 2023, they would have immediately discovered their aggregate problem. The authors of the 2023 Scoping Report also did not look at the BGS map and made the assumption that the onsite rock might be suitable. The closest relevant quarries east of the site are in Latvia!

The aggregate problem, as it pertained directly to Walshaw Moor, entered the public domain on 2nd May 2024 in an article written by Nick MacKinnon and published by Mark Avery, the former Conservation Director of the RSPB, who has had intensive involvement with Walshaw Moor from 2002, when Richard Bannister bought the estate from Lord Savile.

The article was part of a series. The aim of the Bedlam Knoll edition was to find the first borrow pit. It was then that MacKinnon read and published the various sources given above, which describe the weakness for construction of the aggregates won in borrow pits or from “quarries to the east.”

MacKinnon always sent the WTRG analyses to CWF Ltd, invariably receiving an automatic reply, until on 18th September 2024 CWF Ltd replied to an email sent to them by MacKinnon, which asked questions about aggregates and electrical connection.

The questions were:

1] *Why does the Scoping Report (2023) mention a tiny scrap of flint found in Walshaw Dean, but not the annual West Yorkshire aggregate assessments, which always state that the local sandstone is too weak and porous for road stone or concrete?*

2] *If the problem with the onsite rock was in fact known to Natural Power [then consultants to CWF Ltd] and WWRE [the shell company owned by Christopher Wilson] why did they choose not to mention it?*

3] *Which limestone area will supply the aggregate for CWF Ltd if the onsite rock is too weak and porous for road building or concrete?*

As CWF Ltd did not engage, MacKinnon then asked his MP, Robbie Moore (Keighley & Ilkley), to ask the same questions, which he did in a letter from the House of Commons dated 12th October 2024. CWF Ltd has never replied to this letter. Within a fortnight, the CWF proposal had collapsed, and all the information on the website was removed, leaving only the front page, a photograph of a wind farm that was certainly neither in Calderdale, nor on protected peatland.

A revised proposal, Calderdale Energy Park (CEP), was launched on 29th April 2025.

There was no mention of the aggregate problem in any of the publications of CWF Ltd for the Non-statutory Consultation which ran until 6th June 2025. Their published position on aggregates, as far as the people of Colne were concerned, remained that of the Scoping Report of 2023, which was that the aggregates would be won from borrow pits supplemented by quarries to the east of the site. Since the onsite geology is identical to the geology to the east, there would then be no need for imported aggregates once the first borrow pit was reached, so as far as the people of Colne could surmise, if CEP would be built, like most wind farms in Wales and Scotland, almost entirely from onsite rock.

This point is important. At the Non-statutory Consultation, the last word on aggregates from CWF Ltd was “borrow pits and quarries to the east”. Had CWF Ltd known then that the proposal would in fact require the import of hundreds of thousands of tons of granite through the densely settled valleys, it was their duty to say so, so that the communities could respond to the matter. The absence of this information at the Non-statutory Consultation was either incompetence or deception.

The people of Colne should have been able to give ‘intelligent consideration’ to the proposal under the Gunning Principles for a public consultation (Gunning 2 in particular) between 29th April and 6th June 2025. On p 13 of the Consultation Brochure (29th April 2025) they would have found confirmation of continuity between CWF, the 65-turbine proposal, and CEP the 41-turbine proposal.

Reading the materials supplied by CWF Ltd by May 2025, including the geological information in the CWF Scoping Report of September 2023, the people of Colne would have found that CWF Ltd proposed to build CEP using onsite aggregates supplemented by “quarries to the east”.

The people of Colne would have been justified in assuming continuity of geological information from February 2022 through to March 2026. Data found by TNEI in February 2022 is still in use even in the PEIR for CEP published in April 2026. Although CWF has been described by Christian Egal as “worse

than useless” it is always regarded by CWF Ltd as an iteration of the design, and this was stated (p 13) in the Consultation Brochure for the Non-statutory Consultation.

During the Non-statutory Consultation, the people of Colne could see that there was a possibility that the turbine components (the Abnormal Indivisible Loads (“AIL”)) might pass through their town (Option B). The alternative was a route via Halifax (Option A). There was no indication at all in the Consultation Brochure that Colne might also be a route for the delivery of hundreds of thousands of tonnes of road stone and concrete aggregates that could not be quarried on site, nor quarried to the east of the site, as the Scoping Report 2023 had stated. In any case, “Option B” is clearly the secondary, lesser option to “Option A”. The word “aggregate” does not appear in any of the Non-statutory Consultation documents. The only information about aggregate source was in the CWF Scoping Report (September 2023) and it said, “onsite borrow pits and quarries to the east of the site”. The AIL deliveries overnight (then 41, now 34 turbine convoys) are far less of an imposition on Colne than the stone deliveries by day, all day, for 16 months. Colne was consulted about the possibility of a few AIL convoys which would not (by definition) be injected into the notorious Boundary Mill/Vivary Way/North Valley Road traffic jam, but not about the potentially vast number of stone deliveries that would be injected into that notorious traffic jam. There have, over decades, been plans to construct a Colne bypass to obviate the slow crawl along Colne’s North Valley or up its High Street.

Alison Sidgwick was the consultant who had approved the 2023 CWF Scoping Report with its “quarries to the east”; she was, by this stage, a lead consultant for CEP; and she was at the Oxenhope public consultation on 17th May 2025 with colleague, Sue Birnie. The following exchange with Nick MacKinnon has been in the public domain since 22nd May 2025:

NM: *“What are the tracks and foundations going to be made of?”*

SB: *“What do you mean?”*

NM: *“Wind farm tracks are made of crushed rock, and so is the concrete for foundations. The scoping report says the rock may come from onsite borrow pits and this will save the environmental costs of importing stone.”*

AS: *“Yes! There will be borrow pits!”*

NM: *“But the onsite rock is too weak, porous and susceptible to frost to be used as a roadstone or for technical concrete.”*

SB: *“That’s just your opinion.”*

NM: *“It is the opinion of the five West Yorkshire Councils who publish an annual Aggregate Assessment and have done so since 2012. The problem with West Yorkshire aggregate is an economic imperative for the councils. The facts about weakness, porosity and susceptibility to frost are also written on the notes of the British Geological Survey map to the area. Has nobody at CWF Ltd looked at the aggregate assessments or the BGS map?”*

SB *“I don’t know. We don’t have to check the rock yet.”*

NM: *“This is a public consultation held under Gunning Principles and the public must be able to give “intelligent consideration” to your proposals. I am a member of the public who cannot do any solid calculations about the stone deliveries until you suggest where the aggregate is coming from, so I cannot give “intelligent consideration” even to a matter as simple as what you are going to build CEP from.”*

NM: *“So you have completed a “careful design process” without doing anything at all to establish where the rock is coming from.”*

SB: *“It’s just rock. We don’t have to consider rock at this stage of the proposal.”*

NM: *“But for some people the vast amount of rock that must be delivered will be the primary effect on them, and they cannot give “intelligent consideration” to the proposals without knowing if rock is being imported and from where.”*

No conversation of this kind could happen in Colne because no non-statutory public consultation event was held in Colne. SB was the applicant for the 200 MW Stornoway Wind Farm so her blasé and dismissive attitude to the questions about aggregates is poor.

It was now clear that the road stone could not be limestone as it would react with the acid environment and produce mobile bicarbonate which is poisonous to sphagnum. The simplest evidence for this was the Walshaw Moor Estate Catchment Restoration 2017-2042 Plan, signed by Richard Bannister and Natural England, which must have featured in the due diligence carried out in February 2022 since it describes what might be expected of any landowner. “8.1.6 Aggregate used on tracks will be inert materials.” This information at least should have been discovered during due diligence in February 2022 in negotiations between the owner of Walshaw Moor, Richard Bannister, Mr Wilson and Dr Osman.

CWF Ltd must have had acquired some understanding of the aggregate problem by 21st May 2025, because a question on aggregates was sent in by WTRG at the Webinar, selected for use by chair, Kevin Whitmore of Cavendish Consulting, (43:44) and answered by consultant, Donald Mackay.

“As you can imagine, a project of this scale requires a large quantity of aggregate to be brought onto the site for topping off the roads and for the aggregate requirement for making concrete which will probably be batched on site. The material ... the naturally occurring material we have isn’t the best quality for construction, so we will need to strengthen the roads by bringing in aggregate from outside the site. Given the location of the site, it’s fair to assume that the aggregates will come from a number of different sources that will depend on geography and onsite requirements. To be able to manage that kind of quantity of traffic the aggregate sources will be looked at as part of that overall transport assessment. We haven’t identified specific quarries at the moment, but as part of the design process once we have identified the quantities that are required, we will look at it in a lot more detail as part of that traffic assessment.”

Until Mackay’s remark, the published position of CWF Ltd on the rock had been borrow pits supplemented by quarries in the east. The people of Colne did not need to “imagine the aggregate” or its route to site: it had been specified by CWF Ltd in writing as onsite gritstone supplemented by Halifax gritstone. If they are on suitable sites, wind farm “projects of this scale” do not usually require “a large quantity of aggregate to be brought onto the site”.

In addition, the traffic flow tables in PEIR Appendix 14-1 depend on an assumption (the Horton rail head) stated only in a footnote (Materials and Waste 22.5.9 n 48) which is not justified in the text and which, if consented, would be highly controversial. The local authorities who represent people affected by the consequences of this “Horton footnote” have not been consulted since the inception of CEP in November 2021, nor does footnote 48 constitute consultation. The use of the Horton rail head for the purposes described runs exactly counter to the consented, and celebrated, purposes of the Horton Quarry rail link.

Although they might have used their imaginations, as Donald Mackay suggested, the only way for people in Colne to understand the consequences of the proposal for their town was to have seen the webinar and wonder if the stone might come their way on the same route as the turbine components. **No written confirmation of aggregate weakness was made by CWF Ltd during the Non-statutory Consultation and nobody in Colne could be expected to give this aspect of the proposal “intelligent consideration” under Gunning 2 because nobody had been given the key information, except as a verbal response of a single consultant.**

Horton as an alternative at all seems to be designed only to confuse the consultees. Yet the traffic assessment in the PEIR is entirely predicated on Horton being the rail head for 70% of the hard stone. Since the 30-70 split between Leyland and Horton is the same as the 30-70 split between the recycled railway ballast and the new-quarried hard stone, it may be that CWF Ltd’s assumption is to send the ballast to Leyland and the new stone to Horton. **However, if the plan is that developed, it should be explicit in the PEIR, because there has been no previous consultation about the requirement for, and transport of, this vast quantity of hard stone.**

The assumptions of Table 10 are that 70% of the hard stone will be delivered by rail to Horton rail head, which is not a receiving depot and where the local authorities have not been consulted. Without a credible justification of Horton as a hard stone rail head, the traffic analysis in Chapter 12 is worthless. Since we have examined the relative suitability of Horton and CWF Ltd has not, we are justified in assuming that, in fact, all the hard stone aggregates must be delivered only to the Leyland rail head, then by M65 to the roundabout outside Boundary Mill, Colne. **If that is the case, the Statutory Consultation has been prima facie unlawful under the Gunning Principles.**

The people of Colne thus had no opportunity to shape the proposal during the Non-statutory Consultation as far as a key impact on their community was concerned: the unimaginable hundreds of thousands of tonnes of rock that CWF Ltd had finally admitted (but only verbally) would have to be imported and could not be limestone, so would not originate north of the site. From 21st May 2025 CWF Ltd finally had the clear sight of the aggregates that they should have attained at site-alternatives due diligence in November 2021. **They now had an opportunity to make the position clear to the people of Colne in the Logika Scoping Report of September 2025, but they had already, prima facie, failed to run a lawful non-statutory consultation under Gunning.** Either through incompetence or deception, they had not informed Colne about the “aggregate problem”.

The next opportunity for the people of Colne, their Council and their MP, Jonathan Hinder, to shape the proposal as far as the stone deliveries were concerned, might have been the 29 days given to Statutory Consultees to respond to the CEP Scoping Report compiled by Logika. **There is no indication of the “aggregate problem” in the Scoping Report 2025.**

It would have been impossible for the people of Colne understand what was coming, because of the extraordinary confusion in the Access and Transport section of the CEP Scoping Report, unprecedented in any Scoping Report for an onshore wind NSIP. It is only now clear what underlying assumption was causing the scrambled Scoping Report account of aggregate transport: the report assumed that hard stone could be imported into the dales by rail and then exported by lorry. No consultee could possibly have realised that this absurd and unjustified assumption was at the bottom of the misleading Scoping Report Transport chapter.

The 2025 Scoping Report is flawed, caused by the specific failure to specify aggregate types, namely hard stone for the tracks and limestone for the concrete. Had this statement been made, Colne might have been able to see that a great deal of stone was very likely to come through our town. As things

stood, all the Statutory Consultees were entitled to ignore the incompetent Access and Transport chapter of the Scoping Report.

Two years have passed since CWF Ltd were first informed by WTRG that they would have to import hundreds of thousands of tonnes of stone to build a wind farm on Walshaw Moor, but it is over four years since this elementary fact should have been obtained, when Mr Wilson and Dr Osman were considering alternative sites during due diligence in November 2021.

The evidence laid out here shows that because of the incompetence of CWF Ltd, the people of Colne and Laneshaw Bridge have not had any lawful opportunity to comment nor object, nor to shape the proposal while it was still flexible in its Rochdale envelope, so that the wind farm stone deliveries might have a less disproportionate effect on them. The site selection of CEP is poor for many reasons, and one of them, that should have been picked up in during due diligence as alternatives were considered, is that vast tonnages of stone must be imported by road.

