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By email: [info@calderdaleenergypark.co.uk](mailto:info@calderdaleenergypark.co.uk)

Dear Sir or Madam,

**LANESHAW BRIDGE PARISH COUNCIL – RESPONSE TO THE STATUTORY  
CONSULTATION ON CALDERDALE ENERGY PARK**

I write on behalf of Laneshaw Bridge Parish Council, as the Chair of the Council, to present the Council's agreed response to the Statutory Consultation for Calderdale Energy Park.

**SECTION 1 – EXECUTIVE SUMMARY**

Laneshaw Bridge Parish Council welcomes the opportunity to respond to the statutory consultation on Calderdale Energy Park. The Council recognises the importance of renewable energy generation in addressing climate change, improving energy security and supporting the transition to a lower-carbon economy. The Council also recognises the national need for renewable electricity generation identified within National Policy Statements EN-1 and EN-3 and accepts that onshore wind development has an important role to play in achieving those objectives.

The Council's objection to Calderdale Energy Park is therefore not an objection to renewable energy in principle. Rather, it is based upon the Council's conclusion that the Applicant has not demonstrated that this particular proposal has been sufficiently developed, assessed or consulted upon to enable informed decision-making or to establish that its impacts can be satisfactorily avoided, mitigated or compensated.

Having reviewed the Preliminary Environmental Information Report (PEIR), supporting technical documentation, consultation materials, published corrections and the extensive technical analysis prepared by Stronger Together, the Council has concluded that significant uncertainty remains

across a number of critical environmental, transport and community issues. The Council is not satisfied that the information currently available provides a sufficiently reliable basis upon which consultees can fully understand the likely consequences of the proposal or reach informed conclusions regarding its acceptability.

A fundamental concern is that consultation has taken place whilst important elements of the proposal remain unresolved. Key mitigation measures, ecological compensation proposals, community benefit arrangements and environmental management strategies continue to evolve. In a number of topic areas, conclusions regarding environmental effects rely upon future plans, future approvals and future mitigation measures that have not yet been finalised. Whilst some degree of refinement is inevitable within major infrastructure projects, the Council considers that the current consultation has taken place before the proposal has reached a sufficiently mature stage of development.

The publication of a formal Errata Report during consultation has further undermined confidence in the robustness of the evidence base. The Council accepts that corrections can occur within projects of this complexity. However, where corrections relate to information that underpins multiple environmental assessments, consultees are entitled to question whether the conclusions derived from that information remain reliable and whether they have been provided with a fair opportunity to understand the implications of those changes.

The Council is also concerned that the PEIR fails to adequately assess the unequal distribution of impacts across affected communities. Whilst considerable attention is given to the overall significance of environmental effects, insufficient consideration is given to which communities will experience those effects and to what extent. In the Council's view, this is one of the most significant shortcomings of the assessment.

Laneshaw Bridge occupies a distinctive position within the project area. Unlike many communities whose primary concern may be the operational presence of turbines within the wider landscape, Laneshaw Bridge is likely to function as one of the principal gateway communities for the development and is expected to experience a disproportionate concentration of construction-related impacts. These include construction traffic, aggregate haulage, abnormal load movements, temporary traffic management measures, noise, vibration, air quality impacts, community severance and impacts upon heritage assets. Despite this, the Council has been unable to identify any dedicated assessment of gateway community impacts within the PEIR.

The Council considers that the assessment repeatedly treats Laneshaw Bridge as part of a transport corridor whilst giving insufficient attention to the

consequences for the community itself. Residents will not experience transport, health, heritage, air quality and community impacts as separate technical disciplines. They will experience them collectively throughout the construction period. The Council therefore concludes that the cumulative burden likely to be placed upon Laneshaw Bridge has been materially underestimated.

Transport and access remain among the most significant unresolved issues associated with the proposal. The Council is not satisfied that the PEIR adequately reflects real-world traffic conditions, the strategic importance of the A6068 corridor or the consequences of route non-compliance and diversionary behaviour. Particular concern arises in relation to School Lane and the Grade II Listed Royd Bridge, which forms part of the historic identity of the village. The Council has seen no evidence that the consequences of congestion-related diversion, inappropriate routing or sustained pressure on sensitive local roads have been comprehensively assessed.

The Council also supports many of the substantive concerns raised by Stronger Together regarding transport assumptions, aggregate haulage, peatland disturbance, hydrology, ecology, ornithology and cumulative effects. Whilst the Council does not rely upon those concerns as a substitute for its own analysis, it considers that they raise legitimate and significant questions regarding the robustness of the evidence presented by the Applicant.

Particular uncertainty remains regarding peatland, hydrology and the water environment. The development is proposed within a highly sensitive upland landscape containing extensive peat deposits, blanket bog habitat and important reservoir catchments. The Council is not satisfied that the Applicant has demonstrated that significant peat disturbance, hydrological change and associated environmental risks can be avoided. Excessive reliance is placed upon future restoration measures and management interventions whose effectiveness has yet to be demonstrated.

Similarly, the Council is not satisfied that the ecological and ornithological implications of the proposal have been adequately resolved. Important mitigation and compensation measures remain under development and the Council considers it premature to conclude that impacts upon internationally protected habitats and species can be satisfactorily addressed. Given the proximity of the South Pennine Moors SPA, SAC and SSSI, a precautionary approach is both justified and necessary.

The Council is also concerned that the wider implications for landscape character, heritage significance, recreation and tourism have not been fully understood. The South Pennine uplands are not simply a visual resource but a nationally important cultural landscape shaped by centuries of environmental, historical and human activity. In the Council's view, the

cumulative consequences of large-scale energy infrastructure for landscape character, heritage assets, recreational experience and community identity have been understated within the current assessment.

Beyond environmental matters, the Council is concerned that Laneshaw Bridge has not been engaged proportionately to the level of impact likely to be experienced. Representatives of the Parish Council were only invited to participate in the Calderdale Parish Forum during its later stages despite the village's likely role as a principal gateway community. Whilst the Council does not suggest this omission was deliberate, it reinforces a wider perception that Laneshaw Bridge has been regarded primarily as a route through which construction traffic will pass rather than as a community likely to experience significant effects.

The Council is equally concerned by the lack of clarity surrounding community benefit and legacy arrangements. If Calderdale Energy Park proceeds, the Council believes that Host Community status should be determined by the nature and extent of impacts experienced rather than by proximity to turbines alone. Given the scale of construction-related impacts likely to affect the village, Laneshaw Bridge should be recognised as a Host Community and should receive a proportionate share of any future community benefit arrangements.

Taken together, the issues identified throughout this representation demonstrate that substantial uncertainty remains regarding the environmental, transport, heritage and community consequences of Calderdale Energy Park. The Council does not consider that the Applicant has demonstrated that those impacts are fully understood or capable of being satisfactorily mitigated. Nor does the Council consider that the current consultation has enabled informed participation on the basis of a sufficiently complete, stable and reliable evidence base.

Accordingly, Laneshaw Bridge Parish Council formally objects to Calderdale Energy Park in its current form.

The Council requests that further assessment be undertaken in relation to gateway community impacts, transport, cumulative effects and other unresolved matters identified throughout this representation. The Council further requests that a further round of consultation be undertaken once the proposal, environmental assessments, mitigation measures, compensation arrangements and community benefit proposals have been finalised and are capable of meaningful scrutiny.

Until such time, the Council maintains its objection and reserves the right to submit further representations as additional information becomes available.

## **SECTION 2 – INTRODUCTION**

Laneshaw Bridge Parish Council submits this representation in response to the statutory consultation being undertaken by Calderdale Energy Park Limited pursuant to Sections 42, 47 and 48 of the Planning Act 2008.

The Council recognises that Calderdale Energy Park is being promoted as a Nationally Significant Infrastructure Project and that substantial weight is afforded within national policy to the delivery of renewable energy infrastructure. The Council accepts the national need for renewable electricity generation and recognises the important contribution that onshore wind energy can make towards meeting climate, energy security and decarbonisation objectives.

The purpose of this representation is not to challenge the principle of renewable energy generation. Rather, it is to consider whether the Applicant has demonstrated that Calderdale Energy Park has been sufficiently developed, assessed and consulted upon to enable informed decision-making and whether the impacts of the proposal have been shown to be acceptable in environmental, transport, heritage and community terms. Having reviewed the consultation material, the PEIR and supporting technical documentation, the Council's conclusion is that the Applicant has not yet discharged that burden. Significant uncertainty remains regarding a number of important aspects of the proposal and the Council does not consider that the current consultation has been undertaken on the basis of a sufficiently complete and stable evidence base.

A central theme running throughout this representation is the distinction between the overall impacts of the proposal and the distribution of those impacts across affected communities.

The Council considers that the PEIR places considerable emphasis upon the overall significance of environmental effects but gives insufficient attention to the extent to which those effects are concentrated within particular communities. This issue is especially important because the impacts associated with Calderdale Energy Park are unlikely to be experienced equally across the study area.

No community illustrates this issue more clearly than Laneshaw Bridge. The Council considers that Laneshaw Bridge is likely to function as one of the principal gateway communities associated with Calderdale Energy Park and may experience a disproportionate concentration of construction-related impacts arising from traffic movements, aggregate haulage, abnormal load deliveries, traffic management measures and associated disruption. Whilst many communities may experience operational effects associated with the completed development, Laneshaw Bridge is likely to experience the project most directly through the construction phase.

The Council is concerned that this distinction is not adequately recognised within the PEIR. Throughout the assessment, Laneshaw Bridge is frequently considered within transport modelling, route planning and access arrangements. Far less attention is given to the cumulative implications of those activities for the community itself.

