



Lidgett & Beyond

To: Calderdale Energy Park Project Team / Planning Inspectorate

By Email: info@calderdaleenergypark.co.uk

Date: 10th June 2026

RE: Formal Objection to the Statutory Consultation for the Proposed Calderdale Energy Park (CEP) Onshore Wind Development

Thank you for giving us the chance to review and comment on the CEP Onshore Wind Development. Our comments are below.

By way of introduction, Lidgett and Beyond (L&B) is Colne's largest community group, with over 750 members/supporters. Based in Eastern Colne and also covering Laneshaw Bridge, the group aims to protect and enhance this rural part of Colne Area and has striven against inappropriate development in Eastern Colne, developed The East Colne Way and the Colne Boundary Walk, erected heritage information boards, carried out bulb planting schemes, and played an active role in the development of the Colne Neighbourhood Plan throughout its development.

1. Executive Summary & Statement of Intent

L&B, as a community charity dedicated to safeguarding the local environment, community well-being, and historical legacy of Colne and its surrounding areas, formally submits this objection to the proposed Calderdale Energy Park (CEP) and the whole process of the consultation and the inadequacy and errors in the documents produced and evidence presented by Calderdale Wind Farm Limited (CWF).

While our charity recognises the critical national imperative for renewable electricity generation to support climate and decarbonisation targets, we strongly object to this specific proposal. The Applicant has **fundamentally failed to demonstrate that this site is appropriate**. The Preliminary Environmental Information Report (PEIR) is **severely undermined by profound technical flaws, a lack of developer due diligence, significant geographical errors, and a glaring failure to transparently consult the severely impacted "gateway communities" of Colne and Laneshaw Bridge**.

The current consultation is premature, relies on an unstable, fluctuating evidence base (evidenced by late Errata Reports), and fails to prove that catastrophic environmental, infrastructural, and economic harms can be mitigated, never mind failing to identify such harms as part of conducting due diligence and preparing the PEIR.

L&B is indebted to the work done over several years by the Stronger Together consortium, especially the Walshaw Turbines Research Group (WTRG), in exposing these issues and inadequacies.

Lidgett & Beyond is registered as a Charity, registration number 1163523

Heyroyd, Skipton Old Road, Colne, Lancashire BB8 7AD
T: 01282 868008 M: 07801 468303 E: david@cockburn-price.com
www.lidgettandbeyond.org

2. Procedural Unfairness and the "Gunning Principles" Breach

The pre-application process for CEP represents a major failure in public consultation, leaving our communities open to a legal challenge under the **Gunning Principles** (specifically Gunning 2, which mandates that the public must be given sufficient information to give "intelligent consideration") for the following reasons:

- **Concealment of Aggregate Haulage:** Throughout the four-year development of this project and during the non-statutory consultation ending in June 2025, the word "aggregate" was completely omitted from documentation. The Applicant stated in writing that materials would be sourced from onsite "borrow pits and quarries to the east".
- **The Bait-and-Switch:** Only upon the release of the PEIR did the public discover a massive logistical pivot. As local rock is completely unusable, 616,000 tonnes of hard stone must be imported via the M65, directly traversing the densely settled streets of Colne and Laneshaw Bridge. Our communities were completely excluded from the formative stages of this design iteration.
- **Disproportionate Engagement:** As a vital "gateway community" absorbing the brunt of heavy logistical movements, our area has been ignored. Representatives from Colne and Laneshaw Bridge were largely excluded from the Calderdale Parish Forum until its final, mature stages, treating our living community in East Lancashire as nothing more than an unconsulted transport corridor.

3. The Unresolved "Aggregate Problem" and Traffic Infrastructure Collapse

The materials and logistics frameworks presented in the PEIR are entirely detached from geological reality and local network capacity.

A. Geological Failure of Local Stone

The original project scoping assumed onsite borrow pits would supply track and foundation gritstone materials supplemented by Halifax gritstone. It is certainly true to say that, if they are on suitable sites, wind farm projects of this scale do not usually require large quantities of aggregate to be brought onto the site. However, British Geological Survey Sheet 77 (Huddersfield) explicitly outlines that West Yorkshire sandstones/gritstones are **too weak, highly porous, and susceptible to severe frost damage** for use in high-quality roadstone or concrete. Reputable local builders across Colne and beyond know these aggregates quickly degrade into sand after heavy rainfall.

