

09/06/2026

Calderdale Wind Farm Limited
c/o Cavendish Consulting Limited

By email: info@calderdaleenergypark.co.uk

Dear Calderdale Energy Park consultation team,

CPRE West Yorkshire response to the Calderdale Energy Park statutory consultation

CPRE West Yorkshire has considered the proposals for the Calderdale Energy Park and **objects to the principle of Calderdale Energy Park in its proposed location at Walshaw Moor.**

Our review is structured around six points

1. Location
2. Preliminary Environmental Information Report
3. Designated sites, habitats and birds
4. Blanket bog, deep peat, carbon, hydrology, flood risk and fire risk
5. Landscape, cultural heritage and Brontë Country
6. Construction traffic, aggregate importation and affected communities

We have provided a conclusion together with requested actions.

Yours sincerely,

CPRE West Yorkshire

Sent via email from planning@cprewestyorkshire.org.uk

CPRE West Yorkshire response to the Calderdale Energy Park statutory consultation

Introduction

CPRE West Yorkshire supports urgent action to address climate change and recognises the important role that renewable energy, including onshore wind, can play in the transition to a low-carbon energy system.

However, renewable energy must be delivered in the right places and in ways that protect and restore nature, soils, water, landscape character, cultural heritage and local communities.

CPRE West Yorkshire objects to the principle of Calderdale Energy Park at Walshaw Moor

This is not an objection to renewable energy. It is an objection to the placement of nationally significant industrial energy infrastructure on an internationally and nationally designated upland moorland landscape containing irreplaceable blanket bog, deep peat, sensitive hydrology, protected species, and a South Pennines cultural landscape of exceptional public value.

We have included references to the National Planning Policy Framework (NPPF). Whilst we recognise that paragraph 5 states ‘the Framework does not contain specific policies for nationally significant infrastructure projects’, we cite NPPF clauses as material considerations that the applicant’s evidence must address.

Because this is expected to proceed as a nationally significant infrastructure project, CPRE West Yorkshire considers the relevant National Policy Statements to be central. EN-3 creates a clear sequential and evidential test for onshore wind on peatland: alternative locations should be ruled out first; deep peat should be avoided through design; and any infrastructure proposed on peatland must be supported by detailed peat survey evidence and a specific justification for why it needs to be sited there.

On the information available, CPRE West Yorkshire does not consider this to have been demonstrated.

1. The proposal is in the wrong location

The proposed development is in one of the most sensitive upland landscapes in West Yorkshire. Walshaw Moor forms part of the South Pennine moorland landscape and is associated with statutory ecological designations, protected habitats and protected bird species. The scale of the proposed development — including turbines, access tracks, crane pads, borrow pits, underground cabling, compounds and construction traffic — would fundamentally alter the character, function and integrity of this landscape.

National policy supports renewable energy, but it does not require or justify the avoidable loss or deterioration of irreplaceable habitats or the siting of major infrastructure in locations where the environmental harm is likely to be severe, long-term or irreversible.

CPRE West Yorkshire does not consider that the applicant has demonstrated that other, less sensitive locations have been properly assessed and ruled out before proposing a major onshore wind scheme on peatland and within a highly sensitive designated moorland environment.

2. The PEIR does not provide an adequate basis for informed consultation

The Preliminary Environmental Information Report (PEIR) appears insufficient to allow communities, statutory consultees and interested organisations to understand the full likely effects of the proposal. The consultation material itself describes the PEIR as preliminary, yet the matters requiring assessment are fundamental to whether the site is suitable at all.

CPRE West Yorkshire is particularly concerned that the PEIR does not appear to provide a sufficiently robust worst-case assessment of impacts on peat, hydrology, protected habitats, bird populations, carbon balance, fire risk, landscape and cultural setting, or construction traffic.

Where there are gaps in survey work, uncertainties in methodology, unresolved design choices or material changes in construction logistics, the applicant should not rely on broad assumptions or future mitigation. The burden rests with the applicant to demonstrate that the proposal is acceptable.

It is our position that the consultation material has not yet demonstrated that affected communities have been given sufficient information to enable informed and meaningful engagement with the proposal.

CPRE West Yorkshire considers that the applicant should not proceed to a Development Consent Order application unless and until these matters have been fully assessed and subjected to further meaningful public consultation.

3. Designated sites, habitats and birds

Located within a Special Protection Area (SPA), Walshaw Moor supports a significant upland bird assemblage, including species of legislative or conservation importance, and the site contributes to the ecological connectivity of the South Pennine Moors SPA and SSSI.

The potential for habitat loss, disturbance, displacement, fragmentation and collision risk cannot be treated as a secondary matter. Where a proposal lies within or affects an internationally important ecological network, the assessment must be complete and capable of informing a lawful Habitats Regulations Assessment.

CPRE West Yorkshire is concerned that the proposal would fragment a highly sensitive upland habitat complex and affect species and habitats that are integral to the moor's designation and ecological function. The applicant has not demonstrated that significant harm to biodiversity can be avoided, adequately mitigated or, as a last resort, compensated, as required by NPPF paragraph 193(a) (the mitigation hierarchy). Nor has the applicant demonstrated that the separate SSSI test in NPPF paragraph 193(b) is met.

4. Blanket bog, deep peat, carbon, hydrology, flood risk and fire risk

Blanket bog¹ and deep peat are irreplaceable natural assets. They store carbon, regulate water, support specialised habitats and species, and contribute to the climate resilience of downstream communities.