The Council therefore considers that an important question arising from this consultation is whether the PEIR adequately captures the unequal distribution of impacts across affected communities and whether sufficient weight has been given to the consequences for gateway communities such as Laneshaw Bridge.

Accordingly, this representation focuses not only upon the environmental effects of Calderdale Energy Park but also upon the way those effects are assessed, distributed and experienced. Particular attention is given to the adequacy of the consultation process, the robustness of the evidence base, the treatment of uncertainty within the PEIR and the position of Laneshaw Bridge as a gateway community likely to experience a disproportionate share of construction-related impacts.

For the reasons set out in the chapters that follow, the Council maintains its objection to Calderdale Energy Park in its current form and considers that substantial further assessment, clarification and consultation are required before any Development Consent Order application can be properly evaluated.

### **SECTION 3 – PLANNING AND POLICY CONTEXT**

Calderdale Energy Park is being promoted as a Nationally Significant Infrastructure Project and therefore falls to be determined within the framework established by the Planning Act 2008 and the relevant National Policy Statements.

The Council fully accepts that national energy policy places substantial weight upon the delivery of renewable energy infrastructure. The need for additional renewable electricity generation is clearly identified within National Policy Statements EN-1 and EN-3 and reflects wider Government objectives relating to climate change, energy security and the transition to a net-zero economy.

The Council does not dispute the national need for renewable energy development. However, the existence of national need does not remove the requirement for robust environmental assessment, meaningful consultation or a clear understanding of likely impacts. National Policy Statements do not create a presumption that renewable energy proposals should be approved irrespective of their consequences. Rather, they require decision-makers to balance the benefits of development against its environmental, social and economic effects on the basis of reliable evidence.

In the Council's view, the principal question arising from this consultation is whether the Applicant has demonstrated that this particular proposal has been sufficiently developed, assessed and consulted upon to enable informed decision-making.

The Planning Act 2008 places considerable importance upon pre-application consultation. The purpose of consultation is not merely procedural. It is intended to ensure that affected communities, local authorities and statutory consultees are provided with sufficient information to understand proposals, identify concerns and influence project development before an application is submitted.

The Council's position is that this objective has not yet been achieved. Throughout the consultation material there remain important areas where assessment, mitigation, compensation or project design continue to evolve. Whilst some refinement is inevitable within projects of this scale, the Council does not consider that consultees should be expected to reach conclusions on matters that remain subject to ongoing development. Meaningful consultation requires a sufficiently stable and reliable evidence base. The Council is not satisfied that such a position has yet been reached.

National Policy Statement EN-1 places significant emphasis upon the quality, transparency and completeness of environmental information available to decision-makers. Environmental assessment is intended to provide a clear understanding of the likely significant effects of development before consent is granted. It is not intended to defer the resolution of fundamental uncertainties to future management plans or post-consent approvals.

The Council considers that this principle is particularly relevant to Calderdale Energy Park. In a number of topic areas, conclusions regarding acceptability rely heavily upon future mitigation measures, future management plans and future compensation proposals that have yet to be finalised. Whilst such measures may ultimately prove effective, the Council does not consider that their future existence is, in itself, sufficient evidence that impacts can be satisfactorily addressed.

The Council also notes the importance placed within EN-1 upon cumulative assessment. Environmental effects are not experienced in isolation and decision-makers must understand how impacts interact and accumulate over time.

This issue is especially relevant to Laneshaw Bridge. The Council's position is that the PEIR gives insufficient consideration to the cumulative burden likely to be experienced by communities that occupy key positions within the construction access strategy. In particular, the Council has been unable to identify any assessment that adequately evaluates the combined effects of

transport, construction activity, community disruption, heritage impacts and changes to local environmental quality on gateway communities such as Laneshaw Bridge.

National Policy Statement EN-3 is similarly relevant. Whilst EN-3 identifies substantial benefits associated with renewable energy development, it also recognises the need for careful consideration of impacts upon landscape, biodiversity, peatland, hydrology, transport infrastructure and local communities.

The Council does not consider that the existence of national need diminishes the importance of these considerations. Rather, the scale of the proposal and the sensitivity of the receiving environment increase the importance of ensuring that impacts are properly understood before conclusions are reached regarding acceptability.

This is particularly significant given the environmental importance of the South Pennine landscape, the presence of internationally designated ecological sites, the sensitivity of peatland and reservoir catchments and the role of Laneshaw Bridge as a community likely to experience a disproportionate share of construction-related effects.

The Council is also mindful that where uncertainty exists regarding impacts upon designated habitats, protected species, sensitive peatland environments or designated heritage assets, the burden rests with the Applicant to demonstrate that adverse effects can be avoided, mitigated or satisfactorily addressed. The Council does not consider that uncertainty should be interpreted as evidence of no effect.

For the reasons set out throughout this representation, the Council is not satisfied that the Applicant has yet demonstrated that Calderdale Energy Park meets the standards of evidential robustness, environmental assessment and informed participation expected by the Planning Act 2008, National Policy Statement EN-1 and National Policy Statement EN-3.

Accordingly, the Council maintains its objection to the proposal and considers that further assessment, clarification and consultation are required before any Development Consent Order application can be properly evaluated.

#### **SECTION 4 – CONSULTATION PROCESS AND ADEQUACY OF THE PEIR**

A principal concern arising from the statutory consultation is whether the information currently available is sufficient to enable affected communities, local authorities and other consultees to properly understand the likely impacts of Calderdale Energy Park and to participate in the consultation process on an informed basis.

The Parish Council recognises that major infrastructure projects evolve during the pre-application stage and that consultation forms part of an iterative design process. The Council does not suggest that every aspect of a proposal must be finalised before consultation can take place. Indeed, effective consultation often requires engagement before designs become fixed.

However, there is an important distinction between consulting on a developing proposal and consulting on a proposal where significant aspects of the environmental assessment, mitigation strategy and supporting evidence remain unresolved. Having reviewed the PEIR and supporting documentation, the Council is concerned that the current consultation falls into the latter category.

The Council's concern is not based upon any single issue. Rather, it arises from the cumulative effect of multiple uncertainties, corrections, omissions and unresolved matters that collectively make it difficult to understand precisely what is being proposed, how impacts will be mitigated and what the final form of the project will be at the point a Development Consent Order application is submitted.

One of the most significant issues is the publication of the PEIR Errata Report. The Council accepts that errors can occur in projects of this complexity and does not suggest that the existence of an errata document is, in itself, evidence of a fundamentally flawed assessment. However, the nature of the corrections is important. The correction of turbine coordinates and other project information is not a minor administrative matter. Turbine locations form a fundamental input into numerous environmental assessments, including landscape and visual assessment, cultural heritage assessment, ecology, ornithology, hydrology, peatland assessment and cumulative effects analysis. Where information of this significance requires correction after publication, it is reasonable for consultees to question whether the conclusions derived from that information remain reliable.

The issue is not simply whether the corrections have now been made. The issue is whether consultees have had a fair opportunity to understand how those corrections affect the assessment outcomes presented throughout the PEIR. The Council has seen limited evidence demonstrating how corrected information has altered, or failed to alter, conclusions across the wider environmental assessment. This creates uncertainty regarding the robustness of the evidence base upon which consultation responses are expected to be provided.

The Council is also concerned by the number of environmental topics where mitigation measures remain under development. Throughout the PEIR there are repeated references to ongoing work, future management plans, compensation strategies and further assessment. This is particularly evident in relation to ecology, ornithology, habitat compensation, peatland restoration

and environmental management measures. Whilst the Council recognises that some details will inevitably continue to evolve, there is a point at which the absence of key mitigation information prevents consultees from forming a reliable view on the acceptability of identified impacts.

For example, where significant ecological effects are identified but compensatory habitat measures remain under development, consultees are effectively being asked to comment on impacts before knowing how those impacts are intended to be addressed. Similarly, where environmental effects are said to be manageable through future management plans that have not yet been prepared, it becomes difficult to evaluate the effectiveness, deliverability or enforceability of those measures.

The Council considers that this issue extends beyond individual environmental disciplines. It affects the overall quality of consultation because consultees cannot reasonably assess whether impacts are acceptable if the measures intended to mitigate those impacts remain largely undefined.

The Council is similarly concerned about the extent to which key aspects of the transport strategy remain dependent upon future management measures. The Outline Construction Traffic Management Plan contains a substantial range of proposed controls, monitoring arrangements and compliance measures. However, many of the conclusions presented within the PEIR appear to assume that those measures will operate successfully and consistently throughout the construction period. Whilst such assumptions may ultimately prove correct, consultees have been provided with limited evidence demonstrating how compliance will be achieved in practice or how potential failures will be addressed.

This issue is particularly important for communities such as Laneshaw Bridge that are likely to experience a disproportionate share of construction-related traffic impacts. The consequences of route non-compliance, diversionary behaviour and congestion-related route choice are central to understanding the real-world effects of the development. Yet these matters often appear to be addressed through future management commitments rather than through detailed assessment of likely outcomes.

The Council also notes that important matters relating to community benefit, legacy arrangements and Host Community recognition remain unresolved. The Applicant's consultation materials refer extensively to the potential benefits that Calderdale Energy Park may bring to local communities. However, relatively little information has been provided regarding the governance, allocation criteria, distribution methodology or geographical scope of those benefits. This makes it difficult for consultees to understand how communities bearing significant impacts will be recognised and whether proposed arrangements are proportionate to the impacts experienced. The Council considers that consultation on community benefit arrangements is

inherently limited where the arrangements themselves have not yet been defined.

