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30th June 2026

Re: - Calderdale Energy Park Nationally Significant Infrastructure Project

The installation of an onshore wind electricity generating facility and associated infrastructure which would allow for the generation and export of electricity with a maximum generating capacity of approximately 240 Megawatts.

Thank you for the opportunity to consult on the developing proposals for Calderdale Energy Park. Our comments set out our key concerns for the scheme in relation to biodiversity impacts based on the information provided in the Preliminary Environmental Information Report (PIER) (April 2026) and associated reports.

Impacts on designated sites

Much of the development area falls within three statutory designated sites: South Pennine Moors Special Area of Conservation (SAC), South Pennine Moors Phase 2 Special Protection Area (SPA) and the South Pennine Moors Site of Special Scientific Interest (SSSI). The SSSI underpins the SAC designation.

Approximately 95% of the Turbine Area, over 2,100 ha, is within the SAC/SPA area and the Western Access Route overlaps with over 126 ha of the SAC. Smaller areas of the SAC will also be impacted by the Eastern Access Route and Bradford West Cable Corridor. The presence of three Annex I habitats and designated features of the SAC have been confirmed in these impacted areas: European dry heaths, Blanket bog and North Atlantic wet heaths with *Erica tetralix*. Two designated habitat features of the SSSI, upland flushes, fens and swamps and upland acid grassland will also be impacted. All of these are Priority Habitats under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

These internationally and nationally important sites will be affected by direct habitat loss of 67.2ha with additional habitat fragmentation impacts, hydrological changes and potential pollution impacts, with the resulting negative consequences for the species dependent on them. Renewable energy developments are undoubtedly important in the transition away from fossil fuels, but this should not come at the expense of adverse impacts to protected sites which are pivotal to the government's nature recovery objectives such as 30 by 30, a legally binding target set out in the Global Biodiversity Framework[1].

The PIER recognises these impacts, stating that "*Given the sensitive nature of the habitats and species present within the Turbine Area in particular, a comprehensive mitigation and compensatory approach is required".* This does not align with the commitment the PIER also gives to 'applying' the mitigation hierarchy

[1] https://www.cbd.int/doc/c/e6d3/cd1d/daf663719a03902a9b116c34/cop-15-l-25-en.pdf

which should see developments avoiding protected sites as a first principle. That both onsite and offsite approaches are expected to be required indicates the scale of the impact to important habitats, but there is little information at this stage of what these approaches would involve. Without this information it is difficult to assess or comment on the viability of such measures. However, in principle, Buglife argues that nationally protected sites are a red line for development and that this is therefore not an appropriate location.

Non-statutory designated wildlife sites will also be impacted by the access routes, including Nan Scar Clough Local Wildlife Site (LWS) and Corn Close and Bent Moor LWS. That LWSs will also be impacted further highlights the important wildlife value of the wider, extensive and connected landscape in its entirety.

Impacts on irreplaceable habitats

The proposals will result in the loss of nearly 32ha of blanket bog in the Turbine Area, an internationally important and irreplaceable habitat as illustrated on the West Yorkshire Local Nature Recovery Strategy map[2]. It is estimated that changes to the hydrology of the site will lead to a further 44ha of habitat loss. This figure is almost certainly set to increase once the impacts are fully understood and quantified across the scheme, with additional degradation impacts and temporary removal increasing the overall area affected.

The IUCN UK Peatland Programme position is that peatlands are not suitable places for windfarms due to adverse impacts and the carbon emissions released by construction[3]. The IUCN UK Peatland Programme includes statutory agencies such as Defra, the Environment Agency and Natural England as Steering Group members[4].

While proposals aim to 'reinstate' excavated peat where it is being temporarily removed, Buglife share the detailed concerns of the Yorkshire Wildlife Trust (comments dated 10th June 2026) on the likely success of mitigation and restoration strategies. Currently, positive ongoing management of the peatland is being undertaken through the Walshaw Moor Catchment Restoration Plan which is in place until 2042, to the benefit of wildlife and people. The Energy Park proposals would be in direct opposition to this Plan, undermining efforts of vital ecosystem restoration.

At this stage, approximately 20ha of upland acid grassland is also to be lost to the proposals, including areas supporting an internationally important waxcap fungi community or 'CHEGD' assemblage (Clavarioid, Hygrocybe, Entomola, Geoglossum and Dermoloma fungal species groups) which are indicators of unimproved and undisturbed ancient grassland habitats. This is a habitat that is very difficult to restore or recreate and therefore has a high irreplaceability value[5]. For these proposals, this grassland should be considered irreplaceable.