If consultation on the Horton rail head confirms its unsuitability, further consultation must then be held with Pendle District Council, Colne Town Council and Laneshaw Bridge Parish Council and others, because our area would then have the whole track hard stone and concrete aggregate delivery on the route M65-Colne-Laneshaw Bridge.

Under the Rochdale envelope, these consultations should have happened while the proposal was still flexible so that the conclusions could have a material effect on the proposal before it entered "design chill". If the Non-statutory and Scoping consultations were indeed unlawful, then the DCO consultation pathway unravels to the launch of CEP on 29th April 2025.

2. The additional traffic and pollution will lead to adverse economic and health impacts.

CEP estimates that there will be an additional 16% of traffic added to the notorious North Valley during the peak construction phase, estimated at 16 months. Tellingly, they did not start the Highways assessment at their recent consultations until after Colne, beginning on Keighley Road.

The M65 funnels into Vivary Way, North Valley Rd and Windsor St, the street names of the A6068 between the M65 terminus roundabout and the A56 Skipton Rd roundabout. The maps below run from the M65 roundabout. They show the extensive retail frontages and density of right-angle junctions and pedestrian crossings controlled by lights, which make the traffic stop-start. Through traffic often follows a rat run through the middle of Colne to bypass the North Valley Rd congestion.

Council, would be taking place until after planning permission has been granted. When she questioned this, the response was: “Because that’s how it is done”.

Table 4 Baseline 2031 24-hour Average Daily Traffic Data

No	Survey Location	Cars & LGV	HGV	Total
1	A6068 Keighley Road, Cowling	8,985	886	9,870
2	A6068 Access Junction	7,456	1,138	8,594
3	A6068 Laneshawbridge	10,467	1,315	11,782
4	A6068 Colne	12,729	1,409	14,138

PEIR Table 4 gives the predicted average daily traffic in the study area in 2031. It predicts 1,409 HGVs at the A6068 at Colne and this would be increased by the 222 HGVs from Leyland, a 16% increase along an already congested road. We have to use the 1,409 figure from Table 4 because significantly, the PEIR does not supply a baseline for the key section of the A6068 through Colne.

Adding a 16% traffic increase to an already saturated road is a recipe for **hyper-congestion**. Because road networks operate near maximum capacity, even small volume spikes trigger exponential delays, increased emissions, and a cascade of diverted vehicles onto smaller, local roads. The immediate and long-term effects of this surge unfold through several physical and behavioural changes:

1. The Exponential Delay Curve

Traffic flow is non-linear. When a road is at capacity, a 16% volume increase doesn't just add 16% to your commute—it can double or triple travel times.

- The tipping point: Once traffic density passes optimal flow, even a minor slowdown (a lane merge, which happens frequently on the North Valley, as lanes are devoted to turns off the main route) triggers a shockwave, turning a slow crawl into a complete standstill.
- Bottlenecks: Intersections and merges become the primary choke points, locking up the network.

2. The "Spillover" Effect

When the main route clogs completely, impatient drivers divert to adjacent residential streets, rat-runs, and rural roads.

- The Capacity Drop Paradox: When a road network becomes oversaturated with cars, intersections and junctions lock up, meaning the actual volume of vehicles (throughput) that can pass through the town daily actively *falls*.
- Local impact: This shifts the congestion into neighbourhoods, degrading local air quality and increasing safety hazards near schools.

3. Induced Demand and Evaporating Traffic

Understanding how people react to a newly clogged road helps explain long-term trends:

- Traffic Evaporation: As congestion worsens, some drivers will eventually give up and cancel discretionary trips altogether, which would spell economic disaster for Colne, a deprived small, former cotton town.

Hyper-congestion (standstill traffic) severely degrades air quality within an Air Quality Management Area (AQMA) by triggering a combination of chemical, physical, and systemic failures. It prevents the area from meeting national air quality objectives (like annual NO₂ limits).

Colne's Windsor Street AQMA is known to be one of the worst in the county since declaration. Pre Covid, winter readings occasionally reached double, or even triple, the target pollution limit set nationally. Over the last few years, the 24 hour automatic readings ceased, as the equipment failed. The manual readings, undertaken at quiet times by Pendle Council recorded pollution within safe levels. Now new 24 hour, automatic equipment has just been installed after lobbying by local councillors. There are no long term data available as yet and staff are being currently trained on the new system.

How hyper-congestion affects an AQMA:

1. Spikes in Toxic Emissions

- **Engine Inefficiency:** Vehicles operating in stop-and-go traffic spend excessive time in low-gear, low-RPM states. This disrupts normal fuel atomisation and causes incomplete combustion. Congested vehicles can emit nearly **five times more** pollutants than vehicles moving at a steady, free-flowing speed.

2. The "Street Canyon" Effect

- Hyper-congestion halts traffic and traps dense clouds of exhaust (primarily NO₂ and PM10) between buildings. The lack of wind dispersion keeps ground-level pollution stagnant.

Prolonged exposure to trapped, hyper-concentrated emissions in these areas directly correlates with increased emergency hospitalisations for respiratory and cardiovascular illnesses, heavily impacting vulnerable populations like children and the elderly. It is worth noting that Colne's Windsor Street AQMA is very close to Park High secondary school and Favordale and The Grange residential nursing homes.

Hyper-congestion severely stunts a town's economy through lost productivity, degraded business efficiency, higher consumer costs, and suppressed local commerce.

- **Lost Productivity & Time Waste:** Employees experience delayed commutes, resulting in lost work hours. Economists often value this lost time against average earnings, reducing overall labour market efficiency and worker well-being.
- **Higher Logistical Costs:** Freight and supply chain delays mean businesses pay more for fuel, vehicle wear, and driver wages. These elevated operational costs are typically passed on to consumers. This means that surrounding areas will suffer too from Colne's predicted gridlock.
- **Decreased Local Spending:** Shoppers and diners actively and understandably avoid hyper-congested towns and town centres. This drop in traffic directly impacts small retailers, hospitality venues, and local services in favour of e-commerce, out-of-town retail parks or other locations. Colne has been working hard to maintain the health of its high street and its refurbished market has recently reopened – they could not tolerate significant and extended traffic issues.
- **Suppressed Investment:** Towns suffering from severe gridlock become less attractive for corporate relocations and new businesses. Companies require reliable connectivity for employees and clients, and chronic delays hinder business growth.

3. The adverse impact on our mainly Victorian solid stone constructed buildings, many of which are built close to, or directly adjacent to, the chosen route.

Heavy HGVs shake stone Victorian buildings by transferring low-frequency vibrations from the road, through the ground, and into the building's shallow foundations. This resonance excites the heavy, rigid, but brittle masonry, progressively breaking down the mortar, weakening wall ties, and causing micro-fractures in the stone or brickwork.

Cllr Sarah Cockburn-Price questioned CEP consultant, Ash, at the recent consultation event at Primet Community Centre about the numerous Victorian, solid stone houses that line the route. He smoothly assured her that all Grade 1 and Grade 2 buildings will be fully protected. She explained that these Victorian buildings aren't listed or protected. He looked surprised, but then added: "*I wouldn't know about that, as I am Australian*". This did not inspire confidence.

Ground Transmission and Resonance

When a 20-tonne HGV strikes road irregularities (like potholes or uneven paving), it generates kinetic energy that forces shockwaves through the soil.

- Because stone Victorian buildings are heavy and stiff, they have a natural frequency. If the vibrations from the lorries match this frequency, the building experiences resonance, amplifying the shaking effect significantly.
- The depth of the building's original shallow foundations often fails to isolate the structure from these low-frequency ground vibrations.

Breakdown of Lime Mortar

Victorian stonework relies heavily on lime mortar to bond the stones and allow the walls to "breathe."

- This mortar is intentionally softer than the stone itself to accommodate natural thermal expansion and moisture movement.
- Constant micro-vibrations from passing HGVs act like a continuous jackhammer, physically pulverising the brittle mortar over time, turning it to dust, and degrading the structural integrity of the walls.

Delamination and Disruption

Many Victorian stone walls are not solid single blocks; they are built as multi-leaf walls, consisting of an outer and inner face of dressed stone with a core loosely filled with rubble and mortar.

- The relentless shaking caused by heavy traffic causes these different wall layers to vibrate at slightly different rates.
- This differential movement eventually causes the layers to separate (delamination), leading to bulging walls, dropping lintels, and the collapse of chimneys.

Cumulative Fatigue

Unlike an earthquake that occurs once, HGV traffic pounds historical structures daily. This causes cumulative structural fatigue. Even if a single lorry doesn't cause visible damage, the continuous cyclic loading permanently weakens joints, loosens roof timbers where they sit on the masonry, and causes cracks to spider outward from stress points such as windows and doors.

4. Sensitive Viewpoints from Colne

Colne is one of the country's few hill towns. Indeed, it is known locally as Bonnie Colne o' th'Hill. For this reason, the Colne Neighbourhood Plan (2023) commissioned a viewpoint analysis. There are 17 protected viewpoints. You can read more about them in this document, authored by an expert commissioned by the Town Council: <https://colnetowncouncil.org.uk/ctc/wp-content/uploads/2022/08/Colne-Significant-Viewpoint-Assessment.pdf>

At the recent consultation at the Primet Community Centre, Cllr Sarah Cockburn-Price spoke to CEP's viewpoint expert. Before she did that, she opined to Christian Egal about why the sole viewpoint from Colne is from Colne Cemetery. He quipped: "*We modelled it from there because then there would be no complaints!*". The rather more serious visualisation expert said that au contraire, he chose it because it afforded an open view. Cllr Cockburn-Price explained about the Town Council's viewpoint analysis and its protected views. She requested:

- Each of the 17 viewpoints to be modelled and assessed for change sensitivity
- That video modelling be provided, showing the turbines moving and with nighttime lighting

5. The lack of expertise of the developer and the chequered business past of Christopher Wilson Leads to a Lack of Due Diligence

We have been shocked to learn of the poor track record of the team behind this proposal and how it is unlikely that this inexperienced team would have been offered more favourable sites for a wind farm. This also explains how the PEIR is riddled with errors and cannot be relied upon, in consequence.

We summarise the findings of the Walshaw Moor Turbine Research Group:

In order to assess the due diligence with regard to alternative sites, we must consider evidence about the experience of the founder, and now Executive Chairman, of CWF Ltd, Christopher Wilson. His experience relative to other developers at the proposal's effective inception on 11th November 2021 determines the range of alternative sites to which he might have had access then or subsequently.

We shall show that CWF Ltd, and its founder Christopher Wilson, had no reputation as a developer of wind farms when the proposal on Walshaw Moor began, and the performance of CWF Ltd since inception has reduced their credibility at each of four stages since inception. We consider these circumstances to have so narrowed the alternatives available to CWF Ltd that they were left only with the highly unsuitable Walshaw Moor.

In this response to Ch 5 we refer to the classic paper 'The escalation of commitment to a course of action' by Barry M. Staw².

1. The following statements are taken from the PEIR for CEP.

5.1.1 In accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations') an important part of the EIA process is to describe the reasonable alternatives considered during the evolution of the Proposed Development, such as design, technology, location, size and scale, and to set out the main reasons for selecting the chosen option. As such, this Chapter describes the reasonable alternatives that **have been considered**, at this preliminary stage of the Proposed Development.

Comment: Chapter 5 does not describe any reasonable alternatives that have been considered.

5.2.6 The Planning Inspectorate's (PINS) Advice Note Seven reinforces this approach, confirming that a good ES should 'explain the reasonable alternatives considered and the reasons for the chosen option, taking into account the effects of the proposed development on the environment'.

5.5.1 A robust site selection process **is being carried out**, comprising a number of detailed appraisal stages, **to validate the chosen PEIR Boundary** for the Turbine Area. The selection and optioneering of the cable corridors and access routes is explained in Section 5.6: Alternative Designs.

Comment: Note the change of tense between 5.1.1 ('have been considered') and 5.5.1 ('is being carried out'). Note the retrospective validation of a course of action begun in 2021 that has undergone 'escalation of commitment'. The escalating proposal has now consumed £15 million of the investor's money³ and demanded the close attention of numerous consultees, agencies and the Planning Inspectorate.

5.5.5 Land Availability and Scale - identification of developable area that is available, of at least 2,000 ha*, this included the aggregation of two smaller adjacent parcels of 1,000ha within 1km of each other. This included ensuring 50% of the land parcel has a gradient of 20%, to accommodate the turbine layout and associated infrastructure efficiently and safely;

*A 2,000ha search area has been applied as this represents the maximum size of the Turbine Area.

Note the confirmation bias here, a symptom of the escalation of commitment. The search for alternatives is retrospectively filtered to match the area of Walshaw Moor, but as we shall show, Walshaw Moor was available to the inexperienced developer Christopher Wilson only because it was so unsuitable.

Also note the slapdash sentence, "*This included ensuring 50% of the land parcel has a gradient of 20%, to accommodate the turbine layout and associated infrastructure efficiently and safely.*" The meaning here is presumably that to be considered suitable, at least 50% of the land parcel had a gradient of **less than** 20%. The PEIR layout for CEP has several turbines located on ground where the gradient exceeds 20%. The maximum gradient of any existing Pennine single wind turbine site is 12% (one example in Coal Clough WF). Pennine wind turbines do not need to be built on sites exceeding 10% because the high ground forms plateaux. CEP has turbines on very steep ground (several > 20%)

² Staw, Barry M., The Escalation of Commitment to a Course of Action, *The Academy of Management Review*, Vol 6., No. 4 (Oct. 1981) pp 577-587

³ CWF accounts year ended 31 December 2025. The figure is £15,120,494

because it has become overcrowded as it has retreated from the deeper blanket bog. No operative wind farm in the UK is as congested as CEP.⁴

2. Date of inception

CWF Ltd was incorporated on 15th February 2021 with Christopher David Griffin Wilson as sole Director. Mr Wilson resigned as Director on 21 March 2022, since when he has been Executive Chairman; on 21 March 2022 Dr Ghazi Mohammed Ahmed Osman became sole Director. Dr Osman's doctorate is in Civil Engineering.⁵

The first involvement of Al Gihaz Holding, a company registered in Saudi Arabia, was on or before 11th November 2021, since this is the date of their agreement with Walshaw Moor Estate. Clause 6.1.3 of this agreement is referenced in the Proprietorship Register of several parcels of land on Walshaw Moor, including The Waste WYK118799, owned by Richard Bannister. We can thus date the start of what Professor Staw calls "the escalation of commitment" to 11th November 2021.