Furthermore, importing limestone aggregate is impossible, as limestone runoff acts as a toxic "bog poison" to the highly acidic, sensitive sphagnum moss environment of Walshaw Moor. Consequently, hundreds of thousands of tonnes of specialised non-calcareous granite must be imported from outside Yorkshire and Lancashire. It is over two years since CWF 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.

Failure to acknowledge the "aggregate problem" made the Non-statutory Consultation unlawful under Gunning Principle 2. Because this factor had either not been discovered likely through incompetence or ignorance, 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 should have consulted Colne and Laneshaw Bridge about the implications while the proposal was still flexible in its Rochdale envelope.

B. Severe Heavy Goods Vehicle (HGV) Impact

The PEIR specifies a requirement for 196,100 m³ of newly quarried hard stone and 83,900 m³ of recycled railway ballast (totalling 280,000 m³ or 616,000 tonnes). This equates to a staggering **30,800 inbound HGV trips, resulting in 61,600 total HGV journeys** injected directly into our local roads. Over a tight 16-month construction phase, this adds **3,850 heavy monthly vehicle journeys**. The impacts on urban roads in poor condition, already affected by increased volume and weights of vehicles (e.g. SUVs), and on Victorian terrace housing close to the roads have not been assessed nor modelled. This affects thousands of people – see section 4 below.

C. Gridlock on the A6068 Corridor

These thousands of multi-ton stone deliveries will exit the M65 at the Boundary Mill roundabout and push directly through the notorious, pre-existing bottlenecks of Vivary Way, North Valley Road and Windsor Street in Colne. Unlike Abnormal Indivisible Loads (AILs) that can move overnight, these aggregate deliveries will run constantly throughout the day, with the 16% uplift in traffic locking Colne's core transport network into a state of **perpetual traffic gridlock, creating severe pollution and adverse economic impacts**.

As part of recent planning applications, L&B was informed that a 7% uplift in traffic was considered "severe". To have an additional 16% is surely "fundamental", with studies showing it can double or triple travel times, lead to drivers diverting to adjacent residential streets, degrades air quality, and increases safety hazards around schools.

It is worth highlighting that Windsor Street is a **declared Air Quality Management Area** and increased levels of NO₂ and PM₁₀ particles will have a significantly deleterious effect on the respiratory systems of children going to Park High School and Park Primary School as well as the old people in Favordale and Grange nursing homes.

D. The Unviable Horton-in-Ribblesdale Falsehood

To artificially minimise the perceived traffic burden in the PEIR tables, the Applicant depends entirely on a footnote assumption (Chapter 22, Footnote 48) stating that 70% of this hard stone will arrive via a rail head at Horton-in-Ribblesdale.

This is a technical impossibility and a misrepresentation of the facts:

- The rail terminal at Horton-in-Ribblesdale is legally consented and structurally configured **solely for the export of limestone** to reduce HGV movements in the Yorkshire Dales National Park.
- It features absolutely no unloading infrastructure, stockpile pads, or HGV distribution aprons required to receive imported stone.
- Utilising it in reverse to import stone and distribute it via HGV goes completely against its planning purpose. Therefore, 100% of the traffic load must be assumed to fall upon the road route along the M65, then through Colne and Laneshaw Bridge.

Without a credible justification of Horton as a hard stone rail head, the traffic analysis in Chapter 12 is worthless. **If that is the case, the Statutory Consultation has been prima facie unlawful under the Gunning Principles.**

4. Severe Risks to Built Heritage and Victorian Structures

The historic character of Colne and Laneshaw Bridge faces structural risks from this intense cyclic heavy transport strategy.

