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House of Commons
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Freepost
CALDERDALE ENERGY PARK

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BY EMAIL & POST
Recorded Delivery

6th June 2026

OBJECTION TO THE DEVELOPMENT OF CALDERDALE ENERGY PARK
FORMAL RESPONSE TO THE STATUTORY CONSULTATION

I write regarding the proposed development of the **Calderdale Energy Park** and to respond formally to the statutory consultation.

This letter sets out the detailed reasoning of **my strong opposition** to the scheme and outlines why I believe the **scheme should not be progressed** and **should be withdrawn** from further consideration.

Please note that this correspondence has been submitted via email and via post using recorded delivery to the statutory consultation process.

Overview

Ever since the Calderdale Energy Park proposals were first put forward in 2023, I have been inundated, quite rightly, with correspondence from my constituents and local campaign groups who have severe concerns regarding the proposals. Many issues and concerns regarding the scheme have been raised with me and this letter sets out why I believe the Calderdale Energy Park will be so damaging to our heritage landscape, our environment, our ecology, our precious peatland, and many other considerations.

To make it clear, I am not against the development of wind farms or renewable technology. But I am strongly opposed to wind turbines being installed and constructed on protected peatland and on world renowned heritage landscapes such as the Walshaw Moor which sits in the heart of the Brontë country.

I urge you, as the developer of the scheme to consider the points I am raising and to conclude that the scheme should be withdrawn.

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Statutory Consultation Timings

Before I outline my concerns in relation to the proposed development, you will know that I am extremely disappointed that the Calderdale Energy Park has chosen to run the statutory consultation period during a local election period. A nine-week period commencing on Wednesday 8th April, up to Wednesday 10th June fell directly within the pre-election period for local elections, known as "purdah" and well into the early stages of newly formed council administrations, beyond the local election date of Thursday 7th May. This is wholly unsatisfactory, and I remain deeply frustrated that neither you, as the applicant, or the UK government has sought to extend the statutory consultation period, despite direct requests from myself being made.

Both Bradford Council and Calderdale Council explicitly requested to the Calderdale Energy Park that the statutory consultation period should have been delayed until after the local elections to align with their responsibilities during purdah and ensure that newly elected councillors and any new administration are able to properly engage with the process.

I am deeply disappointed that you chose to disregard both requests, and I would appreciate an explanation as to why you felt it was appropriate to do so.

I now proceed to raise the substantive points as to why I believe the Calderdale Energy Park should not proceed.

1. Impact on Biodiversity and Ornithology

UK peatlands are of international significance, supporting rare and protected species. This is reflective in the extensive designation of peatland sites as Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Sites of Special Scientific Interest (SSSI), which provide legal protection of their ecological features. Walshaw Moor, the site of the proposed development, is part of the South Pennines SSSI, SPA and SAC, designated for its irreplaceable blanket bog habitat and the rare and fascinating species that call this rich and ancient peatland home.

Walshaw Moor is at the centre of the South Pennines Moors SPA Phase 2, designated because of its large numbers of protected breeding birds such as Curlew, Lapwing, and Skylark, and for important numbers of Golden Plover and Merlin.

Vital habitat on the moorland will be damaged beyond repair to construct the Calderdale Energy Park, meaning the whole SPA will be fragmented. Internationally significant breeding assemblages of rare birds will be dispersed, as large areas of their habitat is destroyed forcing them to move elsewhere to avoid disturbance by construction work and the turbines themselves. The irreplaceable blanket bog habitat which sustains these breeding birds will be irreparably damaged by the infrastructure needed to create the wind farm, as restoration of the blanket bog can only take place at a few millimetres a decade.

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The ground-nesting birds which return to the moor each spring include critically endangered species such as Curlews, Lapwings and Golden Plovers, as well as Redshanks, Skylarks and Snipe. Despite this, Curlews are thriving on Walshaw Moor even though they are becoming extinct elsewhere. In Wales the decline is now so steep (6% per year) that it's anticipated the Curlew will cease to be a breeding bird in 2033. Curlews live for thirty years and return annually to the place they fledged. The pairs lay four eggs each season and, in many places, fail to raise a single chick to fledging due to habitat loss and risk of predation by ground and aerial predators. This threat is higher when Curlew numbers are fewer which makes their success on Walshaw Moor so important, and the need to protect the moor from development even more crucial.

Another example is that the of the Lapwing. Lapwings have declined by 55% in England since the 1960s though on Walshaw Moor, their numbers remain buoyant.

These birds will be wiped out if the wind farm development goes ahead, along with rare birds of prey such as Merlin and Short-eared Owls. Whole ecosystems will disappear as the landscape will inevitably lose its ground nesting birds and the associated habitats.