A further concern relates to the overall accessibility of the consultation process. The volume of documentation associated with Calderdale Energy Park is substantial. The Council recognises that this is inevitable for a project of this scale. However, the practical consequence is that local communities, parish councils and voluntary groups are required to review thousands of pages of technical information within a relatively limited timeframe. This places considerable reliance upon the accuracy, consistency and completeness of the material presented.

Where corrections are issued, assessments continue to evolve and mitigation remains under development, the burden placed upon consultees increases significantly. Local communities do not have access to the resources available to project promoters and are therefore heavily dependent upon the consultation material itself to provide a clear and stable understanding of the proposal. The Council is concerned that this has not always been achieved.

Particular concern arises from the treatment of Laneshaw Bridge throughout the consultation process. As discussed elsewhere in this representation, the village appears likely to experience a disproportionate share of construction-related impacts due to its position on a principal access corridor. Despite this, representatives of Laneshaw Bridge Parish Council were only invited to participate in the Calderdale Parish Forum during its later stages. Whilst the Council does not suggest any deliberate exclusion, the effect has been that a community likely to experience significant impacts has had fewer opportunities to engage with project development than may reasonably have been expected. This issue reinforces a wider concern that Laneshaw Bridge has not been recognised proportionately to the level of impact it may experience.

The Council acknowledges that the Applicant has undertaken a significant programme of engagement and consultation activity. The Council does not seek to dismiss that effort. However, consultation should be judged not only by the number of events held or documents published but also by whether affected communities have been provided with sufficient information to understand the proposal and influence its development. In the Council's view, that standard has not yet been met.

The Council's position is not that consultation should cease until every issue has been resolved. Rather, the Council considers that a further round of consultation should be undertaken once the project design has stabilised, corrections have been fully incorporated, mitigation measures have been finalised and outstanding environmental uncertainties have been addressed. Such an approach would allow consultees to comment on the proposal that

is actually intended to be submitted rather than on a scheme that remains subject to ongoing revision.

The Council therefore concludes that the current consultation has been undertaken at a stage when too many important matters remain unresolved. The cumulative effect of corrections, evolving assessments, incomplete mitigation measures and limited information regarding key project elements has reduced the ability of consultees to participate on a fully informed basis. This issue is particularly significant in the context of a Nationally Significant Infrastructure Project, where the quality of pre-application consultation is intended to form a cornerstone of the decision-making process.

For these reasons, the Council considers that additional consultation should be undertaken before any Development Consent Order application is submitted and that substantial weight should be given to the limitations of the current consultation process when assessing the adequacy of the Applicant's pre-application engagement.

## **SECTION 5 – GATEWAY COMMUNITY IMPACTS**

The Council considers that one of the most significant shortcomings of the PEIR is the absence of any dedicated assessment of communities likely to experience a disproportionate concentration of construction-related impacts.

Whilst the PEIR contains extensive assessment of environmental effects across a range of technical disciplines, it gives limited consideration to the way in which those effects are distributed between affected communities. The Council considers this to be particularly important because the impacts associated with Calderdale Energy Park are unlikely to be experienced equally across the study area.

Laneshaw Bridge occupies a distinctive position within the proposed development.

The village is expected to form a principal access corridor for construction traffic, aggregate haulage, abnormal load deliveries and associated construction activity. As a result, residents are likely to experience a concentration of construction-related impacts that differs materially from the impacts experienced by communities whose primary interaction with the development will occur during its operational phase.

The Council considers that this distinction has not been adequately recognised within the PEIR.

Throughout the assessment, Laneshaw Bridge is frequently considered as part of a transport route. However, there is little evidence that the cumulative implications for the community itself have been examined in a coordinated or integrated manner.

The Council's concern is not limited to traffic movements alone. Residents are likely to experience the combined effects of increased construction traffic, aggregate haulage, abnormal load movements, temporary traffic management measures, changes in environmental quality, disruption to established travel patterns, impacts upon heritage assets and wider effects upon community wellbeing. Whilst many of these matters are addressed individually within the PEIR, the Council has been unable to identify any assessment that considers their collective effect upon Laneshaw Bridge as a community. This omission is significant.

The Council considers that the environmental consequences of major infrastructure projects cannot be understood solely through consideration of individual technical disciplines. Communities experience impacts collectively and over time. Where a community occupies a key position within the construction access strategy, it is necessary to understand not only the significance of individual effects but also their cumulative burden. The Council is not satisfied that this has been achieved.

The issue is particularly important because construction effects, although temporary in planning terms, may persist for a number of years and have a material influence upon daily life, community cohesion and perceptions of place. The duration and intensity of these effects are relevant considerations when assessing their overall significance.

The Council is also concerned that the current assessment framework risks understating impacts where individual effects fall below established significance thresholds but nevertheless combine to create a substantial burden for affected communities. In the Council's view, this is a realistic risk in relation to Laneshaw Bridge.

The Council therefore concludes that the PEIR does not provide a sufficiently robust assessment of the impacts likely to be experienced by communities that occupy key positions within the proposed construction access network. A dedicated Gateway Community Impact Assessment should be prepared prior to submission of any Development Consent Order application.

Such an assessment should bring together transport, construction activity, environmental quality, heritage, health and community impacts into a single integrated assessment of those communities expected to experience a disproportionate concentration of project-related effects.

Until such work has been undertaken, the Council is not satisfied that the consequences of Calderdale Energy Park for Laneshaw Bridge are fully understood and therefore maintains its objection to the proposal.

## **SECTION 6 – TRANSPORT, AGGREGATE HAULAGE, THE A6068 CORRIDOR, SCHOOL LANE AND ROYD BRIDGE**

Transport and access represent one of the most significant unresolved issues associated with Calderdale Energy Park and one of the areas where the Council considers the PEIR to be least convincing. Whilst the Applicant has undertaken substantial transport assessment work and prepared an Outline Construction Traffic Management Plan (oCTMP), the Council remains unconvinced that the assessment adequately reflects real-world traffic conditions, the strategic importance of the A6068 corridor or the particular vulnerabilities of Laneshaw Bridge.

The Council's concerns extend beyond the volume of traffic generated by the proposal. The principal issue is how that traffic will interact with an existing road network that already experiences congestion, diversionary traffic and capacity constraints. In the Council's view, the PEIR places excessive reliance upon idealised assumptions regarding route compliance and traffic management whilst giving insufficient attention to how drivers behave under actual operating conditions.

The Applicant's own Outline Construction Traffic Management Plan recognises that traffic management is a critical issue. The proposed use of route monitoring, GPS tracking, contractor controls, reporting procedures and enforcement mechanisms demonstrates that the Applicant acknowledges the risk of inappropriate vehicle movements and route deviations. However, the Council is concerned that whilst these measures are proposed as mitigation, the consequences of those risks occurring have not been adequately assessed within the PEIR itself.

The distinction is important. Environmental assessment should not be limited to evaluating a scenario in which every driver behaves exactly as intended and every management measure operates perfectly. Rather, it should consider foreseeable outcomes under realistic operating conditions. The Council is concerned that the PEIR frequently assesses the intended operation of the transport strategy rather than the likely operation of the transport strategy. This issue is particularly relevant in relation to the A6068 corridor.

The A6068 is not a minor local road. It is a strategically important east-west route linking Lancashire and West Yorkshire and provides an alternative route during periods of disruption on the M62 motorway. Residents of Laneshaw Bridge are well aware that traffic conditions on the A6068 can change dramatically when incidents occur on the motorway network. Significant volumes of traffic are frequently diverted through the area during such events, resulting in congestion, delays and increased pressure on local roads. The Council has been unable to identify any meaningful assessment of how Calderdale Energy Park construction traffic would interact with these conditions.

The transport assessment appears largely based upon normal operating conditions. Whilst this may be appropriate for baseline modelling, it does not

adequately reflect the realities of the corridor. A transport strategy that performs acceptably under normal circumstances may perform very differently when subjected to motorway diversions, major incidents, adverse weather conditions or seasonal traffic peaks.

The Council therefore considers that the transport assessment should include sensitivity testing for abnormal network conditions, including motorway diversion scenarios and periods of severe congestion. Without such analysis it is difficult to have confidence that the conclusions presented within the PEIR accurately reflect likely conditions during the construction period.

A further concern relates to aggregate haulage. The Council considers that aggregate movements have not received sufficient scrutiny within the consultation process despite their potential to represent one of the most significant sources of construction traffic. Public attention has naturally focused upon turbine deliveries and abnormal load movements. However, these activities are likely to represent only a small proportion of the total vehicle movements associated with the project.

The construction of access tracks, crane hardstandings, foundations, compounds and associated infrastructure will require substantial quantities of aggregate and construction materials. The Council supports the concerns raised within the Stronger Together submission regarding the adequacy of information currently available on aggregate sourcing, transport routes and traffic volumes.

At present, consultees have been provided with limited information regarding the total quantity of aggregate required, the location of source quarries, the distribution of haulage movements over the construction period or the peak daily traffic flows associated with material deliveries. These issues are fundamental to understanding the transport impacts of the development and should not remain unresolved at the point statutory consultation is being undertaken.

The Council is particularly concerned that aggregate haulage may ultimately have a greater day-to-day impact on Laneshaw Bridge than turbine deliveries themselves. Whilst abnormal loads attract considerable attention, it is the repeated movement of heavy goods vehicles over an extended period that is likely to define residents' experience of the construction phase.