3. The planning process is usually protected by due diligence at inception

Ordinarily, the planning process is not exposed to the escalation of weak and speculative proposals because the directors of reputable companies undertake low stakes due diligence before escalation.

4. No evidence of due diligence has been provided

No indications of alternative wind farm sites considered during due diligence by CWF Ltd. have been exhibited.

Due diligence in considering Walshaw Moor and the alternative sites should have included:

- The international designations (the turbine area Walshaw Moor is inside the South Pennine Special Area of Conservation (SAC: peatland and acid grassland habitats) and Special Protection Area (SPA: red-listed birds)
- The world significance of the Brontë Moors heritage which would be absent on alternative sites
- The on-site rock from which the tracks and concrete might be made
- The final miles of site access for the turbine components from the motorways
- Approximate mean wind speed and approximate installed MW distance to DNO or NG grid

5. Due diligence on these fundamental points is not difficult

All the data required for appropriate due diligence is freely available in the public domain. We shall show that no due diligence even of this limited scope was undertaken.

6. International designations and Brontë heritage were very unusual complications

The international designations and Brontë heritage were very unusual complications on Walshaw Moor, because the turbine area is inside the SAC and SPA, and coincides with the Brontë moor, *prima facie* the statutory setting of the Grade I listed Haworth Parsonage. Only one onshore wind farm in the UK that is wholly inside either an SPA or SAC has ever been consented: Strathy South WF⁶ is on former commercial forestry within the Caithness & Sutherland SPA/SAC and was subject to a Public Inquiry and a consent pathway of more than a decade. The peat under the conifer forest was already

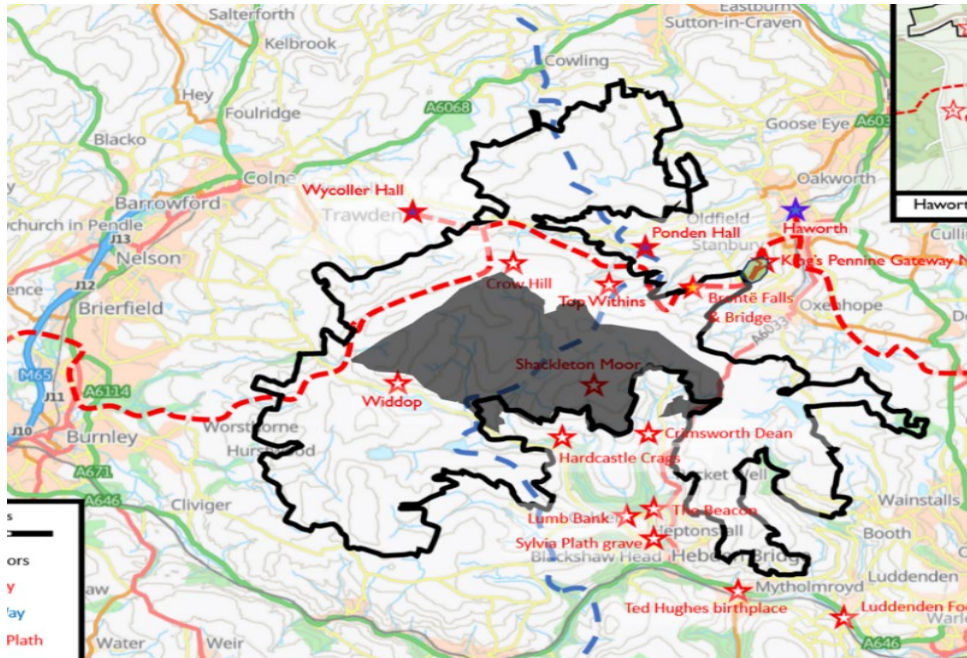
⁴ [Scoping Opinion appendices p 120 adopted by Secretary of State 10 October 2025](#)

⁵ [CALDERDALE WIND FARM LTD overview - Find and update company information - GOV.UK](#)

⁶ [Strathy South | SSE Renewables](#)

being destroyed by the forest drains and the trees themselves. Strathy South did not have the additional complication of being the inspiration to writers of world significance.

The relationship of the CEP turbine area, the South Pennines SPA and SAC boundary and the Brontë heritage is indicated in the map below. There is primary evidence⁷ that the Brontë Moor “between the ridges” is essentially the same as the turbine area.



7. Analysis of worst-case scenarios for site selection

Although CWF Ltd has not provided any indication of the alternatives considered at due diligence, we can construct a list of alternatives that might have been as complex as Walshaw Moor in November 2021. We examine sites that are inside both an SPA and an SAC and have some literary heritage. Note that Exmoor and Dartmoor are not SPA.

Exmoor: SAC not SPA; setting of *Lorna Doone* (R.D. Blackmore)

Dartmoor: SAC not SPA; setting of *The Hound of the Baskervilles* (Arthur Conan Doyle)

There are nineteen areas that contain an intersection of SPA and SAC. The list below gives an indication of their qualifications to be a literary landscape.

1. **South Pennine Moors** *Wuthering Heights* Emily Brontë, *Jane Eyre* Charlotte Brontë, *The Tenant of Wildfell Hall* Anne Brontë, *Remains of Elmet* Ted Hughes and Fay Godwin, *Ariel* and *Crossing the Water* Sylvia Plath
2. **Alde-Ore Estuary** *The Rings of Saturn* W.G. Sebald
3. **Arun Valley** possible connection with *The Wind in the Willows* Kenneth Grahame
4. **Ashdown Forest** *Winnie-the-Pooh* and *The House at Pooh Corner* A.A. Milne
5. **Breckland** some connection with *The Go-Between* L.P. Hartley

⁷ Preliminary Heritage Impact Assessment of CEP and Brontë Moors version 05. Friends of Brontë Country

6. **Benacre to Easton Bavents** *The Rings of Saturn* W.G. Sebald
7. **Chesil Beach & The Fleet** *On Chesil Beach* Ian McEwan
8. **Dungeness, Romney Marsh & Rye Bay** *Moonraker* Ian Fleming
9. **Dorset Heathlands** *The Return of the Native* Thomas Hardy
10. **East Devon Heaths** some association with *The French Lieutenant's Woman* John Fowles
11. **Exe Estuary** weakly associated with *The Secret of Moonacre* Elizabeth Goudge
12. **Flamborough & Filey Coast** *Dracula* Bram Stoker
13. **Minsmere-Walberswick** *The Rings of Saturn* W.G. Sebald
14. **North Norfolk Coast** *The Woman in Black* Susan Hill
15. **North Pennine Moors** *All Creatures Great and Small* James Herriot
16. **North York Moors** *Dracula* Bram Stoker
17. **The Broads / Broadland** *Coot Club* Arthur Ransome
18. **Thames Estuary & Marshes** *Great Expectations* Charles Dickens
19. **Deben Estuary** *We Didn't Mean to Go to Sea* Arthur Ransome

Of these candidate alternatives only two are both SPA and SAC and would be widely regarded as of world significance as literary landscapes, rather than the setting of single works: Walshaw Moor and Ashdown Forest.

8. Walshaw Moor is a super-outlier

Most of the areas described do not remotely attain the complete identification of literary landscape combined with compactness that Walshaw Moor (2,200 ha) and Ashdown Forest (2,630 ha) exemplify.⁸

We can conclude, given the control set constructed above, that Walshaw Moor and Ashdown Forest are super-outliers in planning complexity, and this has been observed by many consultees. "If you can build a wind farm on Walshaw Moor, you can build a wind farm anywhere."

We have given evidence that the planning complexities of Walshaw Moor were extreme in 2021, and that any expert could have done the modelling above on the three dimensions of SPA, SAC, and world heritage significance during a short period of due diligence. Since the chosen site was a super-outlier, we conclude that no adequate modelling of relative planning complexity between alternatives was undertaken; had it been, a simpler site would have been chosen; we conclude that some understanding of complexity was attained only when Staw's 'escalation of commitment' was

⁸ A canon of "Literary Landscapes" is provided by the sites photographed by Bill Brandt in his *Literary Britain* Cassell (1951). Brandt's list predates the achievement of *The Rings of Saturn* by W.G. Sebald whose significance can be assessed by its position at 61 in the Guardian's list of 100 greatest novels of all time. *Wuthering Heights* is at 20 and *Jane Eyre* at 8. The prequel to *Jane Eyre*, *Wide Sargasso Sea* by Jean Rhys is at 50. *The Go-Between* 99, *The Return of the Native* 95, *Dracula* 76 and *Great Expectations* 35 completes the list of novels noted in the SPA/SAC list and shows the potency of the Brontës. *Jane Eyre* 8 is between *Madame Bovary* 10 and *War and Peace* 7.

well underway. In fact, we shall show that as late as 17th May 2025, CWF Ltd. had no full understanding of what should have been understood at due diligence by November 2021.

9. The evidence of Donald Mackay

This analysis confirms the admissions made by several CWF Ltd consultants that the proposal is unusually difficult, and that they could not name any sites they had worked on that were as complex as Walshaw Moor. The most convincing witness to the non-existence of alternatives is CWF Ltd consultant Donald Mackay who is held in the highest regard by many who have dealt with him at the public consultations. The following exchange is in the public domain.⁹

NM: *“There’s an idea that the company must consider other sites before developing on peatland.”*

DM: *“That just isn’t ever how these stories go. Christopher Wilson finds this site and gets some investors interested enough to make a start. Every wind farm is the same.”*

The vital difference is that most consented wind farms are developed to consent by established companies (SSE, Vattenfall, EDF, for example) with reputations to lose; they have long experience, access to alternatives and always do due diligence. Because they are large companies, they attract the best consultants who have a strong incentive to submit accurate work.

10. Attempts to make Walshaw Moor seem suitable

What we see throughout the consenting process (CWF Scoping Report September 2023; CEP Non-statutory Consultation Brochure (29th April -10th June 2026); CEP Scoping Report September 2025; CEP PEIR 8th April 2026) is the attempt to make Walshaw Moor seem **retrospectively** like a suitable site. **There has been a failure to show suitability in the PEIR on all three dimensions: SAC, SPA, heritage of world significance.**

11. The least experienced developer is offered the most complex site

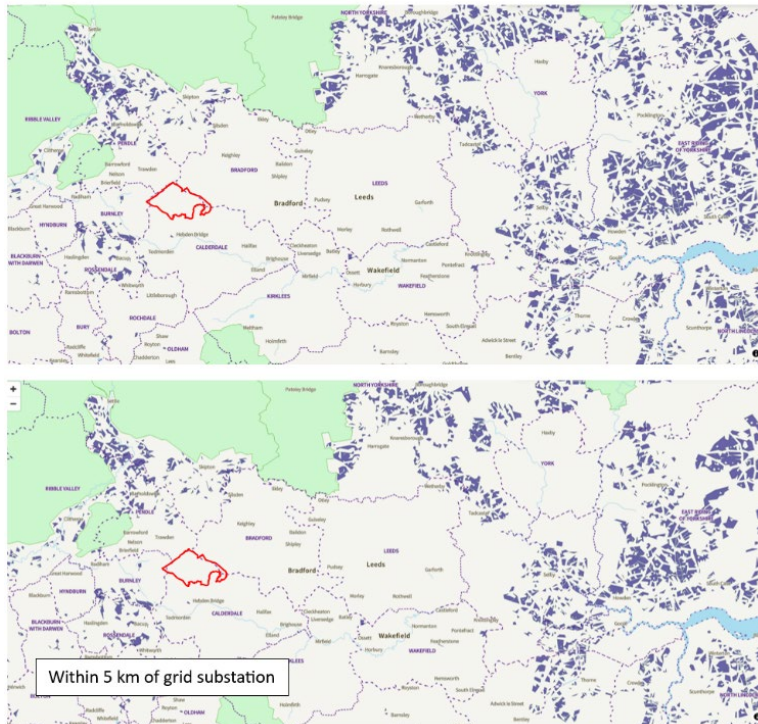
We now come to the key point on alternatives that relates to the particular case of Christopher Wilson and Walshaw Moor. There are hundreds of sites for wind farms that are much less complex than Walshaw Moor, but none of these was likely to be offered to Christopher Wilson in 2021 because he had no background or expertise in electricity generation. Since nobody would trust a first timer to develop a suitable site, he attempted an unsuitable site. **On the SPA/SAC/heritage axes, there was no site in England less suitable than Walshaw Moor.**

12. Alternatives mapped by Friends of the Earth and Exeter University

Friends of the Earth and Exeter University have done a study of suitable wind farm sites in England¹⁰. Their model starts with average wind speeds and screens out the extreme complexities of sites in National Parks, SPAs and SACs and puts a 2 km buffer round the latter two. The model has the option to filter sites further than 5 km from the grid, so that connection costs are reasonable. The maps below show the sites around Walshaw Moor that Friends of the Earth calculate are suitable for wind farms; the second map applies the 5 km grid filter. Note that Walshaw Moor is blank, and that the connection to the grid at Bradford East is over 18 km long, and a buried cable is specified. **Friends of the Earth and Exeter University, in a study whose purpose was to show the huge range of suitable sites for onshore wind in England, did not consider Walshaw Moor to be a suitable site.**

⁹ This exchange [in public domain](#) since 4 June 2025

¹⁰ [Release our wind | Friends of the Earth](#)



13. Landowners with good sites trust experienced developers

Because Christopher Wilson had no reputation as a developer of wind farms, the alternative sites that were offered to him, if there were any, were likely to be unsuitable, and all of them must have been at least as unsuitable as Walshaw Moor. The suitable sites are found and developed by the companies with a reputation. Landowners can trust them; they know how the planning process works and they have already filtered out the unsuitable sites that might cost them time, money and reputation, or which require disproportionate connection costs: the buried cable route from CEP to Bradford West is over 18 km long.