Walshaw Moor is part of a SPA. It is noted that there is no higher designation than a SPA and there are only 84 such areas in England. Other comparable sites include the Farne Islands, Flamborough Head and The Wash, adjoining the Lincolnshire coast. It is therefore deeply disturbing that such a development is being considered on a SPA.

Since 2017, the Walshaw Moor Estate Catchment Restoration 2017-2042 Plan (MRP002) has been in place. This plan is an agreement between Natural England and the Walshaw Moor Estate. The plan contains a series of integrated measures that work together to restore, protect and enhance the blanket bog habitat over the lifetime of the plan. The intent of the plan is to improve the important blanket bog habitat by management interventions such as grip (drain) blocking, Molinia (purple moor grass) control, sphagnum moss inoculation and gulley restoration. One of the drivers of this plan is to enhance the biodiversity and ornithology.

The wind farm development will severely negatively impact the ability of the outcomes included within the Catchment Restoration Plan to be fulfilled.

2. Impact on Hydrology and Peat

It is universally known that Walshaw Moor is made up of irreplaceable blanket bog and as such, the moorland is designated as a SAC, mainly due to its peatland bog mosaic.

Peatlands store more carbon that all the rest of the world's vegetation put together. But an active peatland bog, in a healthy state, only forms new peat at about 1 mm per year, taking CO_2 out of the atmosphere and locking away the carbon.

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The peat within the Calderdale Energy Park boundary is up to six metres deep in places, with an average depth of more than one metre. Once peat is disturbed by mechanical means for development purposes, it is potentially destroyed forever.

The Calderdale Energy Park construction poses many risks to the peatland, and thus its carbon storage potential. The direct digging for turbine foundations, crane hardstanding, access tracks, cabling routes, and compounds will all destroy the peat. The drying of peat around the infrastructure is also a huge concern, because of the many ditches and channels which will need to be dug in the peat to act as drains. This will result in the disturbed peat being dried out. The cabling itself will also emit heat, which will dry the surrounding peat, thus significantly reducing its carbon storage capacity and releasing carbon into the atmosphere.

To build the Calderdale Energy Park and then maintain it for decades to come, maintenance and service roads will need to be built across the peat. The construction of roads and tracks will have significant adverse effects on peatland hydrology. So-called 'floating roads' are proposed to be constructed as part of this development, often used over deep peat to reduce subsidence and prevent adverse impacts on the peatland.

Evidence suggests that floating roads can still dam the flow of water across and through a peat mass, by blocking surface flow and compressing underlying peat. This can significantly alter the habitat drainage regimes, and in the longer term negatively impact the mosaic hydrology of the peatland.

There is the same amount of solids in peat as there is in a jellyfish, which is why long-established estate tracks typically avoid deep peat. The tracks that will need to be built across the peat for the construction and maintenance of the Calderdale Energy Park will likely have long-term impacts to the water regime of the peat. For this development to go ahead, the peat will have to be drained, meaning the peat will inevitably shrink and therefore crack, exposing it to risk of movement. The cracking will create further avenues for rainwater to enter the peat and reach the interface between the peat and the mineral soil beneath, which will risk triggering bog slides and increasing flood risk in the settlements of Hebden Bridge and other Calder Valley towns.

As well as storing carbon, the blanket bogs on Walshaw Moor play another vital environmental role as peat acts like a giant sponge, storing vast quantities of water. Damaging the peatland on such a massive scale during the construction of the wind farm would significantly reduce its ability to hold water. Surfacing large areas of the moor with concrete and crushed stone will further reduce its permeability and inevitably increase water runoff.

Walshaw Moor is one of the main catchment areas for the flood-prone Calder Valley. Alcomden Water carries water from Walshaw Dean to Hardcastle Crags, merging with Graining Water in Blake Dean to form Hebden Water, then merging with Crimsworth Dean Beck at Midgehole before flowing down to join the River Calder in Hebden Bridge.

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If the blanket peat bogs on Walshaw Moor can no longer hold the same volume of water, the sudden increases in river levels during heavy rainfall will be accentuated, which could lead to disastrous flooding downstream. So, the proposed Calderdale Wind Farm would not only reap destruction on the precious habitats and wildlife on Walshaw Moor, but it could also potentially have a catastrophic impact on Hebden Bridge and Mytholmroyd, as well as communities downstream in the Calder Valley, including Luddendenfoot and Sowerby Bridge. Knowing the devastating impact that flooding has had in Calderdale in recent years and given the millions of pounds spent on reparation work and flood prevention schemes, it would be an act of extraordinary ill-judgement to proceed with a development that places the residents of the Calder Valley in jeopardy.