The most significant local concern relates to School Lane and the Grade II Listed Laneshaw Bridge, commonly known as Royd Bridge. School Lane is a narrow residential route containing a designated heritage asset that lies at the heart of the village's identity. The Council considers that the road presents a foreseeable diversionary route for drivers seeking to avoid congestion on the A6068. This concern is not hypothetical. The proposed access arrangements, construction activity and potential traffic management

measures on the A6068 create circumstances in which drivers may seek alternative routes in order to avoid delays. The Council is concerned that the PEIR effectively assumes that such behaviour will not occur.

The Applicant has indicated that contractual restrictions, route controls and enforcement measures will prevent construction traffic from using unsuitable routes. Whilst the Council welcomes those commitments, it does not consider them sufficient to eliminate risk. Such measures may identify breaches after they occur, but they do not physically prevent vehicles from entering inappropriate routes. Environmental assessment should therefore consider the consequences of route non-compliance rather than simply assuming compliance.

This issue is particularly important because School Lane was never designed to accommodate sustained heavy goods vehicle movements associated with a major infrastructure project. The route serves residential properties, is used by pedestrians and cyclists and contains a listed structure of national significance.

Royd Bridge is more than a highway structure. It is a designated heritage asset and the historic feature from which the village derives its name. Its significance extends beyond its physical fabric and includes its setting, historic context and contribution to the identity of the community. The Council considers that the PEIR gives insufficient weight to this significance and has not adequately assessed the potential consequences of increased traffic pressure on the bridge and its surroundings.

In particular, the Council has been unable to identify detailed assessment of cumulative vibration impacts, structural risk, accidental damage risk, changes to the setting of the bridge or the effects of traffic diversion during periods of congestion. The absence of such analysis is difficult to reconcile with the acknowledged importance of the structure and the strategic role of the surrounding road network.

The Council therefore believes that a specific School Lane and Royd Bridge Impact Assessment should be undertaken prior to submission of any Development Consent Order application. Such an assessment should include structural appraisal, vibration assessment, heritage assessment, road safety analysis, route non-compliance scenarios and pedestrian safety considerations. It should also identify the measures that would be implemented to prevent inappropriate use of the route and protect the bridge throughout the construction period.

The Council is similarly concerned about the cumulative transport burden likely to be experienced by Laneshaw Bridge. The PEIR tends to assess transport impacts through metrics such as traffic flows, junction performance and network capacity. Whilst these are important considerations, they do not

fully capture the lived experience of a community situated on a principal construction corridor.

Residents are likely to experience the transport impacts of Calderdale Energy Park through increased vehicle movements, changes in traffic character, temporary traffic controls, construction activity, noise, vibration and disruption to daily travel patterns. These impacts will interact with one another and may persist over a prolonged period. In the Council's view, the cumulative consequences of these changes have not been adequately assessed. The Council therefore concludes that the Applicant has not yet demonstrated that the transport impacts of Calderdale Energy Park are fully understood or capable of being satisfactorily managed. Significant uncertainty remains regarding aggregate haulage, route compliance, motorway diversion scenarios, the protection of School Lane and Royd Bridge and the disproportionate burden likely to be experienced by Laneshaw Bridge as a gateway community.

Until these matters have been addressed through further assessment and consultation, the Council does not consider that the transport conclusions presented within the PEIR can be relied upon as a robust basis for decision-making.

## **SECTION 7 – HUMAN HEALTH AND COMMUNITY WELLBEING**

The Council is not satisfied that the PEIR adequately reflects the potential consequences of Calderdale Energy Park for community wellbeing and quality of life within Laneshaw Bridge.

Whilst the PEIR considers a range of environmental and transport effects, the Council is concerned that insufficient attention has been given to the way in which those effects may influence the health and wellbeing of residents over an extended construction period.

Health impacts associated with major infrastructure projects are not limited to direct physical effects. They may also arise through disruption to daily routines, changes in environmental quality, altered perceptions of safety, reduced accessibility, community severance and prolonged uncertainty regarding future conditions. The Council considers that these issues are particularly relevant to Laneshaw Bridge.

The village is likely to experience a sustained period of construction-related activity associated with traffic movements, aggregate haulage, abnormal load deliveries and associated works. Whilst each of these activities may be assessed separately within technical chapters of the PEIR, residents will experience them collectively as part of their everyday environment. The Council is concerned that the cumulative consequences of this disruption for community wellbeing have not been fully explored. Of particular

importance is the potential effect upon perceptions of safety and confidence in the local environment.

Changes in traffic conditions, increased heavy vehicle movements, temporary traffic management measures and alterations to established travel patterns may influence how residents choose to move through and interact with their community. Such effects can be especially significant for older residents, children, individuals with mobility limitations and those who may already feel vulnerable within the public realm.

The Council is also concerned about the potential for community severance. Laneshaw Bridge is a relatively small settlement with strong social connections and established patterns of movement. Where residents perceive routes to be less safe, less convenient or less attractive, there is a risk that participation in community life may be adversely affected. Such effects may not always be captured by conventional transport assessments but nevertheless have the potential to influence wellbeing and social cohesion.

The Council further considers that prolonged construction activity has the potential to affect residents' enjoyment of their homes and local environment.

Even where individual impacts are assessed as moderate or temporary, the cumulative effect of noise, vibration, traffic activity, disruption and environmental change over an extended period may influence overall quality of life. The Council is not satisfied that the PEIR adequately reflects this cumulative burden.

The village's historic character and identity are also important components of community wellbeing. Laneshaw Bridge is more than a transport corridor. It is a settled community with a distinct history, heritage and sense of place. The Council considers that any assessment of health and wellbeing should recognise that impacts upon community identity, local character and residents' relationship with their environment may have wider implications for wellbeing beyond those typically captured through quantitative assessment methodologies.

The Council is therefore concerned that the PEIR may underestimate the extent to which multiple construction-related effects could combine to influence health and wellbeing within the village.

This concern is reinforced by the absence of any dedicated assessment examining the cumulative effects of transport activity, environmental disturbance, changes to community function and impacts upon local character at community level.

The Council considers that a more integrated assessment of community wellbeing is required, particularly in relation to settlements expected to experience a disproportionate concentration of construction-related impacts.

Until such assessment has been undertaken, the Council is not satisfied that the human health implications of Calderdale Energy Park are fully understood and therefore maintains its objection to the proposal.

## **SECTION 8 – PEATLAND, HYDROLOGY, RESERVOIR CATCHMENTS AND THE WATER ENVIRONMENT**

Peatland, hydrology and the water environment represent some of the most environmentally sensitive aspects of Calderdale Energy Park and are among the areas where the Council remains least convinced that the Applicant has demonstrated an acceptable environmental outcome. The proposed development is located within an upland landscape characterised by extensive peat deposits, blanket bog habitats, complex drainage systems, reservoir catchments and watercourses that form part of a wider interconnected environmental network. The significance of these resources extends well beyond the development boundary and raises issues of national and regional importance relating to carbon storage, biodiversity, water quality and climate resilience.

The Council acknowledges that the Applicant has undertaken extensive survey work and assessment in relation to peatland, hydrology and hydrogeology. However, the existence of assessment does not in itself demonstrate that impacts can be avoided or satisfactorily mitigated. The key question is whether the evidence currently available provides sufficient confidence that the development can proceed without causing significant adverse effects upon highly sensitive environmental systems. At present, the Council is not satisfied that this has been demonstrated.

The Council supports many of the concerns raised within the Stronger Together response regarding peatland disturbance, hydrological impacts and the extent to which the PEIR relies upon future mitigation measures rather than clearly demonstrating that adverse effects can be avoided. Whilst the Council recognises that mitigation forms an important part of environmental assessment, the effectiveness of mitigation should not be assumed. In environmentally sensitive locations, the burden should remain on the Applicant to demonstrate that impacts have first been avoided wherever reasonably possible. This issue is particularly relevant in relation to peatland.

Peatland is not simply a construction constraint or a type of soil. It is a highly complex environmental resource that performs multiple functions simultaneously. Healthy peatland stores significant quantities of carbon, supports important habitats, regulates water movement, contributes to flood attenuation and plays an important role in maintaining water quality.

Disturbance of peat therefore has implications that extend far beyond the immediate footprint of the development.

The Council is concerned that the scale of infrastructure associated with Calderdale Energy Park creates an inherent risk of peat disturbance. Turbine foundations, crane hardstandings, access tracks, cable routes, construction compounds and associated engineering works all require interaction with the peat resource. Whilst individual elements may occupy relatively small areas, the cumulative footprint of the development is substantial. The Council is not yet convinced that the PEIR adequately demonstrates how the cumulative effects of these interventions will be avoided.

Particular concern arises from the extent to which the assessment relies upon future peat management and restoration measures. The Council accepts that peat restoration can provide significant environmental benefits when successfully implemented. However, restoration outcomes are not guaranteed. They depend upon a range of factors including hydrological conditions, weather patterns, vegetation establishment, long-term management and ongoing maintenance. There is therefore a fundamental difference between the certainty of peat disturbance and the uncertainty of future restoration success. In the Council's view, the PEIR does not sufficiently acknowledge this distinction.

The Council is also concerned about peat stability. The South Pennine uplands contain areas of deep peat and complex topography where ground conditions may be particularly sensitive to disturbance. The consequences of peat instability can be significant, extending beyond habitat loss to include sediment mobilisation, water quality impacts, damage to downstream ecosystems and, in extreme circumstances, peat movement events.

The Council notes that Stronger Together has raised concerns regarding peat stability assessment and the treatment of historic peat failures within the wider area. Whilst the Council is not in a position to independently verify those concerns, it considers that they raise legitimate questions regarding the assumptions underpinning the PEIR and warrant a detailed response from the Applicant.