14. The inexperience of Christopher Wilson is a matter of record

Investigation of Christopher Wilson’s business activities has not found any wind farms that he or his companies have developed. Mr Wilson’s companies are initially agricultural. Following the insolvency to cover debts to Mutchmeats, there seems to be a phase of small-scale residential property development. Since 2022 there has been a phase of shell companies ostensibly concerned with renewable energy, one of which states its actual purpose as “Residents property management.”

LOWER HOLLOWFIELDS FARM Co. no. 3230742 Secretary 6 August 1996-5 August 2002. *Agriculture*

TWG PIG CO LIMITED Co. No. 04027907 Director 27 July 2000 *Swine farming*; wound up in High Court of Justice and liquidated to pay a debt to Mutchmeats Ltd 17 September 2003.

WILSON AGRICULTURE LTD Co. no. 3099327 Director

This company, given by Christopher Wilson in his application to become a director of TWG PIG CO LTD has no record under the company number at Companies House.

INTERGRO LTD Co. no. 05538534 Director 20 September 2007 Compulsory strike off 5 June 2012

Shell company

TALBOT HOUSE INVESTMENTS LTD Co. no. 07169348 Director 25 February 2010- 13 March 2011

Residential property development

13 MANDELA LTD Co. No. 12009861 Director 21 May 2019 -4 Feb 2020

Residents property management. Dissolved

THE WILSON GROUP & ASSOCIATES LTD Co. no. 07662848 Director 8 June 2011 Compulsory strike off 20 June 2015. *Other business support services*

THE WILSON GROUP AND ASSOCIATES LIMITED Co. no. 1091296414 Director August 2017-November 2019 *Other business support services. Voluntary strike off*

ZENITH HOUSING SOLUTIONS LTD Co. no. 12879398 Director 14 September 2020

Shell company whose stated purpose was renting and operating of Housing Association real estate

TALBOT DEVELOPMENTS LTD Co. no. 09853577 Director 3 November 2015-24 November 2020

Residential property development. Voluntary strike off

GRIFFIN UK HOLDINGS LIMITED Co. no. 11693641 Director 23 November 2018

Development of building projects. Voluntarily dissolved 4 February 2020

SEVERN ESTUARY WIND FARM LIMITED Co. no. 14131859 Director 25 May 2022

Shell company. Voluntary strike off 5 September 2023

COLNE RENEWABLES LIMITED Co. no. 14939211 Director 15 June 2023 *Shell company*

BIRR RENEWABLE LTD Co. no. 14871615 Director 16 May 2023. *Shell company*

WORLDWIDE RENEWABLE ENERGY GLOBAL LTD Co. no. 12259926 Director 14 October 2019

Stated purpose "*Residents property management*". Under first notice for involuntary strike off.

We shall examine WWRE Global Ltd below because it was the vehicle most directly involved with CWF Ltd; a company with a similar name appeared on the first CWF website.

15. Management failure at CWF Ltd was immediate

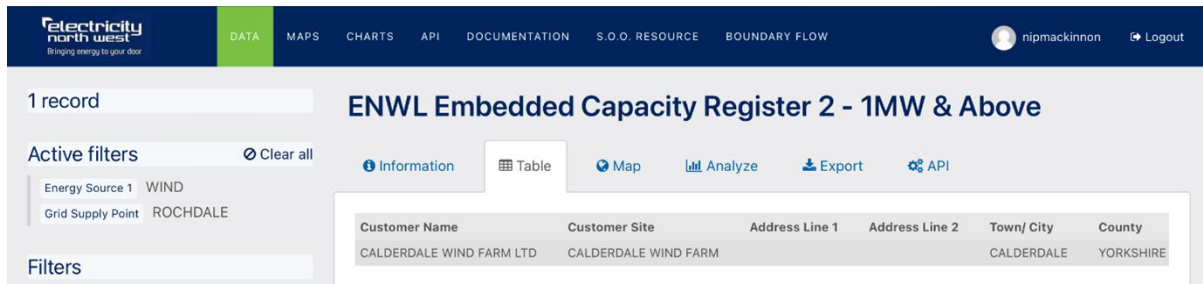
Christopher Wilson's lack of experience in the field was soon exposed in his management (as Executive Chairman) of CWF Ltd. The 65-turbine proposal "Calderdale Wind Farm" was launched in September 2023 with a Scoping Report by the reputable consultancy Natural Power, and a website whose authorship is unknown. There were contradictions between the proposals described on the website and in the Scoping Report. The website's FAQ 17 claimed that the proposal was "accepted to connect" at Padiham.

17. How will Calderdale Wind Farm be connected to the Grid?

We already have an offer from the Distribution Network Operator Energy North West to connect into the local electricity network substation at Padiham. Negotiations are also ongoing about an alternative connection via a new substation and that would go into National Grid which would connect into existing 440 KV pylons.

The grid connection and associated infrastructure would be subject to a separate planning application to the wind farm.

In fact CWF was accepted to connect at Rochdale and this was confirmed by their entry in the embedded capacity register of Electricity North West.



1 record

ENWL Embedded Capacity Register 2 - 1MW & Above

Active filters: Clear all

Energy Source 1: WIND
Grid Supply Point: ROCHDALE

Filters

Customer Name	Customer Site	Address Line 1	Address Line 2	Town/ City	County
CALDERDALE WIND FARM LTD	CALDERDALE WIND FARM			CALDERDALE	YORKSHIRE

FAQ 17 is remarkably garbled and states the voltage of the National Grid as 440 Kelvin Volts when it is in fact 400 kV. Although the KV/kV unit error might be considered a typo, it is not an error that a reputable developer would ever make.¹¹ 440 kV is the voltage of the US transmission system.

WTRG informed Mr Wilson of the errors in FAQ 17 and on 18 September 2024 it carried this revised version of FAQ 17.



17. How will Calderdale Wind Farm be connected to the Grid?

There are currently two options available for Calderdale Wind Farm to connect to the Grid. One is for the project to connect via Electricity North West at Rochdale sub-station (for up to 170MW) and the other is a direct connection by National Grid (for up to 312MW).

A grid connection at Padiham is no longer being considered. No decision has been taken about which connection option the Project will use. The grid connection and associated infrastructure would be subject to a separate planning application to the wind farm.

This version of FAQ 17 survived for three weeks, after which the entire website was wiped clean, except for a front page carrying a photograph of a wind farm that was certainly not built on protected peat.

16. CWF described as “worse than useless” by Donald Mackay

Donald Mackay described the original CWF as “worse than useless”¹² on 29th May 2025 at the Trawden public consultation. Although this senior consultant might want to thus dismiss it, CWF is considered a legitimate iteration of CEP, and appears in PEIR 5.7.1-5.7.3. We may use the information CWF Ltd published about CWF to assess the process of due diligence from inception to the collapse of CWF in October 2024. Assessing the due diligence for Walshaw Moor then allows us to assess the scope of due diligence about the hypothetical alternatives. In fact, of the four published iterations, the original CWF is the only one that is not grossly over-crowded by the standard 3 RD by 5 RD metric, and its 2023 Scoping Report has no simple location errors, unlike all the other CWF Ltd. publications. Yet it was described as “worse than useless”.

17. Christopher Wilson failed to assess the aggregate problem on Walshaw Moor

Importantly from a Colne perspective, during the perfunctory due diligence process, Christopher Wilson failed to assess the aggregates that would be used to build the wind farm. We have dealt with this extensively in our first point of objection.

19. Did Christopher Wilson mislead Richard Bannister about the extent of his experience?

¹¹ WTRG have a peer-group panel of five reputable wind farm proposals against which they compare Calderdale Energy Park’s performance. No wind farm proposal in the panel has ever made the KV, Kelvin Volts error.

¹² [Guest blog – Walshaw Turbine 21 by Nick MacKinnon – Mark Avery](#)



The CWF website was launched in September 2023. As well as its muddled FAQs, it displayed the logo of a company called WWRE, shown left.

A link on the CWF website¹³ led to the website of a company called WWRE based in Madrid. The logo of this Madrid-based company resembles that of the company called WWRE that was on the CWF website. The stated purpose of the different company with a similar name, WWRE Global, was “Residents property management” and its sole director was Christopher Wilson.

As we have seen, in 2019 Christopher Wilson became director of a UK company with a similar name to WWRE: WORLDWIDE RENEWABLE ENERGY GLOBAL LTD. This was not the company WWRE based in Madrid; the registered address of WWRE Global Ltd was in Malmesbury. No transactions appear in the accounts of WWRE Global from incorporation to its application to be struck off on 9th April 2026. This is despite the fact that the CWF accounts for the period ending 28th February 2022 state that WWRE Global has been paid £200,998 and still held £114,015.

20. Conclusion on due diligence and alternatives

Since the initial due diligence was inadequate to assess Walshaw Moor itself, it was certainly inadequate to allow comparison of alternatives. Either there were no alternatives, or the comparison of alternatives was inadequate. Since Walshaw Moor was a super-outlier with respect to SPA/SAC/heritage, it is most unlikely that any of the alternatives was more complex to develop than Walshaw Moor.

6. The numerous errors in the PEIR

Again, Colne Town Council was shocked to learn of the numerous errors in the PEIR. Without the sterling work of the Walshaw Moor Turbine Research Group, we should have trusted it completely.

Summary of location errors in published documents

Any PEIR has complex evidence and modelling which may be impossible for consultees to assess and is taken on trust. The presence, throughout the CEP pre-application process, of simple location errors, occurring in multiple documents, indicates that no statement in the PEIR concerning the reality of Walshaw Moor can now be taken on trust.

CEP PEIR

At launch, and persisting until Walshaw Turbines Research Group (WTRG), part of the coalition campaign group Stronger Together, notified CWF Ltd and PINS of the errors¹⁴, the master location Table 4-1 of millimetric turbine locations did not match the maps published of the proposal. The PEIR 4.3.3 states that “the indicative turbine locations identified at this stage and used for the preliminary

¹³ [WWRE - Global Renewable Energy Investments](#)

¹⁴ *ibid*

assessments presented in this PEIR, are provided in Table 4-1” but in fact the maps were right, and the location table was wrong. For five turbine locations in the table were wrong and the magnitude of the errors was: T22 (192 m), T27 (155 m), T28 (342 m), T30 (191 m) and T34 (39 m).

CEP Scoping Report

The list of location errors in the Scoping Report is very extensive. There are 13 separate errors on the hydrology map 8-1; three different maps of the layout are given in the noise chapter; the Scottish rivers Kelvin, Water of Feuch and Black Dean are said to flow through Walshaw Moor and to be infested with Himalayan balsam; there are 24 road numbering errors in the Transport and Access chapter with the M65 and M56 repeatedly confused; the A646 appears as the A644 and A464. The WTRG list of these road errors is published in Scoping Opinion adopted by the Secretary of State.¹⁵

CEP Consultation Brochure

At the launch on 29th April 2025 of CEP, a 41-turbine development, a suite of eight maps had a Turbine 42 and no Turbine 38. A further error in the peat depth map could only be corrected by the insertion of a sticker in all the Consultation Brochures.¹⁶

CWF website

From September 2023 until October 2024, CWF website stated from September 2023 to October 2024 that CWF was accepted to connect at Padiham, when the Embedded Capacity Register of Electricity North West showed no acceptance at Padiham, but 170 MW accepted at Rochdale. The website gave the transmission voltage of the National Grid as 440 Kelvin Volts. After these errors were pointed out by WTRG, the CWF website was deleted, except for its front page.¹⁷

Launch of CEP 29th April 2025

Christopher Wilson’s inability to manage the CWF Ltd central team was further evidenced at the chaotic launch of Calderdale Energy Park on 29th April 2025. On 1st May 2025 WTRG informed Christopher Wilson, and his new Project Director, Christian Egal, that the eight published maps of the new proposal were wrong: they had a T42 but no T38. A second error had been made in the key to the Peat Depth map. This suite of maps were withdrawn, and a correct set was published. It was too late to correct the Peat Depth map, so a sticker was added by hand to every Non-statutory Consultation Brochure.

Non-statutory Consultation Brochure did not indicate the “aggregate problem”

A vital deficiency of the Non-statutory Consultation Brochure was that no indication was made of the weakness of the on-site aggregates, which we have covered extensively above.

The failure to acknowledge the aggregate problem in the Non-statutory Consultation and the Scoping Report consultation was almost certainly incompetence rather than deception

Evidence has been provided below in the timeline that CWF Ltd still did not know about the weakness of the onsite aggregates on 17th May 2025.