Peatlands also play a major role in improving water quality, with 72% of reservoirs being fed by peaty catchments. Disruption to peat risks severely undermining the quality of this water. I reference the example of what happened at Derrybrien in Galway in 2004, during the construction of Ireland's biggest windfarm. During construction, because the water regime was disrupted, two kilometres of hillside slid down the hill and travelled 20 kilometres along the local river system. It narrowly missed the village of Derrybrien and the Irish government were taken to the European Court of Justice where they were found guilty of permitting this development based on a totally inadequate Environmental Impact Assessment. The Irish Government was told it must resolve the issue but continually failed. It was found guilty again recently and fined very large sums of money by the European Commission. It has since decided to remove the wind farm. It is clear in my mind that the Calderdale Energy Park proposal will increase the risk of flooding as the development will negativity impact the peat's own hydrology.

3. Carbon and Climate Change

My third concern is the detrimental impact on carbon emissions on Climate Change if the Calderdale Energy Park is allowed to proceed. This follows on from the points made in section two.

The South Pennine Moors have been laying down peat since the Bronze Age. It has been absorbing the carbon emissions of the mills of our industrial past, of our transport, food and everyday modern life. According to Moors for the Future, 'English peatlands are a significant carbon store, holding an estimated 584 million tonnes of carbon, equivalent to 2.14 billion tonnes of CO_2 or approximately five years of England's total annual carbon emissions.'

When upland peatlands are disturbed, carbon is released, but as long as it remains waterlogged, peat won't decompose. However, as soon as you start drying it out, draining it, disturbing it, allowing air to get into that organic matter, it will decompose. When the water table is lowered, the compressed organic matter in the peat is disturbed, allowing air to penetrate deeper into the peat and causing it to dry out and decay. This process turns long submerged carbon into carbon dioxide, contributing to the release of centuries worth of stored carbon into the atmosphere.

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Given the construction of the wind farm will result in peat being disturbed, CO_2 will be released into the atmosphere and the future carbon storage potential of the disturbed peat will be significantly reduced, if not destroyed.

From conversations with representatives of the Calderdale Energy Park at the consultation session held in Oxenhope, I was referred to the Carbon Calculator and told I should seek reassurance from that. However, I note that in Scotland, whilst developers are guided to use a Carbon Calculator to estimate the emissions from building wind turbines on peatland, a 2024 report from Scottish Government's independent climate research body found that the Carbon Calculator needed significant improvement. There is also no requirement to use this Carbon Calculator in England, and it has no equivalent of its own but even if it followed the same rules as the current Scottish one, it would be extremely outdated and not a true reflection of the current grid make up.

I am deeply concerned that no formal or accurate carbon loss or gain calculation has been done in relation to the Calderdale Energy Park.

It is my firm view that the massive environmental damage inflicted on the landscape, combined with the indirect collateral damage caused by the development, far outweigh any purported benefits, especially given that the wind farm's lifespan may be as short as 25 years.

World leading peat experts have agreed that one of the strongest arguments against any wind farm development on peatland, let alone one with the protections of Walshaw Moor is that is it very difficult to pay back the carbon dioxide that is released by disturbing the peat.

4. Transport and Access

This development will have severe implications on our highway's infrastructure, give the huge scale of the construction.

Constructing 34 gigantic turbines on 9 square miles of blanket peat bog will require extensive excavation and literally thousands of lorries transporting concrete and crushed stone. Transporting the huge components for the 200-metre-high turbines and massive quantities of construction materials on the notoriously steep, narrow, windy roads in Calderdale and the neighbouring Bradford District will be hugely disruptive to the local community and extremely dangerous.

In addition to the concrete foundations, each turbine will require crane pads, 6-metre-wide access tracks and cable runs potentially up to 40 metres wide. New site access roads will need to be constructed and huge 'borrow pits' are also proposed. Walshaw Moor SSSI would be literally torn to pieces during the lengthy construction process. The short-term and long-term disturbance to the peat will also result in catastrophic environmental impacts, including flooding and peat landslides.

This windfarm will require a vast amount of aggregate gravel. Given that the geology of West Yorkshire is simply not suitable for providing the quality needed, this means that the aggregate will have to be imported into the construction site from elsewhere.

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The importation of aggregate for windfarm development is neither the norm or typical. Most wind farm developments in Scotland and Wales are constructed from stone quarried in onsite borrow pits. Given the poor quality of the stone locally, any stone quarried inside the Calderdale Energy Park red line boundary can only be used as bulk fill. This bulk fill is available from all reputable West Yorkshire stone quarries as a waste product from the extraction and cutting of high-quality building stone blocks, for which gritstone has always been highly suitable as aggregate.