The PIER also notes a veteran tree within the Turbine Area, a further irreplaceable habitat and important habitat feature for invertebrates. The report does not address if the tree will be impacted by proposals.

The National Planning Policy Framework states at Paragraph 193. c) "*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.*" As with designated sites, avoidance of impacts for irreplaceable habitats is fundamental for development to be considered in any way sustainable and reinforces that this is not an appropriate location.

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[2] LNRS Map | Local Nature Recovery Strategy - West Yorkshire Local Habitat Map
[3] https://www.iucn-uk-peatlandprogramme.org/development
[4] https://www.iucn-uk-peatlandprogramme.org/about-us
[5] Penny Anderson Associates Ltd (2015) Evidence Gathering on Criteria for Identifying Irreplaceable Habitats. Unpublished report for Natural England.

Invertebrate surveys

The development falls within the South Pennies National Character Area[6] which sets out in its profile the value of the area for invertebrates, stating "*Mosaics of moorland vegetation on the plateaux, including blanket bog and heathland, supporting internationally important habitats and assemblages of upland birds, invertebrates and breeding waders*." The PIER recognises the potential of the mosaic of habitats present in the Turbine Area to support a diverse assemblage of invertebrates and Natural England's consultation also highlighted the potential for rare invertebrates to present on the site.

To date, the Terrestrial Ecology Report details that 'high-level' invertebrate sampling has been undertaken in the Turbine Area with the aim to "*identify the presence/absence of conservation notable species or assemblages of invertebrates*". Buglife is aware that further invertebrate surveys have or are being undertaken, potentially including the Access Routes and Bradford West Cable Corridor but no detail has been provided on the scope of these surveys to be able to comment on their adequacy.

For the Turbine Area, 19 sampling points for invertebrates were undertaken in September/October in 2024. It is to be assumed that these sites were only sampled once but details such as sampling dates and weather conditions are not provided. These details are important in identifying constraints to surveys and should be provided. Surveys identified 139 species, including species of conservation concern, including the Near Threatened freshwater beetle *Stictonectes lepidus*, Nationally Scarce flea beetle *Altica longicollis* and Nationally Scarce River Skater (*Aquarius najas*).

The Ecology Report states that, "*The surveys therefore only provide a late season snapshot of the invertebrate assemblage present within the Proposed Development, identifying communities/areas of interest for which longer term monitoring may be required*". Buglife agree that these surveys are very limited due to the numbers of samples undertaken and survey timing at the end of the active season for many species, particularly for upland habitats. It is therefore concerning that the PIER already presents its conclusion that the Turbine Area has County Value for invertebrates and that the scheme will have a 'low magnitude impact' on invertebrates. Further information is needed before these conclusions can be drawn.

Valuable habitats and features for invertebrates should be surveyed comprehensively through at least six survey dates, from Spring to Autumn for this site, which has high value habitats and for a scheme with substantial impacts[7]. Many invertebrate species and assemblages are associated with very localised and specific habitats, features or combinations, that are not detectable from broad habitat maps or assessments and these need to be identified alongside identifying species of conservation concern. The Environmental Statement needs to ensure that adequate invertebrate surveys have been undertaken across the footprint of the scheme to enable confidence in the full impact assessment and to inform mitigation and management plans.

Aquatic invertebrates

Numerous watercourses and wetland features are present within the development boundary. Buglife welcomes that targeted assessment, and any required surveys will be undertaken for White-clawed Crayfish (*Austropotamobius pallipes*) but is unclear if there will be targeted surveys for other aquatic invertebrates that may be affected by impacts such as crossing points and modifications to watercourses including the installation of culverts. Wetland features that will be subject to impacts beyond those that can be mitigated

[6] https://www.bradford.gov.uk/media/dnchduet/11-07-national-character-area-profile-36-south-pennines.pdf
[7] https://publications.naturalengland.org.uk/publication/36002

through comprehensive pollution control methods should have appropriate invertebrate surveys to determine impacts and inform mitigation.

To summarise, this development is proposed in a very sensitive environment, impacting designated sites and irreplaceable habitats making it a fundamentally unsustainable proposal. The total areas of habitat loss and degradation are yet to be established, but it is clear that high levels of mitigation and compensation would be needed to reduce impacts.

A high value mosaic of habitats for invertebrates is present on site that could support species of conservation concern. There is not currently enough information to assess the adequacy of the invertebrate assessments that have been undertaken or will be undertaken. It is essential that surveys are suitably comprehensive to inform the impact assessment, mitigation and management proposals. This should include both terrestrial and aquatic surveys as needed.

Please do not hesitate to contact us if further information is required on any of the points raised.

Yours sincerely

Gemma Waters
Saving Sites Officer