- **Delamination of Historic Masonry:** Our towns feature a dense concentration of Victorian solid stone-constructed buildings positioned directly adjacent to the proposed haulage route. These structures lack modern foundations and feature multi-layer rubble-fill masonry walls. Continuous, daily heavy vehicle traffic causes these masonry layers to vibrate at differing rates, leading to structural delamination, bulging walls, slipping lintels, and chimney collapses.
- **Cumulative Fatigue:** The PEIR treats traffic passingly, ignoring the daily cyclic loading that permanently weakens timber joints, spiders cracks through windows, and systematically degrades heritage fabric over a prolonged period.
- **Existential Threat to Listed Royd Bridge and several Non-Designated Heritage Assets:** Passing through Colne, the proposed route passes several Non-Designated Heritage Assets (see Colne Neighbourhood Plan - https://colnetowncouncil.org.uk/ctc/wp-content/uploads/2022/08/Colne-Local-Heritage-List-2022-06-Final_compressed.pdf, whilst in Laneshaw Bridge, traffic will bear directly down on the Grade II Listed Royd Bridge, the historic structure from which the village derives its identity and name. The PEIR fails to present any specific structural appraisal, cumulative vibration testing, or accidental strike risk models for any of these valuable buildings/structures.

5. Irreparable Ecological Destruction and Peat Slide Dangers

The industrialisation of the South Pennine Moors—a wilderness containing a Special Area of Conservation (SAC), a Special Protection Area (SPA), and a Site of Special Scientific Interest (SSSI)—violates strict statutory environmental guidelines.

A. Failure to Justify Peatland Siting (NPS EN-3)

The December 2025 National Policy Statement for Renewable Energy Infrastructure (EN-3, paragraphs 2.12.76–2.12.78) explicitly dictates that applicants must **"justify the need for infrastructure to be sited on peatland"** and comprehensively **"rule out other locations"** first. **This is a DESNZ requirement.**

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.'

Because the developer failed to perform adequate site due diligence at the project's inception, they have chosen a highly complex outlier site. The PEIR fails to provide the required comparative baseline evidence or proof of alternative site filtering, relying instead on future management interventions to fix the damage.

At public meetings, people were told that the ecological harm caused by the CEP construction would be outweighed by the green energy generation benefits in under one year. It is widely accepted peat science evidence that **putting windfarms on peatland is likely to undermine the green transition**, not help it.

Walshaw Moor's blanket bog, wet and dry heath are protected as priority habitats by the South Pennine Moor's SAC. It is illegal to damage their ecological integrity. CWF 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.**

B. Catastrophic Peat Slide Risks on Crow Hill

The proposed access tracks traverse the north slope of Crow Hill. This landscape contains a highly unusual, impermeable, and hard local rock formation known as "**Keighley Blue**".

- Rain falling on this summit cannot readily absorb into the rock; it moves laterally along a slippery shear plane right at the boundary where the deep peat meets the impermeable stone.
- Crow Hill already possesses a documented, historically dense cluster of natural peat landslides.
- Cutting a heavy, industrial access track across this slope creates a direct channel for accelerated water runoff, severely increasing the probability of a catastrophic peat burst or peat slide. The developer has shockingly failed to map peat depths along Crow Hill prior to opening statutory consultation, leaving an existential safety risk unassessed.

C. Destruction of Protected Ornithological Ecosystems

Walshaw Moor is a vital stronghold for critically threatened, red-listed bird species, supporting flourishing populations of short-eared owls, dunlin, curlews, lapwings, and golden plovers.

East Colne has seen planning applications for housing estates refused, with one of the grounds given being the impact on the precious ground-nesting locations of the curlew. These birds are very set in their ways regarding nesting sites and are long-lived. Their numbers have been improving in recent years due to the actions of organisations like L&B and the creation of the arts project The Curlew Way.



The extensive, sprawling network of proposed tracks will permanently slice up this unified habitat. Constructing an unnecessary track across Stanbury Bog from Crow Hill to Top Withins will introduce heavy foot traffic, mountain bikes, and off-lead domestic dogs into nesting areas that currently see almost zero human disruption, destroying the fragile breeding equilibrium of these species.

6. Annihilation of Landscape, Tourism, and the 17 Protected Viewpoints

Colne is historically celebrated as one of the country's few true upland hill towns ("*Bonnie Colne o' th'Hill*"). The land around it and across the Moor can be counted as part of the 30by30 target established by over 190 countries at the COP 15 held in Kunming and Montreal. It would be hypocritical on a massive scale for the government to simply ignore this.