The Council is particularly concerned that uncertainty regarding peat stability appears to be addressed largely through future management measures rather than through a clear demonstration that risks can be avoided in the first place. This concern extends to the wider hydrological assessment.

The development area forms part of a complex upland hydrological system characterised by interactions between peatland, surface water, groundwater, moorland drainage features and reservoir catchments. Construction activity has the potential to alter drainage pathways, modify

runoff characteristics, disturb sediment and affect water quality. These changes may not be confined to the development area and may have implications for downstream receptors. The Council is concerned that the PEIR may underestimate the long-term consequences of such changes.

Particularly significant is the relationship between the development and reservoir catchments. The upland landscapes affected by Calderdale Energy Park play an important role in regional water supply. Reservoirs within the wider area contribute to the provision of drinking water and form part of a strategic water resource. Consequently, impacts upon water quality should not be viewed solely as local environmental issues. They are matters of wider public interest.

The Council remains concerned that peat disturbance, sediment mobilisation and hydrological change may affect water quality within reservoir catchments. Potential consequences include increased suspended solids, changes in dissolved organic carbon concentrations and increased treatment requirements for water undertakers.

Whilst the PEIR identifies mitigation measures intended to address these risks, the Council is not convinced that sufficient evidence has been presented to demonstrate that significant effects can be ruled out with confidence. This issue becomes even more important when considered in the context of climate change.

Climate projections indicate an increasing likelihood of extreme rainfall events, prolonged periods of drought and greater variability in weather patterns over the operational life of the project. These changes have the potential to influence peat stability, erosion processes, drainage performance and water quality outcomes.

The Council has seen limited evidence that the PEIR fully explores the implications of future climate scenarios for the long-term performance of proposed mitigation measures. In particular, it is not clear that sufficient sensitivity testing has been undertaken to evaluate how peatland restoration and hydrological management measures would perform under more extreme climatic conditions. The Council therefore considers that greater emphasis should be placed upon climate resilience.

The Council is similarly concerned regarding carbon accounting. The Applicant places considerable emphasis upon the climate benefits associated with renewable energy generation and the contribution that Calderdale Energy Park could make towards national decarbonisation objectives. The Council accepts that renewable energy generation has the potential to deliver significant carbon savings over the operational life of a project. However, those benefits must be considered alongside the carbon implications of construction and environmental disturbance.

In peatland environments, carbon calculations are particularly sensitive to assumptions regarding peat condition, peat depth, disturbance levels and restoration success. Construction activity may result in carbon losses through excavation, drying, oxidation and habitat disturbance. The extent to which these losses are offset by future restoration measures remains uncertain.

The Council is concerned that carbon balance assessments can create an impression of precision that is not always justified by the underlying evidence. The assumptions underpinning such calculations should therefore be transparent, independently reviewable and subject to sensitivity testing.

More broadly, the Council is concerned by the recurring tendency within the PEIR to rely upon future plans and future management measures as a means of resolving present uncertainty. Whilst management plans are undoubtedly important, they should not be treated as a substitute for robust assessment. The role of environmental assessment is to demonstrate, as far as reasonably possible, that impacts can be understood and managed before consent is granted.

In the Council's view, significant uncertainty remains regarding peatland disturbance, peat stability, hydrological change, reservoir catchments, water quality and long-term environmental resilience.

The Council does not suggest that these issues necessarily render the development unacceptable. However, it is not satisfied that the Applicant has yet demonstrated that they can be satisfactorily addressed. Given the environmental sensitivity of the South Pennine uplands and the importance of the affected water environment, a precautionary approach is justified.

The Council therefore concludes that substantial further work is required before reliable conclusions can be reached regarding the effects of Calderdale Energy Park on peatland, hydrology and the water environment. Until that work has been completed, the Council maintains its objection to the proposal and considers that additional assessment and consultation are necessary before any Development Consent Order application is submitted.

## **SECTION 9 – ECOLOGY, ORNITHOLOGY AND INTERNATIONALLY PROTECTED SITES**

Ecology and ornithology represent some of the most significant environmental constraints affecting Calderdale Energy Park and, in the Council's view, remain among the least resolved elements of the proposal. The development is proposed within a landscape of exceptional ecological importance, containing internationally designated habitats and supporting species that are recognised as being of national and international conservation significance. The Council is therefore concerned that the current consultation is taking place before sufficient information has been

provided to demonstrate that ecological impacts can be satisfactorily avoided, mitigated or compensated.

The Council recognises that the Applicant has undertaken extensive ecological and ornithological survey work and that a considerable body of technical information has been assembled to support the PEIR. However, the scale of survey effort should not be confused with certainty of outcome. The critical issue is not whether data has been collected, but whether that data demonstrates that the proposal can proceed without causing unacceptable harm to protected habitats and species. At present, the Council is not satisfied that this has been demonstrated.

Particular concern arises from the relationship between Calderdale Energy Park and the South Pennine Moors Special Protection Area (SPA), South Pennine Moors Special Area of Conservation (SAC) and South Pennine Moors Site of Special Scientific Interest (SSSI). These designations reflect the ecological importance of the wider upland landscape and recognise habitats and species of international significance. The Council considers that the presence of these designations imposes a particularly high evidential burden upon the Applicant.

Where internationally protected sites may be affected, the issue is not whether significant effects are considered unlikely on balance. The issue is whether sufficient evidence exists to conclude, with a high degree of confidence, that adverse effects can be avoided or satisfactorily addressed. In the Council's view, important uncertainties remain.

The Council notes that the Applicant's own documentation identifies the need for ongoing ecological mitigation, habitat management and compensation measures. This is significant because it demonstrates that ecological impacts are not fully resolved. Throughout the PEIR there are references to developing mitigation strategies, habitat enhancement proposals and compensation measures that remain subject to further design and agreement. The Council is concerned that consultees are therefore being asked to comment on ecological effects before knowing the full details of the measures intended to address them.

This concern mirrors a wider issue identified throughout the consultation process. Environmental effects are often assessed on the basis that future mitigation will reduce impacts to acceptable levels. However, where mitigation remains under development, it becomes difficult to evaluate whether those conclusions are justified. The Council considers that this is particularly problematic in relation to ecology, where outcomes are inherently dependent upon long-term management, environmental conditions and ecological responses that cannot be guaranteed.

The Council supports many of the concerns raised by Stronger Together regarding ecological assessment, ornithological impacts, cumulative effects and the treatment of uncertainty within the PEIR. Whilst the Council does not necessarily adopt every technical conclusion contained within that submission, it considers that the issues raised are substantial and require detailed responses from the Applicant.

Of particular concern are questions relating to habitat loss, habitat fragmentation, species disturbance, displacement effects and collision risk. The Council notes that ecological impacts associated with wind energy developments are not confined to the direct loss of habitat beneath infrastructure. Species may be affected by changes in behaviour, altered movement patterns, disturbance during construction and operational interactions with turbines and associated infrastructure. These effects can extend beyond the immediate footprint of the development and may influence ecological networks across a much wider area. This issue is especially relevant in relation to ornithology.

The South Pennine uplands support a range of bird species that contribute to the importance of the SPA designation. The Council notes that extensive ornithological surveys have been undertaken and that the Applicant has invested considerable resources in understanding bird activity across the site. However, the Council is concerned that uncertainty remains regarding the extent to which bird populations may be affected by construction disturbance, displacement, habitat change and operational collision risk.

The Council is also concerned that the assessment tends to consider individual impact pathways separately when, in reality, species may be affected by multiple pressures simultaneously. For example, habitat disturbance, behavioural displacement and collision risk may interact in ways that are difficult to predict through individual assessment methodologies. Whilst each effect may appear manageable in isolation, the cumulative consequences may be more significant. This issue is compounded by the wider environmental context.

The South Pennine uplands are already subject to a range of pressures, including climate change, recreational activity, habitat degradation and historical land management impacts. The ecological effects of Calderdale Energy Park should therefore be considered not only in isolation but also within the context of existing and emerging pressures on the wider ecosystem. The Council remains unconvinced that cumulative ecological effects have been fully assessed.

A further concern relates to habitat compensation and biodiversity enhancement proposals. The Council welcomes genuine efforts to improve habitat quality and recognises the potential value of ecological restoration projects. However, biodiversity enhancement should not be treated as a

justification for avoidable environmental damage. The primary objective should always be to avoid impacts wherever reasonably possible. Compensation should be regarded as a measure of last resort rather than a substitute for avoidance.

The Council is concerned that the PEIR places considerable emphasis upon future habitat management and compensation measures whilst providing relatively limited detail regarding how those measures will be delivered, monitored and secured over the long term.

The effectiveness of ecological compensation depends upon a range of factors, including land management, hydrological conditions, ecological succession and long-term funding arrangements. Success cannot simply be assumed because a management plan exists.

The Council therefore believes that greater transparency is required regarding:

- compensation site selection;
- ecological objectives;
- management responsibilities;
- monitoring arrangements;
- contingency measures;
- funding mechanisms;
- long-term governance arrangements.

Without this information it is difficult to have confidence that ecological compensation will achieve the outcomes upon which the assessment relies.

The Council is similarly concerned regarding the interaction between ecology and other environmental topics. Ecological systems do not operate independently of hydrology, peatland condition, landscape character or climate resilience. Changes to drainage patterns may affect habitats. Peat disturbance may affect species composition. Alterations to vegetation management may influence ecological connectivity. The Council therefore considers that ecology should be viewed as part of a wider environmental system rather than as a standalone discipline. This reinforces the Council's broader concern regarding the cumulative assessment of impacts.