CWF Ltd had been informed about the “aggregate problem”

¹⁵ [Scoping Opinion](#) adopted by Secretary of State 10 October 2024 p 112-114

¹⁶ [Guest blog – Walshaw Turbine 42 Calderdale Energy Park by Nick MacKinnon – Mark Avery](#)

¹⁷ This response, Ch 5 section 15 has the relevant screenshots

Well over three years, from 11th November 2021 to 17th May 2025, had passed since Christopher Wilson's failure to do due diligence on the aggregates. CWF Ltd had been given the information they needed directly both by WTRG and, when CWF Ltd found themselves unable to answer the questions and refused engagement, by a letter from Robbie Moore MP dated 12th October 2024, from the House of Commons. This second letter has never been acknowledged.

Failure to acknowledge the "aggregate problem" made the Non-statutory Consultation unlawful under Gunning Principle 2

Because this factor had either not been discovered or had been concealed, the Non-statutory Consultation was prima facie unlawful under the Gunning Principles. Given the facts about the need for imported hard stone, CWF Ltd should have consulted Colne about the implications while the proposal was still flexible.

Proposal errors spiral at Scoping

Because the Non-statutory Consultation had been so inadequate as to be potentially unlawful, it was inevitable that the errors in the Scoping Report of September 2025 would spiral. We know of no precedent for the gross-error-rate in this document in any wind farm Scoping Report, and a panel of five peer group Scoping Reports shows that the industry standard is to have zero location errors in an NSIP Scoping Report.

CWF Ltd now at the mercy of the consultants

The problem of having an Executive Chairman with no experience in the field, CWF Ltd was at the mercy of its consultants as the commitment escalated. The report only has 577 pages and many errors.

The document control panel has no named authors, checkers or approvers, and the Scoping Report was submitted as Revision 00 to the Secretary of State. The reason it took WTRG as long as a day to compile a list of the road errors is that there were so many of them. The list now appears in the Planning Inspectorate's Scoping Opinion, adopted by the Secretary of State on 10th October 2025. The Planning Inspectorate's own Scoping Opinion drew CWF Ltd's attention to this list.

WTRG list of road labelling errors in CEP Scoping Report

12.4.2

a) Bullet point 2. "A6068 between the M56 and Colne". The A6068 does not join the M56. For "M56" read M65.

b) Bullet point 6. "A6063 between Hebden Bridge and Cross Roads." For "A6063" read A6033.

c) Bullet point 7. "A464 between Todmorden and Mytholmroyd."

For "A464" read A646.

12.4.5

d) Bullet point 2. "A6068 between the M56 and Cowling; Count sites 28783 (Colne)"

For "M56" read Colne. Here "M56" cannot be read as "M65" because the M65 count is in the previous bullet point.

12.4.8

e] "Onsite PRoW present on the A6063". For "A6063" read A6033 or A6068 or both.

12.4.11

f] "The A6068 is operated by Lancashire County Council and is mainly a two-lane distributor road. It connects the M56 to West Yorkshire and passes through the town of Colne."

For "M56" read M65. For "West Yorkshire" read North Yorkshire.

12.4.16

g] "The A464 provides an east-west connection between Lancashire and West Yorkshire, connecting Burnley to Halifax."

For "A464" read A646. For "east-west" read "west-east" because Lancashire is west of West Yorkshire and Halifax is east of Burnley. Note that the A646 is not shaded in the Map 4-2 access corridors.

12.6.6

h] Bullet point 6: "Users of the A6063 between Hebden Bridge and Cross Roads."

For "A6063" read A6033. [The A6063 is a link road passing the tram museum in Preston.]

i] Bullet point 9: "Residents living alongside the A6068 between the M56 and Cowling".

For "M56" read M65.

j] Bullet point 10: "Residents living alongside the A644 between Todmorden and Mytholmroyd."

For "A644" read A646.

12.7.1

k] Bullet point 6: For "A6063", read A6033.

l] Bullet point 7: For "A6063", read A6033.

m] Bullet point 8: For "A6063", read A6033.

n] Both 12.4.13 and 12.4.14 are incoherent. Other corrections are possible, but both items should probably read:

"It is unlikely that the peak of construction will have a significant impact on the A56, but an impact assessment will be undertaken, given that it may be used for the import of bulk materials to the site."

o] 12.4.17 states that the A629 may be used for bulk materials with significant impacts. The A629 does not connect with the site. The final distributor road after the A629 will be the A6033, but 12.3.3 states that "Currently, temporary access to the east will be taken for general construction traffic and construction staff from the A6033" with no mention of the significant impacts of bulk materials. The bulk materials on the A629 in 12.4.17 evaporate before they move onto the A6033 in 12.3.3.

The Shortness of the Consultation

WTRG's objection to the shortness of the consultation period concerned the impossibility analysing the PEIR because of the nesting birds.

The matter was set out to Christian Egal (Project Director) and Ashley Robinson (DCO delivery) by Nick MacKinnon at the Denholme consultation on 17th April 2026. MacKinnon asked Egal and Robinson to extend the Statutory Consultation to 1st September 2026 to allow WTRG to check the peat depths on the north slope of Crow Hill, a major locus of peat slides.

NM: *"Given the pattern of errors in your publications, I have to survey Crow Hill, but it is the nesting season until July 31. I have to check every word you say."*

AR: *"It's not your job to check the PEIR."*

NM: *"I have to do it, because you obviously don't."*

PEIR mapping was inconsistent with the canonical table of turbine locations

Post Natural Power, the cartography provided by CWF Ltd has always been very poor. In particular, the PEIR has no plain map on an OS 25000 base of the proposed infrastructure, so WTRG have had to make their own maps. MacKinnon therefore began transferring the turbine positions from the clearest map provided, the "Source zones and Indicative flow routes" map in Appendix 10-4 (since corrected). This map had T22 positioned only 80 m from the Pennine Way. MacKinnon now noticed also that T28 was not on its familiar position on the immaculate peat of the Wadsworth Moor watershed.

In order to check his own map, MacKinnon thus turned to the canonical list of turbine locations, Table 4-1, which gave the grid references to 9 places, literally millimetric precision. For legal purposes, Table 4-1 defines the turbine locations. The PEIR itself states this:

4.3.3 The indicative turbine locations identified at this stage, and used for the preliminary assessments presented in this PEIR, are provided in Table 4-1.

When MacKinnon plotted the stated millimetric positions on the OS 25000 base map, he found that they gave the mysterious positions of T22 and T28 in the Source zones map. MacKinnon now checked the only other fairly clear map, also in Appendix 10-4, showing Elevation. This showed T22 and T28 in positions that corresponded with MacKinnon's previous computation of the turbine positions, acquired by ripping grid references from a hazy photograph of a CWF Ltd PowerPoint slide of a Google map, because "positive engagement" did not include publishing interim turbine locations or proper maps. Now MacKinnon checked the other maps in the PEIR and found that they were all consistent with each other, but none were consistent with Table 4-1.

Christian Egal's letter misses the fifth erroneous turbine location of T22

info@calderdaleenergypark.co.uk

21 Apr 2026, 12:35

Dear Mr MacKinnon,

Thank you for your phone call and email of 20 April regarding errors in the PEIR Chapter 4.

On receipt of your email I have immediately instructed our technical team to review the PEIR documentation to understand the nature of the errors, how these were made and what the implications are.

I can confirm the following:

- PEIR Chapter 4, Table 4.3.3 includes turbine coordinates which appear to have been based on a previous iteration of a potential design for the project, prior to Design Chill and adoption of the 34-turbine layout used for PEIR and statutory consultation.
- The turbine coordinates were updated in December 2025 following changes made to address the results of Phase 2 peat probing. These changes affected a small number of turbines where the turbines were micro-sited away from areas of deeper peat (particularly T28, but also T27, T30, T34).
- The PEIR assessment is based on updated coordinates and shapefiles following the Phase 2 peat probing and the 34-turbine layout as presented at statutory consultation.
- As such, the errors do not affect the modelling undertaken for PEIR or the analysis/conclusions that it reaches.
- Following your email I have asked my team to review all figures associated with Chapter 4. All figures, with the exception of Appendix 10.4, Figure 10.4.14 have the updated layouts from December 2025, which include the correct shapefiles and the correct coordinates for proposed turbine locations.
- A single figure (10.4.14) shows an old layout that included the removed T24 and didn't have the changes to turbine locations described above following Phase 2 peat probing. All other figures in Appendix 10.4 have the correct layout.

I would like to thank you for bringing this error to my attention. I have asked for Chapter 4 and Appendix 10.4, Figure 10.4.14 to be updated as soon as possible. We will upload both documents to the project library alongside an ERATA [sic] document and take the following steps to ensure that stakeholders are aware of the updated documentation:

1. We will notify all Prescribed consultees (S42 a-c)
2. We will notify local MPs
3. We will notify everyone who has already submitted feedback to the statutory consultation and draw their attention to the change, inviting them to submit further representations should they do so.

The corrections you have identified are drafting errors which do not constitute a material change to the conclusions presented within the PEIR and wider statutory consultation materials. As a result, we will not be amending the statutory consultation process.

The steps that I have outlined above are a reasonable and proportionate response to ensuring that stakeholders are able to meaningfully respond to the consultation, with more than the statutory minimum 28-day period still available.

Should any individual prescribed consultee request an extension to the consultation period in response to the above notification, this will be considered on a case-by-case basis.

Yours

Christian Egal

The simplest explanation for the repeated systemic location errors is the inexperience of Executive Chairman Christopher Wilson and the unsuitability of the site, pressurising the consultants

The triple failure to provide accurate locations in all three phases is unprecedented. WTRG has checked the corresponding publications of five NSIP-sized onshore wind farms sponsored by reputable developers and have found zero locational errors at either Scoping or PEIR in any of them.

WTRG have also made a study of the work of Logika, the consultancy that wrote the incompetent CEP Scoping Report. A direct comparison is available with Logika's Scoping Report for Dengie Marshes WF (30th May 2025).¹⁸ WTRG began this comparison expecting to prove that Logika were incompetent to assess any onshore wind farm, so they made an exacting examination of the Dengie Marshes scoping report. They found it entirely error-free, with excellent mapping. It was when Logika were working for Christopher Wilson on Walshaw Moor that they supplied incompetent, anonymous work. As Jon Kimber, Chair of Wadsworth Parish Council said to Christopher Wilson at the first CWF Ltd-Hilltop Parishes meeting (3rd February 2026, Hebden Bridge) *"Logika should have given you the money back for the Scoping Report, Christopher!"* Just as landowners would not entrust their good sites to an inexperienced developer like Christopher Wilson, so a normally reputable firm like Logika might not give of their best to CWF Ltd.

CWF Ltd has not supplied an explanation for these systemic errors, illustrated by the triple failure to supply correct locational information, surely the most basic requirement for any consultation. Until they do so, the explanatory factor is assumed to be inexperience of Christopher Wilson interacting with the super-outlier nature of Walshaw Moor, itself a consequence of his inexperience. An explanation of the repeated and escalating failures may be the inexperience of Executive Chairman Christopher Wilson in combination with the extreme unsuitability of Walshaw Moor.

7. The industrialisation of a wilderness on our doorstep

Walshaw Moor is ringed with large and small post industrial towns including Burnley, Bradford and, of course Colne, as well as numerous villages. It is, for us on the far side of Boulsworth, a vast and untamed wilderness. Colne is blessed with dark skies along this entire aspect. It is truly a magnificent thing to have such a vast, untouched wilderness right on our doorstep. Culturally, we will all be much poorer if it were to be expunged forever. Although we are repeatedly told that the operating lifespan of CEP is 35 years, we all know that it will be besmirched always, with, very likely, future phases coming forward.

We are well aware that early discussions were held to include not just a BESS (on a highly flammable, ecologically precious moor), but also solar panels arrays. Colne residents' escape from their dense, Victorian streets will necessarily become more limited once this magnificent landscape is industrialised. The proposed industrialisation of an area doubly protected by both an SPA and SPC is truly unforgivable. If such an area cannot be preserved for the nation for its incredible biodiversity, nowhere can. Is SSSI Boulsworth next? What do these "protections" mean if they fail to protect?

¹⁸ [Dengie-Marshes-Wind-Farm-EIA-Scoping-Report.pdf](#)

8. The negative impact on birds and ecology.

At COP 15, held in Kunming and Montreal, a global biodiversity framework was agreed by over 190 countries. It included as clause 3, the “30by30” target.

Ensure and enable that by 2030 at least 30 per cent of terrestrial and inland water areas, and of marine and coastal areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation measures, recognizing indigenous and traditional territories, where applicable, and integrated into wider landscapes, seascapes and the ocean, while ensuring that any sustainable use, where appropriate in such areas, is fully consistent with conservation outcomes, recognizing and respecting the rights of indigenous peoples and local communities, including over their traditional territories.

The PEIR makes no mention of the United Kingdom’s commitment to the 30by30 target set out in the Defra policy paper of 29th October 2024. The relationship of the proposal to the 30by30 target is highly significant and has the potential to cause highly adverse outcomes for the reputation of UK nature diplomacy and for the 30by30 target itself, worldwide.¹⁹

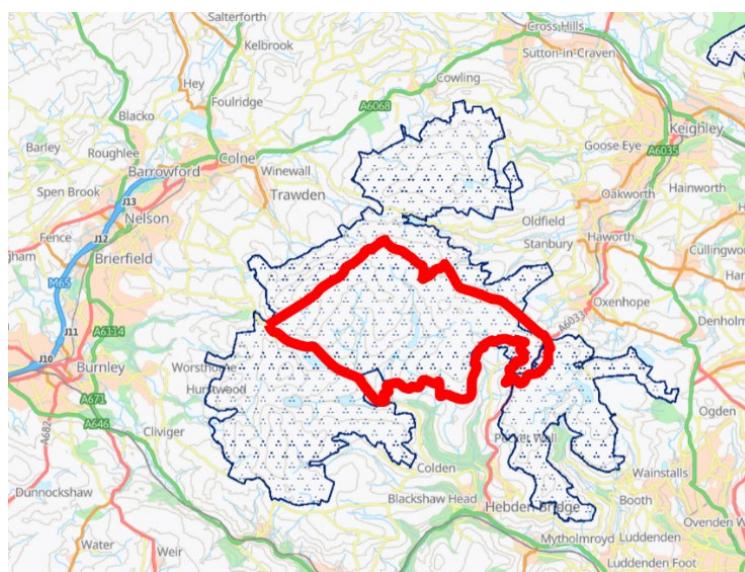
Defra statement that SPAs and SACs are the backbone of England’s 30by30 efforts

The UK has committed to protect 30% of land and sea for nature by 2030 (30by30), to support the global 30by30 target agreed at the UN Biodiversity Summit (COP15) in 2022.