- **Manipulated Visual Modelling:** The developer's consultants intentionally avoided modelling the impact from the **17 protected town viewpoints** established by the Colne Neighbourhood Plan to preserve this unique landscape context. Strikingly, when asked why the only visual model provided for Colne was taken from inside Colne Cemetery, the developer's leadership team flippantly quipped: "We modelled it from there because then there would be no complaints!".
- **Annihilation of Brontë Heritage:** This project places massive, industrial turbine structures directly into the culturally sensitive Brontë Country landscape. The Friends of Brontë Country commissioned an independent Heritage Impact Assessment (HIA) involving 340 hours of expert archival research, revealing that the industrialisation of these moorland sightlines will destroy the experiential authenticity, literary associations, and wilderness

identity that drives our local tourism and recreational economy. The PEIR leaves this vast cultural value completely unassessed.

7. Severe Technical Incompetence and Lack of Developer Due Diligence

The sheer frequency of **gross technical errors** inside the official PEIR entirely destroys the credibility of the document, proving it cannot be relied upon by the Planning Inspectorate.

- **Incorrect Master Turbine Locations:** In the core launch documents, the master location Table 4-1, which lists the millimetric coordinates of the turbines, was completely wrong and failed to match the project's own physical maps. Five entire turbine plots were mismatched, showing a total lack of internal data control. Further analyses relying on these locations are therefore also undermined.
- **Elementary Scientific & Naming Errors:** Earlier scoping and consultation materials from this developer featured basic electrical engineering errors, such as listing the UK National Grid voltage as "440 Kelvin Volts" instead of 400 kilovolts (kV)—confusing absolute temperature units with electrical voltage while using American grid metrics. Furthermore, the inability to get correct road names and numbers (M65 not M56, etc etc) shows a lack of research and a lack of care.
- **The Developer's Background:** Research by WTRG reveals that the shell companies driving this massive infrastructure proposal (such as CWF and Worldwide Renewable Energy Global Ltd) are led by individuals with no successful history of wind farm delivery, but rather a background marred by immediate involuntary strike-offs and dissolved shell entities. This lack of developer expertise explains why the environmental and physical realities of our local geography have been so poorly assessed. The vital point is that most consented wind farms are developed by established companies (SSE, 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

8. Conclusion and Required Next Steps

Lidgett & Beyond stands firmly alongside Colne Town Council, Laneshaw Bridge Parish Council, and the Stronger Together coalition in **formal objection** to the Calderdale Energy Park. The claimed socioeconomic benefit of a mere 10 long-term operational jobs is overwhelmingly cancelled out by the widespread infrastructural, ecological, and cultural harms of the proposal.

What we see throughout the consenting process (Scoping Reports, Consultations and the 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.

Regarding the key point on alternatives, 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 is no site in England less suitable than Walshaw Moor.** As corroboration, Friends of the Earth and Exeter University's study of suitable wind farm sites, 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

L&B also considers 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, this does not adequately capture the way in which impacts will be experienced by affected Colne and Laneshaw Bridge 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 cumulative burden than is suggested by consideration of those impacts in isolation.

We demand that the Planning Inspectorate halt this process and **ideally reject the proposal outright**. If it is minded to progress, the Applicant should be required to:

1. Carry out a full consideration of **alternative sites**, as required by law.
2. Model and publish visual impact assessments for all **17 Protected Viewpoints** established in the Colne Neighbourhood Plan.
3. Model and assess the effect on **traffic and the knock-on impacts** on the AQMA and nearby housing.
4. Conduct an **overall cumulative effects assessment** incorporating landscape character, recreation, tourism, heritage, housing, road infrastructure and air quality, peatland integrity, local economy and tourism, and community identity.
5. Formally re-classify Colne and Laneslaw Bridge as **Host Communities** due to their role as principal logistical gateways.
6. Execute a **completely new round of statutory consultation** once these vast gaps in the evidence base are corrected, if that is even possible, and made transparently available for public scrutiny.

If you wish to discuss or clarify any of the points raised in this response, please contact me or one of my fellow L&B Trustees.

Yours faithfully,



David Cockburn-Price
Chairman of the Trustees
Lidgett & Beyond Charity