The Council also notes that the Applicant's ecological conclusions frequently depend upon assumptions regarding future monitoring and adaptive management. Whilst adaptive management can be an effective tool, it should not be used as a substitute for resolving key uncertainties before consent is granted. The existence of future monitoring does not in itself demonstrate that impacts are acceptable. Rather, it demonstrates that uncertainty remains. In the Council's view, the PEIR does not always make this distinction sufficiently clear.

Given the ecological importance of the South Pennine landscape and the proximity of internationally protected sites, the Council considers that a precautionary approach is justified. Where significant uncertainty remains regarding ecological effects, the burden should rest upon the Applicant to demonstrate that adverse impacts can be avoided, mitigated or compensated with a high degree of confidence. At present, the Council is not satisfied that this burden has been discharged.

The Council therefore concludes that significant uncertainty remains regarding ornithological impacts, habitat disturbance, species displacement, cumulative ecological effects, habitat compensation and long-term ecological management. Whilst substantial work has clearly been undertaken, important elements of the ecological case remain under development and have not yet been presented in a form that allows informed evaluation by consultees.

For these reasons, the Council considers that further ecological assessment, greater transparency regarding mitigation and compensation proposals and additional consultation are required before reliable conclusions can be reached regarding the ecological acceptability of Calderdale Energy Park. Until such information is available, the Council maintains its objection to the proposal in its current form.

## **SECTION 10 – LANDSCAPE, HERITAGE, TOURISM AND THE HISTORIC ENVIRONMENT**

Landscape and visual effects are among the most visible aspects of Calderdale Energy Park and have understandably attracted significant attention throughout the consultation process. However, the Council is concerned that discussion of landscape impacts has frequently been reduced to questions of visibility and visual change, when the issues raised by the proposal are considerably broader. The South Pennine uplands are not simply a collection of views. They represent a nationally important cultural landscape shaped by centuries of human activity, ecological processes, industrial development, agricultural management and settlement patterns. The significance of this landscape derives not only from what can be seen but from its historic, cultural, recreational and environmental value.

The Council considers that the PEIR tends to assess landscape, heritage, tourism and recreation as separate disciplines, whereas in reality these issues are closely interconnected. Changes to landscape character influence the way heritage assets are experienced. Changes to heritage settings influence visitor perceptions. Changes to recreational experience can affect tourism activity and local economic value. Assessing these matters in isolation risks underestimating the cumulative consequences of large-scale change across the wider landscape.

The Council recognises that National Policy Statement EN-3 acknowledges that wind energy development will often give rise to landscape and visual effects and that visibility alone is not necessarily sufficient reason to withhold consent. However, national policy also requires decision-makers to understand the significance of affected landscapes and to carefully consider the extent to which adverse effects can be avoided, reduced or mitigated. The Council is not persuaded that the PEIR has fully demonstrated this in relation to Calderdale Energy Park.

The South Pennine landscape possesses a distinctive character that is recognised locally, regionally and nationally. Open moorland, blanket bog, reservoirs, historic routeways, stone-built settlements and expansive skylines combine to create a landscape of considerable environmental and cultural value. These qualities are not accidental. They are the product of long-term interactions between people and place and contribute significantly to the identity of communities throughout the area, including Laneshaw Bridge.

The Council supports many of the concerns raised by Stronger Together regarding the scale of landscape change associated with the proposal. Whilst public debate has often focused upon turbine visibility, the Council considers that equal attention should be given to the wider infrastructure required to support the development. Access tracks, crane hardstandings, cable routes, compounds, substations and associated engineering works will all contribute to the transformation of the upland environment. The cumulative effect of these elements is important.

Landscape change is not experienced solely through views of turbines. It is experienced through the presence of infrastructure, changes to landform, alterations to vegetation patterns, construction activity and the gradual introduction of industrial features into landscapes that are currently perceived as predominantly rural and undeveloped. The Council is concerned that the PEIR places insufficient emphasis upon this broader process of landscape change.

A related issue is the way in which people experience the landscape. Landscape assessment necessarily relies upon representative viewpoints and defined study areas. Whilst this approach is established practice, it has limitations. Residents, visitors and recreational users do not experience landscapes through static viewpoints. They experience them dynamically through movement, repeated exposure and changing perspectives over time.

The Council considers that this is particularly relevant to the South Pennines, where walking, cycling, recreation and appreciation of the wider landscape form an important part of the area's character and appeal. The Council is concerned that the cumulative effect of repeated exposure to large-scale energy infrastructure across a wide upland landscape may be

greater than is suggested by individual viewpoint assessments. This issue has direct implications for recreation and tourism.

The South Pennines attract visitors for a variety of reasons including landscape quality, wildlife, heritage, outdoor recreation and cultural associations. The area forms part of a wider visitor destination encompassing Brontë Country, Pendle, the South Pennine Moors and the historic landscapes of Pennine Lancashire and West Yorkshire. Laneshaw Bridge occupies an important position within this wider landscape. The village serves as a gateway to the uplands and forms part of the network of settlements through which visitors access the surrounding countryside. The Council is concerned that the PEIR may underestimate the extent to which changes in landscape character could influence visitor experience.

This is not simply a question of visitor numbers. Tourism impacts are often difficult to quantify because they relate to perceptions of place, landscape quality and the character of recreational experiences. Whilst some visitors may view renewable energy infrastructure positively, others may regard extensive wind energy development as fundamentally altering the qualities that attract them to the area in the first place. The Council considers that these issues warrant greater attention than is currently evident within the PEIR.

The interaction between landscape and heritage is equally important. The historic environment of the South Pennines is inseparable from the landscape in which it sits. Many heritage assets derive significance not only from their physical form but also from their relationship with the surrounding landscape and the historical context that landscape provides. National heritage policy recognises that the setting of a heritage asset can make an important contribution to its significance and that changes to the surrounding environment may therefore affect heritage value even where there is no direct physical impact. This principle is particularly relevant to Laneshaw Bridge.

The parish contains a number of heritage assets and historic features that contribute to local identity and character, including Royd Bridge, Emmott Hall, Emmott Hall Cross, historic farmsteads, historic routeways and archaeological remains associated with the wider upland landscape. Many of these assets derive part of their significance from their relationship with a landscape that has remained comparatively free from large-scale industrial development. The Council is concerned that the PEIR may underestimate the cumulative effect of landscape change upon the setting and significance of these assets.

Particular concern arises in relation to Laneshaw Bridge, also known as Royd Bridge. As noted elsewhere in this representation, Royd Bridge is not simply a listed structure. It is the feature from which the village derives its name and occupies a unique place in the history and identity of the community. Its

significance extends beyond its architectural and historic value and includes its contribution to the character of the village and its relationship with the surrounding landscape. The Council considers that the heritage assessment gives insufficient weight to this wider significance.

The bridge should not be viewed solely as an individual heritage asset. It should also be understood as part of a broader historic landscape whose character may be influenced by changes associated with Calderdale Energy Park.

The Council is similarly concerned about the interaction between heritage and transport impacts. Changes in traffic character, noise, vibration and patterns of movement may alter the way heritage assets are experienced, particularly within small communities such as Laneshaw Bridge. The Council has seen limited evidence that these cumulative relationships have been adequately explored.

More broadly, the Council is concerned that the PEIR frequently reaches conclusions regarding significance by considering environmental topics in isolation. Landscape impacts are assessed separately from heritage impacts. Heritage impacts are assessed separately from tourism impacts. Tourism impacts are assessed separately from community wellbeing. Whilst this may be appropriate for technical reporting purposes, it risks obscuring the broader consequences of change. For residents and visitors, these distinctions do not exist.

People experience places as a whole. The character of the landscape, the presence of heritage assets, the quality of recreational opportunities and the identity of local communities are all interconnected. Changes to one aspect inevitably influence perceptions of the others. The Council therefore considers that the cumulative consequences of landscape, heritage and tourism impacts have been underestimated.

The Council accepts that the operational benefits of Calderdale Energy Park may carry significant weight in the planning balance. However, those benefits do not remove the need for a clear and robust understanding of what may be lost or altered as a consequence of the development.

In the Council's view, the South Pennine uplands constitute a landscape of exceptional environmental and cultural importance. The scale of change proposed by Calderdale Energy Park is therefore a matter of considerable significance and requires particularly careful assessment.

The Council concludes that the PEIR has not yet demonstrated that the landscape, heritage and tourism implications of the proposal are fully understood. Important questions remain regarding the cumulative effect of infrastructure across the upland landscape, the consequences for heritage

settings, the impact on recreational experience and the long-term implications for the character of the wider area.

For these reasons, the Council considers that further assessment is required before reliable conclusions can be reached regarding the landscape, heritage and tourism effects of Calderdale Energy Park and maintains its objection to the proposal in its current form.

## **SECTION 11 – COMMUNITY BENEFIT, HOST COMMUNITY STATUS AND FAIR DISTRIBUTION OF PROJECT BENEFITS**

The Council recognises that community benefit arrangements have become an established feature of many large-scale renewable energy developments and can play an important role in supporting communities affected by development.

The Council also recognises that community benefit is not intended to offset or compensate for adverse planning impacts. The acceptability of Calderdale Energy Park must be determined on its planning merits and not upon the existence of any future community benefit arrangements. However, where community benefit mechanisms are proposed, the Council considers that they should be structured in a manner that reflects the distribution of impacts arising from the development.

A central concern of this representation has been the distinction between proximity to development infrastructure and exposure to development impacts.

The Council is concerned that community benefit arrangements associated with major renewable energy projects are sometimes focused primarily upon communities located closest to operational infrastructure. Whilst proximity is clearly relevant, it does not necessarily provide a complete picture of how impacts are experienced.