As one of the most nature-depleted countries among the signatories at COP 15, England will struggle to achieve its 30by30 target. The backbone of the land that counts are the nationally designated Sites of Special Scientific Interest (SSSIs) and the internationally designated Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Since the current total in England is about 8%, other sites with lesser protections must now be found to meet a commitment shared with almost every country on Earth.

CEP is almost wholly inside the South Pennine SPA and SAC

The map indicates that the CEP turbine area is almost entirely on SSSI land and within the South Pennine Moors Special Protection Area and Special Area of Conservation and that it fragments the SPA and SAC by being at the centre.



¹⁹ [2030 Targets \(with Guidance Notes\)](#)

DEFRA give a criterion for the legal protection required of 30by30 areas:

“30by30 areas should be able to demonstrate that in-situ conservation will be sustained over the long term (at least 20 years), and that the area will be protected against loss or damage to important biodiversity values, through legal or other effective means. This includes protected area designations, conservation covenants, long-term ownership and relevant long-term management obligations.”

Because it is in the middle of an SPA and SAC, no 30by30 land in England has higher legal protection than the turbine area of CEP.

“Our 30by30 commitment presents an important opportunity to demonstrate the UK’s international leadership on nature conservation.”²⁰

“The UK will bring together foreign governments, philanthropy and business leaders to drive forward action to protect and restore nature at an event taking place today (17th February 2023) at Lancaster House, London. The event will help drive delivery of the deal agreed by almost 200 countries at the UN Nature summit in Montreal in December (COP15), which included a framework requiring countries to halt and reverse biodiversity loss by 2030 and to protect 30% of the world’s land and ocean by the same date. The framework requires a major push to increase the amount of money invested in tackling nature loss and restoring threatened habitats such as mangroves, rainforests and grasslands. The agreement set out a target to mobilise \$200 billion per year globally by 2030, including \$20 billion in flows to developing countries by 2025, rising to \$30 billion by 2030. The UK played a critical role in bringing countries together in Montreal and is continuing to lead the way by hosting the event, with the aim of driving forward global financing to support the implementation of the Global Biodiversity Framework.”²¹

This UK leadership means that every nation on earth except the USA has committed to the 30by30 target.²²

If consented, the CEP proposal will industrialise the SAC and SPA; this is likely to draw unfavourable international comment from the almost two hundred other countries who are working towards their own 30by30 commitments. Because of our strong claims to leadership in nature diplomacy we would be open to accusations of *“Do as I say, not as I do.”* An appearance of UK hypocrisy and back-sliding might begin to unravel the target worldwide.

The ornithology chapter of the PEIR and its appendices are a major contribution to our understanding of what *Conde Nast Magazine* have listed one of seven Wonders of the World for 2026.²³ The PEIR describes a place of high natural abundance of threatened, red-listed birds. In a country as nature-depleted as England, the CEP turbine area is proposed for the middle of one of the best places for birds in England.

What the PEIR calls the “broader ecological connectivity of the South Pennines SPA” is shattered by the turbine area. The potential destruction of this abundance of rare birds in complete upland assemblages on an SPA that is central to the UK 30by30 effort opens the government and people to imputations of hypocrisy.

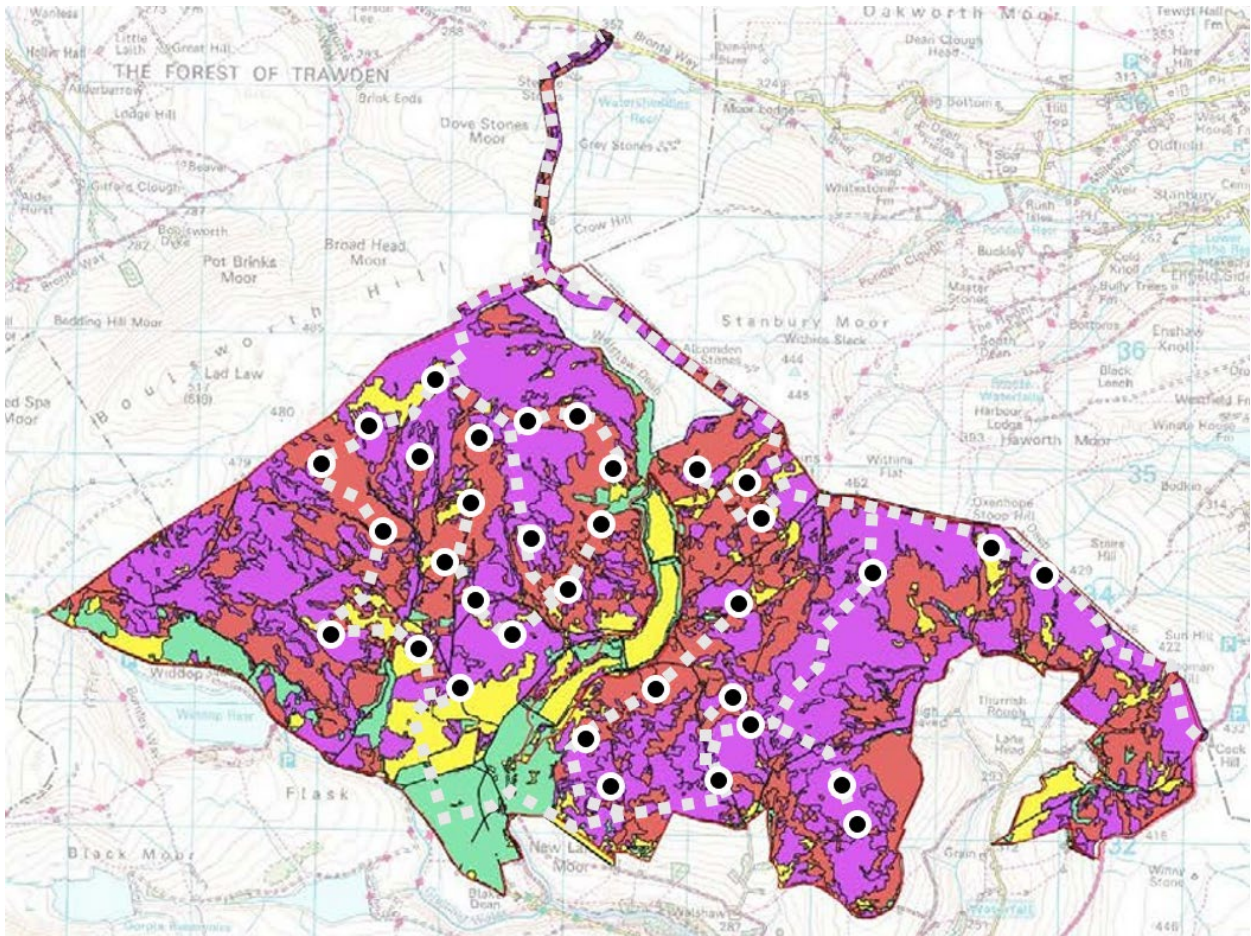
²⁰ [30by30 on land in England: confirmed criteria and next steps - GOV.UK](#)

²¹ [Leaders gather at London event in support of UN Nature COP15 agreement - GOV.UK](#)

²² [UK ready to support North Star for Nature – securing 30% of land and sea for nature by 2030 – Environment](#)

²³ [The Seven Wonders of the World for 2026 | Condé Nast Traveller](#)

5. The turbines and tracks wholly inside the SAC prefer “very high” and “high” sensitivity habitats



The map above (made by WTRG) superimposes the turbine locations and access tracks on the Habitat Sensitivity Map PEIR appendix 8-3 A1-11. The tracks are given standard 50m buffers. The CEP infrastructure is strongly attracted to the purple (very high sensitivity) and red (high sensitivity) areas that qualify the area as SAC while largely avoiding the yellow (medium) and green (low) sensitivity areas.

On-site quarries called borrow pits will be opened at six locations. These quarries can only supply bulk fill, available as a waste material at existing West Yorkshire and Lancashire building stone quarries. The primary purpose of the borrow pits is to create voids for the disposal of spoil and excavated peat from the turbine foundations, crane hard standings and very extensive cut-and-fill track system. The reason the cut-and-fill track system is so extensive is that the turbine locations are often on unusually steep locations because it is overcrowded compared with its Pennine peer group. This means both that floating tracks often cannot be used, while the steep ground also requires more excavation to achieve a level platform.

This destructive quarrying, excavation and track building occurs entirely within the Special Area of Conservation and on irreplaceable habitat of high and very high sensitivity.

The assumption of a constant delivery rate of hard stone for the 16 months of the proposal may contradict the statement of PEIR Table 9-2 concerning on-site working in the nesting season. It may be that CWF Ltd propose to stockpile hard stone somewhere within the Special Protection Area while work is necessarily suspended, and if so, this possibility should have been stated in the PEIR. The

nesting season runs from March 1st to July 31st and in these five months 192,500 tonnes of hard stone would have been delivered to the stockpile.

If there is no stockpile then the proposal will either take longer than 16 months or hard stone flows will exhibit much higher peak values than the 3,850 per month figure of Table 10. The PEIR should at least have a footnote indicating some cognisance of the relationship of the aggregate deliveries to the requirement to obey the Wildlife and Countryside Act (1981).

Public support for 30by30 is overwhelming

Research in countries spread over all five continents finds that 80% support the 30by30 target in their own countries²⁴. Defra report UK support for the policy as similarly strong:

“The British public has spoken with a clear, unified voice. New research conducted by independent insight agency Savanta shows the British public is strongly behind 30by30. Support for the goal cut across all 12 regions of the UK surveyed and was consistent across social grades and ethnicities. It’s a rare example of national consensus.”

The PEIR does not even mention the Kunming-Montreal Global Biodiversity Framework, and thus the effect of the CEP proposal on UK leadership in nature conservation. The PEIR does not offer baseline evidence for the relationship between the proposal and the 30by30 commitment.

The PEIR baseline ornithology evidence confirms that walkers on the Pennine Way will see short-eared owls, a dense assemblage of curlews, lapwings and golden plovers, and many different raptors. Such is the abundance, neither specialist knowledge nor binoculars are needed.

The remarkable ornithology of Walshaw Moor can be appreciated by visitors on the limited footpath system. That the curlew population is growing strongly on Walshaw Moor in CRoW Act (2000) open-access moorland shows that the compromise between a natural wonderland and people’s reasonable desire to experience it has found a successful equilibrium. Bikes are not permitted on the Pennine Way. Responsible dog owners, gamekeepers and farmers talk to irresponsible dog owners, so it is rare now to see a dog off the lead during the nesting season.

This success would be destroyed by the CEP track system, which would open areas that see a handful of people a year to a through traffic of electric bikes and irresponsible dog owners. The topologically unnecessary track across Stanbury Bog from Crow Hill to Top Withins and out on the A6033 is a particularly egregious example.

The PEIR’s omission of the King’s Bradford Pennine Gateway is perhaps a simple error, since it was described in the Scoping Report, but a striking one.

9. The negative impact on the peat, plus the danger of peat bursts and peat slides.

Calderdale Energy Park’s statutory consultation, and the Preliminary Environmental Information Report it is based on, cannot justify why the CEP should be constructed on peatland, or why they didn’t rule out other locations before choosing a peatland location. The government requires them

²⁴ [Mass support for conserving 30% of the Earth by 2030: Experimental evidence from five continents | PNAS](#)

to do both these things - they are requirements of the Dec 2025 National Policy Statement for Renewable Energy - EN-3, paras 2.12.76-2.12.78.

The lack of site due diligence has been covered extensively above.

Biodiversity PEIR fails to justify the need for infrastructure to be sited on peatland, although this is a DESNZ requirement. The December 2025 National Policy Statement for Renewable Energy Infrastructure (EN-3), paras 2.12.76-2.12.78, is clear that NSIP onshore wind farm applicants must “justify the need for infrastructure to be sited on peatland,” and “should rule out other locations before siting developments on peatland”.

This is part of the government's effort to give English peatland some protection from NSIP onshore windfarms. It received overwhelming public support in the 2024 public consultation on how to balance ‘Supporting green energy and the environment.’

At the Primet Community Centre consultation, Cllr Cockburn-Price was told that the ecological harm caused by the CEP construction would be outweighed by the green energy generation benefits in under one year. She did not accept this blandishment. It is widely accepted peat science evidence that putting windfarms on peatland is likely to undermine the green transition, not help it.

The Statutory Consultation evaded the peatland issue by misrepresenting public feedback to the non-statutory consultation last year as "concerns about locating turbines in areas of deep peat." This was not the case. It is not about deep peat, it is about any and all peat.

Shallow peat may be more vulnerable to the hydrological impacts of infrastructure. Shallow peat is a significant carbon store - any given area of it holds as much carbon as the same area of tropical rainforest. And it can be a more probable location for peat slides (see below about Crow Hill) than deep peat.