Effectively this means that when developing windfarms in Scotland and Wales, enough stone is only needed to build the road to the first borrow pit and the rest of the windfarm can be built from internal resources. This cannot be done on Walshaw Moor because the stone is not strong enough for the road surfaces and concrete.

Calderdale Wind Farm would need to transport around 900,000 tonnes of aggregate to provide the base for its 23 acres of infrastructure. This will cause huge inconvenience to all neighbouring residents, local businesses and road users.

Further, limestone from the North Yorkshire Dales cannot be used as a roadstone on Walshaw Moor because the reaction between limestone and the strongly acidic bog will release bicarbonate, which is poisonous to peat-forming sphagnum.

It was announced on 3 February 2026 at the Hebden Bridge meeting of the Hilltop Parishes that all the stone will go via Lancashire Moor Road and onto site via the Crow Hill Access. This will cause huge inconvenience and disturbance. I am concerned that other access routes will also be used.

I also have deep concerns regarding the transportation of the main component parts. Delivery convoys will be needed, with each turbine likely being made up of three blades, three sections of pylon, and two sections of the transformer. All these sections are either extremely heavy or awkward in shape/length. The only way up to the proposed site is through Colne, and then through Laneshaw Bridge, for which a special route will have to be built. The access track for a wind farm must be able to carry 200 turbines and so will need to be twice the width and a much stronger track than what is currently there.

Further, the pylons will not be able to be transported through by day, because it will mean the complete shutdown of the road system from Boundary Mill to the end of Colne, while they get the convoy through. It is not just a case of getting the convoys through when the roads are quiet, but there will be other extenuating circumstances like police presence and wind speed to be considered.

In 2024 developers Energiekontor experienced a disastrous delivery of the infrastructure for its Pines Burn project through the Scottish town of Hawick. They could only be transported when the wind was less than 10 (m/s) and thus police presence had to be co-ordinated with the wind and it took six months to deliver 7 turbines that were 60 metres high. Proposals for the Calderdale Windfarm will see 34 wind turbines that are 80 metres high needing to be transported, so I foresee that the disruption will be far worse.

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5. Impact Heritage, Tourism and Landscape

Walshaw Moor lies in the heart of a landscape with internationally renowned literary associations, most famously the Brontë sisters - Charlotte, Emily and Anne Brontë - who evoked the stark beauty of this moorland landscape so powerfully in their work. Their walks over the moors from their home in Haworth inspired some of the greatest novels and poetry in the English language, including Emily Brontë's *Wuthering Heights,* Charlotte Brontë's *Jane Eyre* and Anne Brontë's *The Tenant of Wildfell Hall.*

The Brontë Society, the charity which looks after the Brontë Parsonage Museum in Haworth, is against the proposed wind farm at Walshaw Moor, the site of which encompasses Top Withens, believed to be the inspiration for the setting of Wuthering Heights. Each of the 70,000 visitors who visited in the last year understands the inseparable connection between the moors and the Brontes. The natural environment threatened by Calderdale Energy Park allows the literary tourist to physically travel through the landscapes of the Brontës' imaginations and the worlds of their novels and poetry.

The Brontë sisters are not the only world-famous literacy figures associated with the Walshaw Moor and surrounding area. Mytholmroyd-born Poet Laureate Ted Hughes (1930-1998) is another towering literary figure whose work is celebrated around the globe. Hughes's writing was deeply inspired by the landscape and wildlife of the Calder Valley, and he retained close connections with the area throughout his life. His poetry is studied in schools and universities throughout the country, and his legacy is celebrated through the Elmet Trust, the Ted Hughes Network, the Ted Hughes Society and the Arvon Foundation at Lumb Bank near Heptonstall. Hughes wrote powerfully about the area in his book *Remains of Elmet* (1979), illustrated with iconic photographs by Fay Godwin. Hardcastle Crags, Crimsworth Dean, Widdop and Walshaw Moor all feature prominently in this work.

If the wind farm goes ahead, it is not only Calderdale's precious landscape that will be destroyed but the literary heritage of one of the greatest poets of the 20th century. The Ted Hughes Estate have also voiced strong opposition to the wind farm.

The Upper Calder Valley is also the final resting place of Sylvia Plath (1932-1963), one of the most celebrated and influential poets of the post-war era, whose grave in Heptonstall is a place of pilgrimage for Plath fans from around the world. As her biographer Heather Clark has pointed out: 'Sylvia Plath first visited the area shortly after her marriage to Ted Hughes and responded to the landscape in her own unique way as they walked in Hardcastle Crags and over Walshaw Moor to Top Withens. She wrote several poems about the moors, which she loved. The literary legacies of the Brontës, Ted Hughes and Sylvia Plath are all indelibly intertwined - with each other and with this landscape - and they will all be irrevocably damaged if this landscape is desecrated.'