The evidence presented throughout this representation indicates that certain communities may experience a disproportionate concentration of construction-related effects despite being located some distance from the principal turbine locations. The Council considers that this issue is particularly relevant to Laneshaw Bridge.

The village is expected to experience significant construction-related activity associated with project access arrangements and may therefore bear a substantial share of the disruption arising from the development. The Council considers that any future Host Community designation should take account of this reality and should not be determined solely by proximity to turbines or other operational infrastructure.

In the Council's view, Host Community status should be informed by the nature, duration and intensity of impacts experienced throughout both the construction and operational phases of the development.

The Council therefore believes that Laneshaw Bridge should be recognised as a Host Community for the purposes of any future community benefit arrangements associated with Calderdale Energy Park.

The Council is also concerned that limited information has been provided regarding the governance and allocation of any future community benefit funding.

At present, consultees have been provided with insufficient information to understand:

- how Host Communities will be identified;
- how funding allocations will be determined;
- what governance arrangements will apply;
- how impacted communities will be represented within decision-making structures; and
- how long-term accountability and transparency will be secured.

The Council considers that these matters should be clarified before submission of any Development Consent Order application.

Transparent governance arrangements are essential if community confidence is to be maintained and if future benefit arrangements are to command legitimacy amongst affected communities.

The Council further considers that communities experiencing significant project-related impacts should have meaningful representation within any governance structures responsible for allocating community benefit funding. This is particularly important where impacts are distributed unevenly between communities and where some settlements may experience substantial construction-related effects despite not being located adjacent to the principal development site.

The Council therefore requests that the Applicant publish further information regarding proposed community benefit arrangements, Host Community criteria, governance structures and funding allocation methodologies prior to submission of any Development Consent Order application.

Until such information is available, the Council is not satisfied that the implications of the proposed community benefit arrangements can be fully understood or evaluated.

## **SECTION 12 – CUMULATIVE EFFECTS**

The Council considers that the cumulative effects assessment represents one of the most significant shortcomings of the PEIR.

Whilst the PEIR contains 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 communities in practice. The assessment remains largely structured around individual environmental disciplines and gives insufficient attention to the combined consequences of those impacts at community level. This distinction is important.

Environmental Impact Assessment necessarily separates issues such as transport, noise, air quality, heritage, landscape, health and socio-economic effects into individual technical topics. However, communities do not experience those effects separately. They experience them collectively, simultaneously and over time.

The Council accepts that cumulative assessment has been undertaken within the PEIR. However, the issue is not whether cumulative assessment exists. The issue is whether it adequately reflects the lived experience of communities expected to experience multiple impacts throughout the construction and operational phases of the development. The Council does not consider that it does. This concern is particularly relevant to Laneshaw Bridge.

The evidence presented throughout this representation demonstrates that Laneshaw Bridge is likely to experience a combination of construction traffic, aggregate haulage, abnormal load movements, temporary traffic management measures, noise, vibration, changes in air quality, impacts upon heritage assets and disruption to normal patterns of movement and community activity. Whilst each of these matters is considered separately within the PEIR, the Council has been unable to identify any assessment that adequately evaluates their combined effect upon the community as a whole. The Council considers that this omission materially affects the conclusions of the assessment.

A recurring theme throughout the PEIR is the evaluation of impacts against individual thresholds, significance criteria and technical standards. Whilst this approach is consistent with established Environmental Impact Assessment methodology, it does not necessarily provide an accurate understanding of how impacts accumulate within specific communities.

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.

The Council is also concerned that the cumulative assessment gives limited attention to the geographical distribution of impacts. Environmental effects are frequently assessed across broad study areas and population groups, yet relatively little consideration is given to whether those effects are concentrated within particular communities. In the Council's view, this is a significant weakness.

The evidence available suggests that the impacts of Calderdale Energy Park will not be experienced equally across the study area. Certain communities are likely to experience a disproportionate concentration of construction-related effects due to their position within the proposed access strategy. Despite this, the PEIR contains no dedicated assessment of gateway community impacts and provides limited analysis of how cumulative effects are distributed between affected settlements.

The Council therefore considers that the cumulative assessment materially understates the likely burden that may be experienced by Laneshaw Bridge. A further concern relates to the cumulative effect of uncertainty itself. Throughout the PEIR, important elements of the proposal remain subject to ongoing refinement, further assessment or future mitigation measures. These include transport arrangements, aggregate haulage, ecological compensation, peatland restoration proposals, hydrological management measures and community benefit arrangements. Considered individually, each unresolved matter may appear manageable. Collectively, however, they create a significant degree of uncertainty regarding the overall effects of the proposal.

The Council considers that this cumulative uncertainty is itself a material consideration and further reduces confidence in the conclusions presented within the PEIR.

For these reasons, the Council concludes that the cumulative effects assessment does not provide a sufficiently robust basis upon which to understand the full consequences of Calderdale Energy Park for affected communities.

The Council believes that a dedicated Gateway Community Impact Assessment should be prepared prior to submission of any Development Consent Order application. Such an assessment should bring together transport, construction, heritage, environmental quality, health and community impacts into a single integrated assessment of those communities expected to experience a disproportionate share of project-related effects. Until such work has been undertaken, the Council is not satisfied that the cumulative consequences of Calderdale Energy Park are fully understood and therefore maintains its objection to the proposal.

### **SECTION 13 – INFORMATION GAPS, FURTHER ASSESSMENT REQUIREMENTS AND MATTERS REQUIRING CLARIFICATION PRIOR TO SUBMISSION OF ANY DEVELOPMENT CONSENT ORDER APPLICATION**

The Council's review of the PEIR has identified a number of significant information gaps that prevent informed conclusions from being reached regarding the environmental, transport and community implications of Calderdale Energy Park.

The Council recognises that a Preliminary Environmental Information Report is, by definition, a preliminary document and that further assessment is expected prior to submission of a Development Consent Order application. However, the extent of the outstanding matters identified throughout this representation indicates that important elements of the proposal remain insufficiently defined or assessed.

The Council therefore considers that further information, clarification and assessment are required in relation to the following matters:

- A comprehensive explanation of all corrections contained within the PEIR Errata Report, including confirmation of how those corrections have affected environmental assessments, modelling outputs and associated conclusions.
- Definitive information regarding aggregate sourcing, aggregate volumes, haulage routes, peak traffic movements and the distribution of construction traffic throughout the construction programme.
- Further assessment of route compliance, diversionary behaviour and motorway diversion scenarios affecting the A6068 corridor and surrounding local highway network.
- A dedicated School Lane and Royd Bridge Assessment addressing route non-compliance, heritage impacts, structural implications, vibration effects, road safety considerations and pedestrian safety.
- A dedicated Gateway Community Impact Assessment examining the cumulative effects of transport, construction activity, environmental disturbance, health, heritage and community impacts on settlements expected to experience a disproportionate concentration of project-related effects.
- Further information regarding peat excavation volumes, peat balance calculations, peat stability assessment methodologies, hydrological modelling assumptions and long-term monitoring arrangements.
- Detailed information regarding reservoir catchment protection measures, water quality monitoring proposals and long-term environmental management arrangements.
- Finalised ecological mitigation, habitat compensation and long-term ecological management proposals, including governance arrangements, monitoring requirements, contingency measures and funding commitments.
- Further information regarding cumulative landscape, heritage, recreation and tourism impacts, particularly in relation to the wider South Pennine landscape and the setting of designated heritage assets.

- Detailed proposals relating to community benefit arrangements, including governance structures, Host Community designation criteria, funding allocation methodologies and arrangements for community representation.

The Council does not suggest that all identified concerns are incapable of resolution. However, the Applicant has not yet demonstrated that sufficient information is available to enable reliable conclusions regarding the environmental, transport, heritage and community implications of the proposal.

Accordingly, the Council considers that the matters identified above should be addressed prior to submission of any Development Consent Order application and that affected communities should be afforded a further opportunity to comment once this information has been made available. Until these information gaps have been addressed, the Council remains of the view that the likely impacts of Calderdale Energy Park cannot be fully understood and that significant weight should be attached to this uncertainty when considering both the adequacy of the consultation process and the robustness of the evidence base supporting any future application.

#### **SECTION 14 – DEVELOPMENT CONSENT ORDER REQUIREMENTS, MITIGATION MEASURES AND COMMUNITY PROTECTIONS**

The Parish Council maintains its objection to Calderdale Energy Park and does not consider that the Applicant has yet demonstrated that the proposal is acceptable in environmental, transport, heritage or community terms. However, the Council also recognises that one of the purposes of statutory consultation is to identify measures that may reduce impacts and improve project design. It is therefore appropriate to identify the protections, mitigation measures and legally enforceable requirements that the Council believes would be necessary should the project proceed to submission and, ultimately, to examination.

The Council emphasises that the measures identified in this section should not be interpreted as indicating support for the proposal. Rather, they represent the minimum safeguards that would be required to address the concerns identified throughout this representation. In the Council's view, many of the mitigation measures currently described within the PEIR remain indicative and rely heavily upon future management plans, future approvals and future agreements. The Council considers that this approach creates unnecessary uncertainty and that key protections should instead be secured through enforceable provisions within any future Development Consent Order.

A recurring concern throughout the PEIR is the extent to which significant impacts are assessed on the assumption that future management plans will operate effectively. Whilst management plans are important, they do not provide the same level of certainty as clearly defined and enforceable requirements. The Council therefore believes that the Development Consent

Order should secure detailed obligations in relation to transport, heritage, peatland protection, hydrology, ecology, community engagement and community benefit.