The Statutory Consultation's restoration proposals seem limited to the highly questionable proposition that reusing excavated peat is an effective peatland restoration measure. There are good reasons to be sceptical of this claim in the Outline Peat Management Plan. The Outline Peat Management Plan admits CEP has not calculated “in detail” the split of the total volume of excavated peat into acrotelmic and catotelmic peat. But catotelmic peat is very watery and less fibrous so more likely to disintegrate on excavation.

Peat is about 95% water, they treat it as a solid but it's a body of liquid held on a hill. Treating it as a solid leads to incorrect solutions. What holds this body of liquid together is that peat is highly fibrous. It forms a tangled geomatrix that holds the whole thing together and stops the water going anywhere. If water is removed, eg by excavating the catotelm, it is likely to disintegrate. It collapses and oxidises. So you can't reuse it effectively because the geomatrix structure will have been broken and it will be far more prone to be washed away.

PEIR Outline Peat Management Plan, Section 5 Reuse - and in fact **the whole Outline Peat Management Plan - depends on the questionable assumption that excavated peat can be reused for restoration, rather than being consigned as waste.**

Any so-called peat restoration projects that involve moving peat with the intention of preserving it, are likely to have been carried out in the recent past. What evidence is available that has measured their success over a significant length of time, given the complexities involved?

The Biodiversity PEIR has omitted Natural England's Scoping Response regarding the SAC that:

- Calderdale Energy Park should assess most areas of semi-natural vegetation on upland peat >0.3m as active or degraded blanket bog.
- All blanket bog is considered to be restorable.
- Based on local experience, there are peat forming species across large areas of the site, in which case the habitats would be considered blanket bog.

The consequence of bypassing this Scoping Response advice is that Calderdale Energy Park's Preliminary Environmental Information Report has underestimated by about half the predicted loss and degradation of Walshaw Moor's blanket bog as a result of the hydrological and other impacts of the proposed development.

The Preliminary Environmental Information Report shows that many of the baseline habitat, peat and hydrology surveys and resulting data are flawed and inadequate. And the methodology for predicting the impact on existing habitats, peat and hydrology and hydrogeology is not impartial and evidence-based, as it is legally required to be.

The result is a self-serving under-counting of just about every factor that defines the impact of the proposed development on Walshaw Moor:

- The "zone of influence" of its hydrology impact, and hence the area of irreplaceable habitat loss and degradation.
- The volume of peat excavated for infrastructure construction.
- The carbon emissions from the disturbance and degradation of the peat habitats.

Proposed mitigations to all the predicted impacts are scattershot and presented without evidence that they would really take care of all but "residual impacts" on the existing environmental features or "receptors". Particularly since their current extent and condition are likely to be misrepresented as a result of flawed baseline studies.

Walshaw Moor's internationally significant peatland habitats - the most highly protected in the country – are given three misleading sentences in the PEIR:

"Our initial assessments show that some habitats within the South Pennine Moors may be affected during construction..."

"As we complete final surveys, we are refining our understanding of how dust, hydrology, nitrogen and other factors may influence habitats, which will be confirmed in the Environmental Statement."

"A long term land management and monitoring strategy is being developed to help species adapt and to ensure habitats improve over time."

Walshaw Moor's blanket bog, wet and dry heath are protected as priority habitats by the South Pennine Moor's Special Area of Conservation. It is illegal to damage their ecological integrity. CWF Ltd has admitted since 2023 that the development would not be able to avoid damaging the integrity of these interconnected peatland habitats. As a result, CEP is applying to the Secretary of State to derogate the legislation that forbids damage to their ecological integrity.

There is a considerable and growing body of peat science knowledge about how dust, disruption of peatland hydrology and other consequences of building infrastructure on peatland habitats cause damage over such a long duration that it outlasts not only the life of a wind farm, but human lifespans. This knowledge is a work in progress and so in many cases is not definitively quantifiable. Therefore, the precautionary principle should apply.

On the basis of current research about the extent of peat hydrology impacts of infrastructure on peatland, almost the whole of Walshaw Moor's 9 square miles could suffer habitat loss or degradation if the CEP went ahead.

Instead the Biodiversity Preliminary Environmental Report predicts the following habitat loss and degradation:

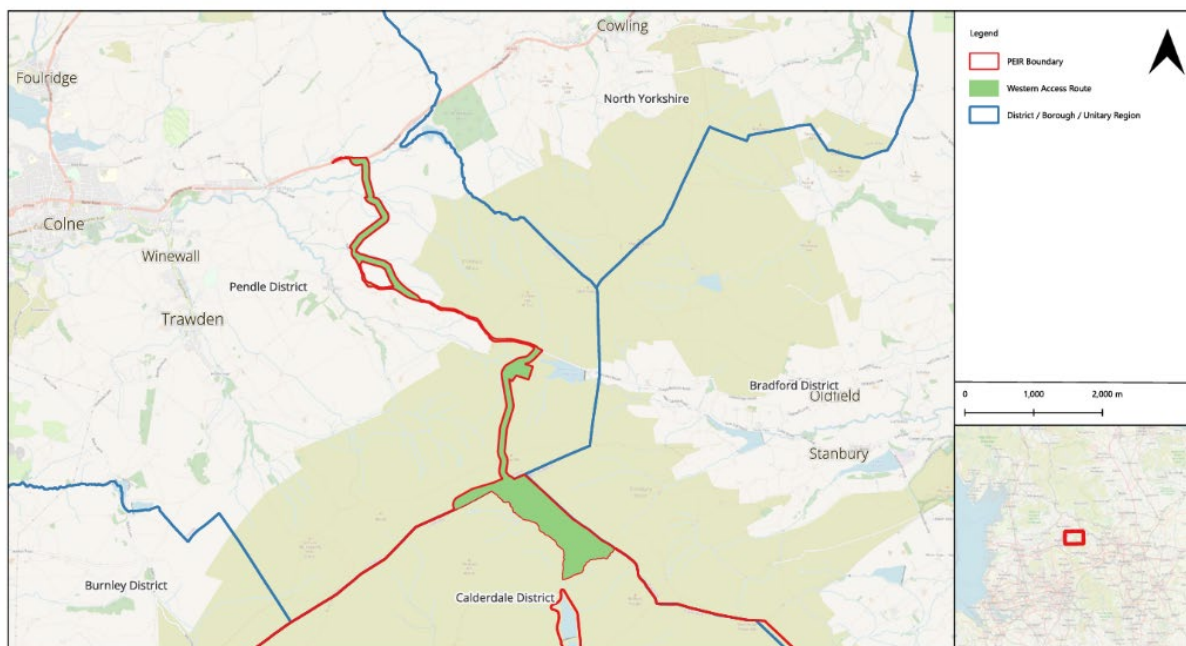
- 67.2 ha as a direct result of the infrastructure footprint
- 80.8 ha as an indirect result of hydrological impacts (the drainage effect)
- 421.71 ha as an indirect result of construction impacts

This is a **tiny fraction** of the potential habitat loss and degradation predicted by current peat science research. Even so, the Applicant has admitted that off-site compensation would be required for damage done to the Special Area of Conservation. We do not believe that it is possible to compensate for such extensive damage to irreplaceable blanket bog.

There is nothing in the Biodiversity Preliminary Environmental Information Report about a long-term land management and monitoring strategy and no recognition that biodiversity impacts could extend well after decommissioning of CEP. Taken all together, these points mean the statutory consultation has been inadequate concerning peat damage.

Crow Hill main access track

The sole access for AIL and all the stone deliveries is up a proposed access track on the north slope of Crow Hill from just west of Watersheddles reservoir to the north apex of the turbine area on Jackson's Ridge, shown on an inadequate CWF Ltd map below:



GENERAL NOTES:

1. This drawing is to be read in conjunction with all engineer's, architect's or other relevant drawings and specifications.
2. All dimensions and levels are subject to detailed design.
3. All works to be carried out in compliance with the requirements of the relevant statutory authorities and regulators.

Drawing Notice:
This site boundary is for indicative purposes only and requires confirmation on site.

Revision History		
Rev	Date	Detail
01	13/03/2025	First Revision

Copyright of Logika Group. Figure dimensions shall be taken in preference to scales. The contractor shall check all dimensions on site before commencing work.

Project/Location
Calderdale Energy Park

Drawing title
Western Access Route

Drawing status
FOR INFORMATION

Client
 Calderdale energy park

Consultant
 Logika CONSULTANTS

Drawing numbers
Figure 3-4

Revision
01

PEIR mapping inadequate

No effective map has been provided by CWF Ltd. The map below is by WTRG:



The 1989 peat slide was set out and analysed in the Scoping Opinion

An analysis of the multiple peat slides on Crow Hill was provided by WTRG in the Scoping Opinion adopted by the Secretary of State on 10th October 2025 p 105-108. In particular, a careful account was given of the 1989 peat slide on Crow Hill, which is repeated below.

“12.9 A second Crow Hill peat slide occurred on 19th May 1989. Dykes and Warburton (Mass movements in peat (2006)) give a photograph of the remnants of the 1989 slide taken in 2005. The extent was 3.6 ha, and 46000 m³. The peat was originally 2-3 metres deep and 0.3-0.5 metres of depth remains. The terrain is not steep and corresponds to the ground crossed by the Crow Hill access road at 440 metres just before the last bend. A prolonged drought had affected England from November 1988, punctuated by short-lived but often abrupt phases of wet weather. On 19th May 1989, a record 2-hour point rainfall of 193 mm was recorded at Walshaw Dean Lodge in the middle of the turbine area. This is the record daily rainfall for May, and the most intense 2-hour rainfall recorded in Britain. It is known as the "Halifax Storm". The 1989 Crow Hill peat slide and 1824 Crow Hill catastrophe had in common intense rain following a drought. Droughts in the Walshaw catchment include 2023 when emergency pipes were laid by helicopter from Walshaw Dean to Ponden reservoirs, and the ongoing drought of Spring and Summer 2025.”

PEIR 10-4 wrongly gives the impression peat slides on Crow Hill are historical

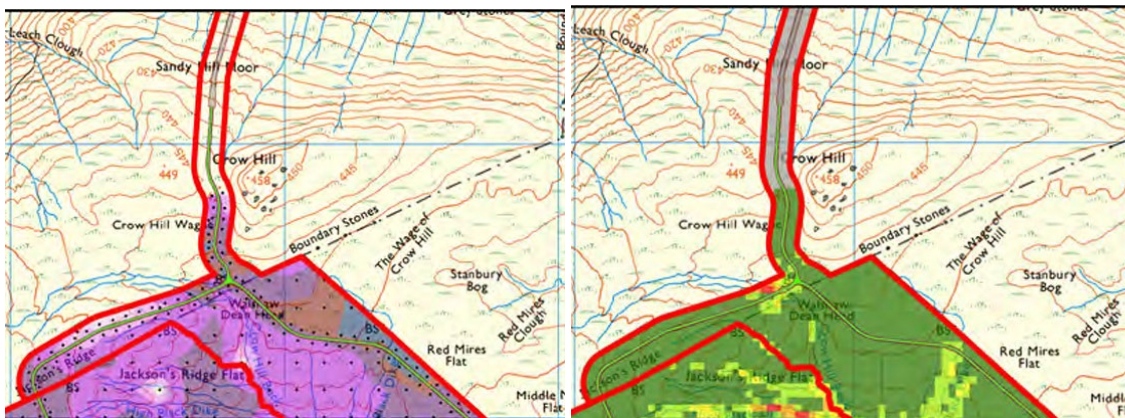
Because OWC failed to find the 1989 Crow Hill peat slide in either of two references they cite, the report concludes that the peat slide risk on Crow Hill is historical. The OWC report states:

“A bog burst was documented on Crow Hill near Haworth by Brontë in 1824, and this is likely the nearest recorded failure to the Turbine Area (Ross, 2021).”

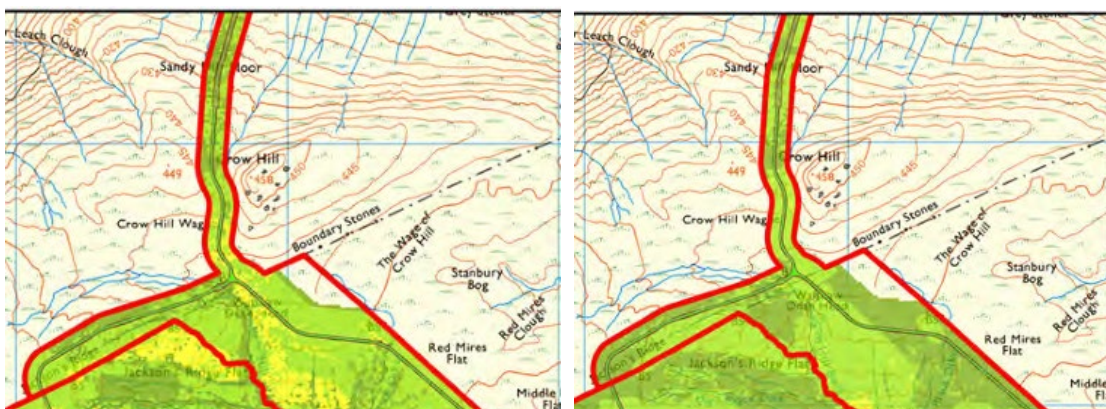
“Outside the Turbine Area to the north, the Crow Hill bog burst (a much reported peat landslide, documented by Rev. Patrick Brontë (Ross, 2020) is located to the west of the Western Access Route. The landslide took place in 1824 (c. 200 years ago), and remains visible in the landscape (Plate 3.3d).”

Map shading gives the false impression that full analysis has been conducted

The two most northerly probes for peat depth in the table in Annex 10.2.2 to Appendix 10-2 have Probe IDs 159 and 160, the latter with northing 436824. These points correspond with the limit of shading in the two maps below which correctly illustrate the data and analysis.