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In addition to the literary heritage, local walkers who appreciate the landscape and wildlife of Calderdale and Brontë Country have resoundingly rejected the proposed Wind Farm on Walshaw Moor above Hebden Bridge. In a Walkers' Survey carried out during May and June 2024, 92% of respondents said they objected to the development, citing the industrialisation of the unspoilt rural landscape (93%) and the destruction of birds, wildlife and moorland habitats (84%) as their primary concerns. The Pennine Way, which runs right through the centre of Walshaw Dean to Top Withens, was singled out as one of the most popular local footpaths, with 91% of walkers having used it over the last year which loops round the Calderdale Valley and has many views towards Walshaw Moor along its 50-mile length.

As well as dominating the Walshaw Moor Estate in its entirety, Calderdale Energy Park would tower over the neighbouring National Trust estate of Hardcastle Crags, Crimsworth Dean and Widdop Reservoir. Extending from Stanbury Moor and Haworth Moor in the north to Boulsworth Hill in Lancashire, the wind farm would intrude on cherished and culturally important views throughout Calderdale and Brontë Country, including Stoodley Pike, Widdop Gate, Blake Dean and 'the Crags' at Hardcastle Crags, High Brown Knoll, Cock Hill and Haworth Old Road above Crimsworth Dean, Heptonstall Moor, Widdop Reservoir, Penistone Hill. It would also severely compromise and undermine the integrity of the newly created Bradford Pennine Gateway National Nature Reserve (part of which lies near Walshaw Moor), an internationally lauded conservation project championed by Natural England in 2025 under the patronage of King Charles.

The Brontë Country is also subject to a live application for a UNESCO World Heritage Site status and Top Withens is subject to a listed status application.

The Calderdale Energy Park development will be devastating for our unique heritage landscape, and it will result in visitors being put off from coming and visiting. This will result in financial loss to all those local organisations who benefit.

Conclusion

In this letter, I have laid out reasons for my formal opposition to the Calderdale Energy Park proposal, which is based on the opinions of word leading peat scientists, literary patrons, local campaign groups and experts in biodiversity. I have sought to explain in detail why this development would be so detrimental and damaging to our heritage landscape, our environment, our ecology, our precious peatland, and many other considerations such as transport and highways.

The Calderdale Energy Park will have such detrimental and irreversible implications for those whose lives are dependent on the landscape being healthy and intact.

The visual character of Calderdale's and the Worth Valley's upland landscape is defined by the smooth contours of the rolling Pennine Hills. Turbines are an intrusion on the skyline, and they will radically alter the perception of our world-renowned heritage landscape.

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Walshaw Moor is one of the last unspoilt upland areas in the Upper Calder Valley. The South Pennines Wind Energy Study produced by Julie Martin Associates highlights the dangers of allowing this to happen. If this huge development is permitted, wind turbines will completely dominate the horizons and destroy the distinctive character of the Pennine Hills. Developments of this kind on Walshaw Moor SSSI are specifically ruled out in the Calderdale Local Plan, which includes a map clearly showing that turbines should not be in parts of the Borough classified as SPA and/or SSSI.

As the Yorkshire Wildlife Trust have pointed out, excavating the peatland on Walshaw Moor would increase carbon dioxide emissions, thereby exacerbate climate change and negate any benefit of renewable energy generation.

According to the RSPB, 'a wind farm on Walshaw Moor is highly inappropriate, given the sensitivity of this location, with important peatland habitat, significant wildlife interest and protected wildlife sites.'

World leading peat scientist Professor Richard Professor Lindsay has said that if the Calderdale Windfarm Proposals were to go ahead it would be a leap of faith, but a leap of faith that from "what we do know is steadily eroding our natural capital."

This development does not make sense. It seems to be pursued in the name of net zero but makes zero sense.

It harms our environment, our ecology, our wildlife and bird population.

It harms our precious peatland, our bogs and its carbon storage potential.

It harms our heritage, our landscape, and our communities and neighbours.

The development must not proceed, and I urge you to withdraw the application.

I would be grateful if you could confirm receipt of this correspondence and I look forward to receiving your response, so it can be shared with my constituents.

Yours faithfully,

Robbie Moore MP
Member of Parliament for Keighley and Ilkley

cc: Secretary of State for Energy Security and Net Zero, Rt. Hon. Ed Miliband MP