The Council's most immediate concern relates to transport impacts and the protection of Laneshaw Bridge during the construction phase. Given the village's likely role as a principal gateway community, transport controls must extend beyond general traffic management measures and provide specific protection for sensitive routes and heritage assets.

In particular, the Council considers that School Lane should be formally designated as a prohibited route for all construction traffic associated with Calderdale Energy Park. This restriction should apply not only to abnormal loads and aggregate haulage vehicles but to all heavy goods vehicles directly associated with construction activities. The Council does not consider that contractual obligations alone are sufficient. Route restrictions should be incorporated into legally enforceable transport management arrangements and supported by active monitoring and enforcement mechanisms.

The Council is also of the view that specific protections are required for Laneshaw Bridge or Royd Bridge. As a Grade II Listed structure and the historic feature from which the village derives its name, the bridge should be treated as a sensitive receptor requiring dedicated protection throughout the construction period. Prior to commencement of development, the Applicant should be required to undertake a comprehensive structural survey, condition survey and vibration assessment. The findings should be independently reviewed and agreed with the relevant heritage and highway authorities.

Construction activities should then be subject to ongoing monitoring, including vibration monitoring, structural inspections and regular reporting. Where deterioration or damage is identified, the Applicant should be required to implement remedial measures immediately and at its own expense. The Council considers that protection of a designated heritage asset should not depend solely upon reactive intervention once damage has occurred.

The Council also believes that the Construction Traffic Management Plan must be significantly strengthened before any consent is granted. The Outline Construction Traffic Management Plan contains a number of positive commitments, including GPS monitoring and route compliance measures. However, the Council considers that these provisions should be mandatory rather than aspirational.

At a minimum, all heavy goods vehicles associated with the project should be subject to real-time GPS monitoring, route compliance reporting and independent auditing. Compliance reports should be published regularly and

made available to affected parish councils. A clear mechanism should also be established through which residents can report suspected route breaches, with defined investigation and enforcement procedures.

Transparency is essential. Communities expected to bear the consequences of construction traffic should be able to see whether commitments are being honoured in practice.

The Council also considers that formal governance arrangements should be established to oversee transport impacts throughout construction. A Transport Liaison Group should be created, including representatives of affected parish councils, highway authorities, the Applicant and principal contractors. The purpose of the group would be to review compliance data, consider complaints, monitor mitigation effectiveness and identify emerging issues before they become significant problems.

Beyond transport, the Council believes that substantial environmental protections are required in relation to peatland, hydrology and the water environment. No development should commence until detailed and fully developed versions of the Peat Management Plan, Peat Stability Risk Assessment, Construction Environmental Management Plan and Water Environment Management Plan have been approved by the relevant authorities. These documents should contain measurable objectives, monitoring requirements and clearly defined intervention thresholds. The Council is concerned that environmental management plans are often expressed in broad terms that make compliance difficult to assess. Wherever possible, commitments should be specific, measurable and independently verifiable.

Particular attention should be given to reservoir catchments and water quality. The Council considers that long-term monitoring should be secured through the Development Consent Order and should continue throughout construction and for a significant period thereafter. Monitoring should include sediment levels, dissolved organic carbon, water quality indicators and hydrological performance measures. Results should be publicly available to ensure transparency and public confidence.

Ecological mitigation and compensation measures require similar safeguards. The Council is concerned that important habitat management and compensation proposals remain under development and therefore cannot currently be assessed in detail. Should the project proceed, all ecological compensation measures should be legally secured for the duration of the project and supported by long-term funding arrangements. Success should be measured through ecological outcomes rather than simply through implementation of management activities.

The Council believes that habitat management plans should contain clearly defined targets, monitoring programmes and contingency measures to be implemented if restoration objectives are not achieved. The existence of a management plan should not automatically be regarded as evidence that ecological impacts have been satisfactorily addressed. The Council also considers that specific provisions should be included to address the needs of gateway communities.

Throughout this representation, the Council has argued that Laneshaw Bridge has been assessed primarily as part of the transport network rather than as a community likely to experience disproportionate impacts. The Council therefore believes that a dedicated Gateway Community Management Plan should be required before commencement of development.

Such a plan should address construction impacts, traffic management, community wellbeing, heritage protection, complaint handling and ongoing engagement with affected communities. The purpose of the plan should be to ensure that communities experiencing the greatest burden of development receive focused attention and tailored mitigation measures.

The Council further believes that a Community Liaison Group should be established prior to construction and should remain active throughout the construction period. Membership should include representatives from Laneshaw Bridge Parish Council and other affected communities. Meeting agendas, minutes and monitoring information should be publicly available. The Council considers that regular engagement should be regarded as a core component of mitigation rather than as a supplementary activity.

The Council also believes that community benefit arrangements require greater certainty. Whilst community benefit is not normally secured through planning obligations in the same way as environmental mitigation, the prominence given to community investment and legacy funding throughout the consultation process means that greater clarity is required before any application is submitted. At a minimum, the Applicant should publish clear criteria for Host Community designation, governance arrangements for any community fund, allocation methodologies and arrangements for local representation.

The Council's position remains that Host Community status should be determined by impact rather than proximity. If this principle is accepted, Laneshaw Bridge should be formally recognised as a Host Community due to the scale of transport and construction impacts likely to be experienced.

The Council also believes that consideration should be given to direct investment in community infrastructure, heritage protection, traffic safety improvements and environmental enhancement measures within affected

gateway communities. Such measures would provide a more meaningful legacy than reliance upon grant funding alone.

Finally, the Council considers that no Development Consent Order should permit commencement of development until all material environmental mitigation measures, compensation proposals and management plans have been finalised and approved. A recurring concern throughout the PEIR is the tendency to defer important decisions to post-consent stages. Whilst some flexibility is inevitable in projects of this scale, the Council does not consider that matters fundamental to understanding environmental acceptability should be deferred indefinitely.

The purpose of the consent process is to determine whether a project is acceptable. It should not simply determine whether further information may be prepared at a later date.

The Council therefore concludes that any future Development Consent Order would require a substantial package of enforceable protections, monitoring obligations and community safeguards. The measures outlined above represent the minimum level of protection that the Council believes would be necessary to address the concerns identified throughout this representation. Even with such protections in place, the Council's objection to the proposal remains. However, if the project proceeds to examination, these matters should form an important part of the discussion regarding the adequacy of mitigation and the protection of affected communities.

## **SECTION 15 – CONCLUSIONS, REQUEST FOR FURTHER CONSULTATION AND FORMAL OBJECTION**

Laneshaw Bridge Parish Council recognises the importance of renewable energy generation and the contribution that onshore wind development can make towards achieving national climate change, energy security and decarbonisation objectives.

The Council does not object to renewable energy development in principle, nor does it dispute the national need for additional renewable electricity generation identified within National Policy Statements EN-1 and EN-3. The issue before consultees is therefore not whether renewable energy is required. The issue is whether the Applicant has demonstrated that Calderdale Energy Park, in its current form, has been sufficiently developed, assessed and consulted upon to enable informed decision-making and to establish that its impacts can be satisfactorily avoided, mitigated or compensated.

Having reviewed the PEIR, supporting technical documentation, consultation materials, published corrections and the detailed evidence available during consultation, the Council's conclusion is that the Applicant has not yet demonstrated this.

Throughout this representation, the Council has identified significant concerns regarding the robustness of the evidence base, the adequacy of consultation, the treatment of uncertainty within the assessment process and the extent to which important environmental, transport and community impacts remain unresolved.

Particular concern arises from the reliance placed upon future mitigation measures, future management plans and future approvals to address matters that are fundamental to understanding the likely consequences of the proposal. The Council considers that consultees should be able to scrutinise the measures upon which conclusions of acceptability depend, rather than being asked to place reliance upon measures that remain under development.

The Council is also not satisfied that the PEIR adequately reflects the unequal distribution of impacts across affected communities.

A recurring theme throughout this representation has been the position of Laneshaw Bridge as a gateway community likely to experience a disproportionate concentration of construction-related impacts. The Council considers that the cumulative implications of transport activity, aggregate haulage, abnormal load movements, temporary traffic management measures, environmental disturbance and community disruption have not been adequately assessed at community level and that the burden likely to be experienced by Laneshaw Bridge has been materially understated. The Council further concludes that substantial uncertainty remains regarding transport impacts, route compliance, aggregate haulage, cumulative effects, peatland disturbance, hydrology, ecological mitigation, environmental management arrangements and community benefit proposals. Taken together, these matters create a degree of uncertainty that is inconsistent with informed decision-making and significantly reduces confidence in the conclusions presented within the PEIR.


The burden rests with the Applicant to demonstrate that impacts can be satisfactorily addressed. In the Council's view, that burden has not yet been discharged.

Accordingly, Laneshaw Bridge Parish Council formally objects to Calderdale Energy Park in its current form.

The Council requests that the Applicant undertake further assessment and provide additional information in relation to the matters identified throughout this representation, including gateway community impacts, cumulative effects, transport, peatland, hydrology, ecological mitigation and community benefit arrangements. The Council also requests that affected communities be afforded a further opportunity to comment once these matters have

been resolved and the proposal has reached a sufficiently mature stage of development.

Until such time, the Council maintains its objection and reserves the right to make further representations in response to any additional information, revised assessments or future Development Consent Order application submitted in relation to Calderdale Energy Park.

A handwritten signature in black ink, appearing to read 'Paul White', written over a faint horizontal line.

**Councillor Paul White**  
**Submitted on behalf of Laneshaw Bridge Parish Council**  
**Chairman, Laneshaw Bridge Parish Council**

**Response to the Calderdale Energy Park Statutory Consultation under the  
Planning Act 2008**