Figures 10.4.6 (Peat Depths) and 10.4.8 (Factor of Safety) above show the limit of peat depth probing was south of Crow Hill summit and that consequently no calculation of Factor of Safety could be made (grey shading in 10.4.8) in the access track corridor. Note that the track is cut-and-fill over Sandy Hill Moor before it is shown as floating in the section passing Crow Hill summit.



However, Figures 10.4.12 Landslide Likelihood (Bog Burst) and 10.4.13 Landslide Likelihood (Peat Slide) shown above have the whole corridor shaded pale green, speckled with dark green, meaning a low or very low likelihood of bog burst and peat slide. 4.3.1-4.3.10 explains the method for calculating the colour in a facet, and a relevant score cannot be found without peat depths. **There is**

no justification for green shading in the corridor north of Crow Hill summit because no peat depths have been found. Shading this area green and dark green constitutes scientific fraud.

Calculation of bog burst and peat slide probability at the convexity in the access track corridor

The corridor is 100 metres wide. The track and drainage will only be 10 metres wide. The track north of Crow Hill is cut through the peat to competent ground. The peat slide risk is greatest on the peat adjacent to this steep, straight, aggregate filled trough, which will act as a French drain. Our assessment relates to the peat remaining in the corridor after the track has been built, which will have lost lateral support.

The PEIR uses two approaches to assess peat slide probability: landslide susceptibility and limit equilibrium. Neither approach can be used without peat depth values, which is why the maps above should not be shaded north of Crow Hill.

WTRG is in a position to assess the peat slide and bog burst risk in the access track corridor using both approaches because we made a peat depth survey on 1st August 2025. We consider the facet at the convexity, as shown to the right.



Landslide susceptibility approach

The failure mode in this facet is likely to be peat slide rather than bog burst. The gradient is too high for bog burst to be likely.

Slope angle (7.5°) score 3

Peat depth (2.3 m) score 3

Substrate (glacial till/granular clay) score 2

Geomorphology (planar) score 2

Drainage feature (downslope) score 0

Profile curvature (convex) score 2

Forestry (not forested) score 0

Land use (machine cutting of track) score 3

Total score 15: table 4.11 puts this score in the middle of the moderate range with a probability 3.

Limit equilibrium approach

The PEIR uses the standard infinite slope equation:

$$F = \frac{c' + (\gamma - h\gamma_w)z \cos^2 \beta \tan \phi'}{\gamma z \sin \beta \cos \beta}$$

WTRG use the tabulated conservative values of the cohesion and internal angle of friction from Table 4-1). The calculation is very sensitive to the cohesion value, as the PEIR observes. WTRG make no claims for the significance of the outcome and simply follow the conservative values (2, 20°) stated in the PEIR:

$$F = \frac{2+(10.5-1 \times 9.8) \times 2.3 \times \cos^2(7.5^\circ) \times \tan(20^\circ)}{10.5 \times 2.3 \times \sin(7.5^\circ) \times \cos(7.5^\circ)} = \frac{3.59}{3.13} = 1.15$$

PEIR 4.2.3 states that any value less than 1.4 is indicative of marginal stability or instability. This confirms that probability assessed by the Landslide Susceptibility approach is certainly at the Moderate level, with the value of F indicating that the facet is high in its class and may in fact be High.

To calculate risk, WTRG now assess the adverse consequences of a peat slide on Crow Hill north slope. Since the track is directly above Watersheddles Reservoir the consequences are high (4) throughout the proposal life, because of the threat to the reservoir, and onward displacement effects to communities downstream of the dam; since the track is the sole access to the wind farm for ALL, the consequences of a peat slide during construction are very high (5) being liable to strand the proposal assets and cause multiple loss of life. Emergency access to the site is available from the A6033 at Cock Hill, so the consequences are not permanently very high: the fire brigade and maintenance teams could attend emergencies via Cock Hill during the proposal lifetime; the peat slide risk to Watersheddles Reservoir and the settlements downstream is permanent.

With a risk score of $3 \times 4 = 12$ (permanent) and $3 \times 5 = 15$ (during construction) the facet has a low Medium, or high Medium risk. Mitigation measures during construction will be essential. Mitigation of the continuous and indefinite risk to Watersheddles Reservoir will be difficult. The primary mitigation would be to build the track elsewhere.

The action suggested in Plate 4.1 (medium risk levels) is: *“Project should not proceed in medium areas unless risk can be avoided or mitigated at the location, without significant environmental impact, in order to reduce risk ranking to low or negligible.”*

Bayesian probability is much higher because of anomalous history and geology of Crow Hill

The calculations done above are relevant to sites chosen at random without reference to history and anomalous geology. The fact is that Crow Hill has a history of peat slides and bog bursts constituting a cluster. The conditional probability of a peat slide on the access track is much higher than the abstract calculations allow. In the landslide susceptibility approach, there is no scoring for previous landslides nearby.

On Crow Hill there is a cluster of peat slides and bog bursts laid out in the PEIR's reference Ross, 2020. Using the counting method of the OWC report there have been eight peat slides or bog bursts recorded on Crow Hill.

1. Crow Hill bog burst 2 September 1824²⁵

2,3,4,5. Four separate peat slides recorded by J. Horsfall Turner on 4 September 1824²⁶

6. Peat eruption recorded by Patrick Brontë c 16 September 1824²⁷

²⁵ Ross, Shawna, Charlotte Brontë at the Anthropocene SUNY (2020) p 37

²⁶ ibid p 41

²⁷ Ibid p 41

make major material changes if they find they cannot mitigate peat slides here, or they may settle for inadequate mitigation. Since the track is existential, in situ peat coring should also have been undertaken, since the use of book values on an area of such importance is inappropriate. **By staging the Statutory Consultation within the nesting bird season, CWF Ltd has prevented consultees from getting the data themselves until 1st August 2026.**

10. The Negative Impact on Tourism and our Literary Heritage

The tourism economy of Walshaw Moor and its connected communities, including Colne, Laneshaw Bridge and Wycoller, is fundamentally linked to experiential landscape qualities.

Visitors are drawn not merely by individual attractions but by the combined experience of:

- open upland moorland;
- remoteness;
- tranquillity;
- wildness;
- dark skies;
- expansive Pennine views;
- literary associations; and
- continuity of landscape character.

These qualities are recognised within Landscape and Visual Impact Assessment (GLVIA3) guidance as legitimate perceptual landscape characteristics. The PEIR inadequately assesses how industrial-scale turbines, substations, access tracks, grid infrastructure and aviation lighting would affect the experiential quality of this landscape.

A route may remain technically open while nevertheless suffering substantial degradation in:

- tranquillity;
- wildness;
- landscape character;
- visual coherence; and
- visitor experience.

Tourism and recreation are not determined solely by physical access. They are also shaped by:

- setting;
- atmosphere;
- scenic quality;
- safety perception;
- tranquillity; and
- emotional experience.

Assumptions within the PEIR that recreational users, equestrians or other visitors will simply adapt to

the presence of industrial-scale turbine infrastructure should therefore be treated with caution.

Even where access technically remains available, the experiential character of routes and recreational landscapes may be fundamentally altered in ways that mitigation cannot fully address.

This is particularly relevant in relation to:

- horse riders;
- walkers;
- fell runners;
- wildlife observers; and
- individuals seeking quiet recreation and landscape escape.

The significance of these routes and landscapes derives not merely from functional access but from the qualities of the surrounding environment itself.

PEIR Ch 13 4.7.13 *In relation to areas associated with the Brontë family, such as Haworth, Top Withins and the surrounding moorland, the preliminary assessment found that the qualities which give these places their recognised cultural value, such as their historic buildings, literary associations and local landscape character, do not rely on clear or uninterrupted long-distance views. Although turbines will be visible from parts of this wider landscape, these views occur at considerable distance, and the ability to appreciate the historic and literary interest of these locations would remain largely unchanged. As a result, effects on the Brontë-related landscape are assessed as minor and not significant.*

No objective baseline evidence for these extreme, subjective and prejudicial opinions is offered.

In response to the Scoping Report of September 2023, Bradford Council wrote:

“The LPA notes that no methodology or suggestions are made in respect of assessing how the proposal would impact upon the heritage significance in relation to the Brontë landscapes and cultural heritage. In general terms, the assessment should cover the visual and heritage impacts of the proposal on the experience and usability of the cultural landscape and its key sites, and its likely economic impacts on local tourism and the international reputation of the area. The LPA notes that some innovation is likely to be required given the unprecedented nature of the proposal in an important cultural landscape such as this. The applicant is, therefore, advised to approach the Brontë Society and Calderdale and adjacent Councils at pre-application stage to understand further the significance of the landscape and to help in establishing a method for comprehensively evaluating potential impacts on the cultural heritage.”

The Brontë Society has not yet been consulted and no baseline evidence on the “*international reputation*” and “*unprecedented nature of the proposal*” has been indicated, let alone advanced. We would expect primary evidence to be adduced in the PEIR, just as it is for ornithology and geology, and that this primary evidence would also be related directly to Walshaw Moor, which is, by archival and on-site research and legal opinion, potentially the statutory setting of the Grade I listed Brontë Parsonage.

A preliminary heritage impact assessment on the framework of the five steps of *The Setting of Heritage Assets* (2017) published by Historic England has been commissioned by Friends of Brontë Country, who have taken ownership of the fifth revision. Such was the extent of the primary field and archival evidence that, despite its preliminary nature, it required 340 hours to complete, even

though the author had direct access to the expertise of one of the greatest living Brontë scholars, Dr Claire O'Callaghan, the commissioning editor of the HIA and editor of Brontë Studies. Given the evidence vacuum in the PEIR, the now compromised credibility of the PEIR author, the difficulties of on-site research in the nesting season, the specialised nature and extent and complexity of the primary archive material, and the shortness of time between the end of the nesting season on July 31st and the projected submission of the DCO application in November, we recommend that CEP consults the Friends of Brontë Country with a view to adopting their HIA.

The environs of Colne form part of the Brontë story. Wycoller Hall is the fictional Ferndean Manor and a Brontë suitor, and former curate, is buried in Christ Church where he was vicar for many years. Any scholar of the Brontës would naturally explore their frequent travels to places like Gawthorpe Hall in the Red Rose county. It is truly amazing that a landscape with such an international reputation among literary lovers, encompassing not only the Brontës, but also Sylvia Plath and Ted Hughes, could be not considered to be a national cultural jewel to be preserved and protected.

The Brontë landscape should be treated as a high-sensitivity cultural landscape receptor in its own right.

Assessment should explicitly consider:

- setting;
- sightlines;
- landscape continuity;
- tranquillity;
- wildness; and
- experiential authenticity.

The introduction of industrial-scale wind infrastructure across deep peat moorland would fundamentally alter the perceived character of this landscape. This concern extends beyond direct visual effects and includes broader impacts upon:

- sense of place;
- literary association;
- tourism identity; and
- cultural continuity.

The PEIR largely transfers PRow and route-access impacts into the Transport and Access chapter. However, the issue for tourism and recreation is not merely route functionality. The issue is the quality of the landscape through which these nationally important recreational routes pass. The assessment therefore risks fragmenting cumulative experiential effects across separate technical chapters.

This is particularly important for:

- the Pennine Way;
- Pennine Bridleway;
- Calderdale Way;
- Mary Townerley Loop;
- upland walking routes;
- fell-running routes; and

- recreational cycling and riding networks.

The tourism and recreational significance of these routes derives heavily from their upland landscape character and sense of escape.

Conclusion

Colne Town Council stands firmly alongside its neighbour, Laneshaw Bridge Parish Council, and the Stronger Together coalition in formally objecting to the Calderdale Energy Park, to the errors and inadequacies in the PEIR and other documents, and to the way in which the consultation process has not been conducted according to the Gunning Principles.

What we see throughout the consenting process (Scoping Reports, Consultations and PEIR) is the attempt to make Walshaw Moor seem retrospectively like a suitable site. There has been a failure to show suitability in the PEIR on all dimensions: SAC, SPA, heritage of world significance, 30by30.

The cumulative effects on:

- landscape character;
- recreation;
- tourism;
- heritage;
- housing;
- road infrastructure and air quality;
- peatland integrity;
- local economy and tourism; and
- community identity

would be substantial and long-lasting. The claimed socioeconomic benefit of a mere 10 long-term operational jobs (or, as Cllr Ash Sutcliffe opined, “around the same number of jobs as in Colne’s town centre Greggs”) patently do not outweigh the widespread infrastructural, ecological, and cultural harms of the proposal.

We consider that the lack of an overall cumulative effects assessment represents one of the most significant shortcomings of the PEIR. Whilst there are cumulative assessments within individual technical chapters, the Council is not satisfied that it adequately captures the way in which impacts will be experienced by affected Colne communities in practice. There is insufficient attention given to the combined consequences of those impacts at community level as that is their lived experiences collectively, simultaneously and over time, especially throughout the construction and operational phases of the development.

A series of individually moderate impacts may collectively result in a far greater burden than is suggested by consideration of those impacts in isolation. This is particularly true where impacts occur concurrently and persist over an extended period. The Council considers that insufficient weight has been given to this issue.

A more robust, locally-specific and evidence-led assessment is therefore required before any conclusion of “no significant adverse effects” could reasonably be supported. It is Colne Town Council’s view that Walshaw Moor is totally unsuitable for industrial-scale wind energy development.

If you wish to discuss or clarify any of the points raised in this response, please contact me or Cllr Sarah Cockburn-Price, the head of our Neighbourhood Plan Advisory Committee.

Yours faithfully

Mrs Gina Langley
Town Clerk