The construction and operation of the proposed development would require tracks, turbine bases, crane pads, cable trenches, borrow pits and other infrastructure across a sensitive peatland landscape. CPRE West Yorkshire is concerned that such works could damage peat structure, alter hydrology, increase drying, increase carbon release, affect water flows and increase flood and fire risk.

The area forms part of the South Pennine Moors SAC, the South Pennine Moors Phase 2 SPA, and the South Pennine Moors SSSI — a triple statutory designation recognising it as an internationally and nationally significant upland blanket bog and peatland habitat. The applicant must demonstrate, with detailed peat, hydrological, geotechnical and carbon evidence, that the development would not result in the loss or deterioration of irreplaceable habitat² and would not increase flood risk in the Calder Valley or surrounding catchments. Based on the information currently available, CPRE West Yorkshire does not consider this to have been demonstrated.

Any carbon payback assessment must be based on robust, site-specific evidence, including peat depth, peat condition, drainage effects, construction impacts, restoration feasibility, cabling effects, borrow pit impacts and long-term maintenance requirements. Climate benefits cannot be assumed where the development itself risks degrading a major carbon store.

¹ The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 explicitly list blanket bog as an irreplaceable habitat. Furthermore, the NPPF glossary identifies blanket bog as irreplaceable habitat

² Paragraph 193(c) "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists"

5. Landscape, cultural heritage and Brontë Country

Walshaw Moor and the wider South Pennine landscape are not simply open land awaiting infrastructure. They form part of a deeply valued upland landscape with ecological, cultural, recreational and literary significance. The relationship between the moors, Haworth, Top Withins, the Brontë landscape and the wider public experience of this countryside is an important planning consideration.

CPRE West Yorkshire considers that the landscape and visual assessment must address not only viewpoints and turbine visibility, but also landscape character, tranquillity, sense of place, cumulative impact, cultural associations, public access and the contribution of the moorland setting to the identity of Brontë Country and the South Pennines. This is more than the visibility of individual turbines; it is the loss of the open, undeveloped character of the South Pennines moorland.

A development of this scale risks causing substantial harm to the character and experience of this landscape. CPRE West Yorkshire does not consider that this harm can be made acceptable by design mitigation alone. The scheme must address the proposals' 'cumulative landscape and visual impacts'³

The King's Bradford Pennine Gateway National Nature Reserve designation is a material change since the previous consultation; whilst not relied upon as a direct designation for the application site, CPRE West Yorkshire believes this strengthens recognition of the cultural heritage and landscape value of the site and should be specifically addressed in the proposals.

6. Construction traffic, aggregate importation and affected communities

The proposal will involve substantial construction logistics, including the importation of large quantities of aggregate and concrete materials, abnormal loads, HGV movements, and works on sensitive access routes across a constrained local highway network (including the A6033, Hebden Bridge, and narrow roads around Haworth).

CPRE West Yorkshire is concerned that the consultation on construction traffic and traffic routing may not satisfy the public law expectation, reflected in the Gunning Principles.

A project of this scale must be assessed on a realistic worst-case basis. If material construction traffic assumptions have changed, affected communities should be re-consulted with clear information on HGV numbers, routes, timing, highway safety, amenity, emissions, noise, road suitability, and mitigation measures.

³ EN-1 requires a landscape and visual impact assessment; EN-3 acknowledges that onshore windfarms may have a wider zone of visual influence

7. Conclusion and requested action

CPRE West Yorkshire recognises that nationally significant low-carbon energy infrastructure attracts very substantial policy weight under EN-1. However, that weight does not remove the applicant's obligations under the Habitats Regulations, nor does it override EN-3's specific requirements for onshore wind on peatland or EN-1's exceptions for unacceptable impacts on irreplaceable habitats and flood risk.

While NPPF paragraph 168(a) gives significant weight to the benefits of renewable and low-carbon energy, that general support must be read alongside the specific protections for SSSIs, irreplaceable habitats, and habitats sites in paragraphs 193 and 195, and it does not displace the Habitats Regulations.

Furthermore, paragraph 195 explicitly disapplies the presumption in favour of sustainable development entirely where significant effects on a habitats site cannot be ruled out without appropriate assessment.

The applicant has not demonstrated that the proposal avoids unacceptable harm to irreplaceable blanket bog, deep peat, protected habitats, protected species, hydrology, flood resilience, landscape character, cultural setting and affected communities. Nor has the applicant demonstrated that less damaging alternative locations have been properly assessed and ruled out.

CPRE West Yorkshire asks the applicant to withdraw the proposal or fundamentally relocate it away from Walshaw Moor.

If the applicant does not withdraw the proposal, CPRE West Yorkshire considers that further statutory consultation should be undertaken before any DCO application is submitted. That consultation should be based on complete and accessible evidence, including:

- a full, legally robust and policy-compliant alternatives assessment, addressing the requirements of EN-1 and EN-3, explaining why less sensitive sites have been ruled out;
- detailed peat depth, peat condition, hydrological and geotechnical surveys;
- a robust carbon balance and payback assessment reflecting peatland impacts;
- a full Habitats Regulations Assessment evidence base;
- updated bird, habitat and protected species assessment;
- a flood risk assessment that addresses catchment-scale effects;
- assessment of fire risk, including drying effects and cabling impacts;
- a full landscape, visual and cultural heritage assessment, including Brontë Country and the wider South Pennine setting;
- a realistic construction traffic assessment, including aggregate sourcing, HGV movements, routing and affected communities;
- a clear mitigation, compensation, restoration and long-term management strategy.

Until such evidence is provided, CPRE West Yorkshire does not consider the proposal to be environmentally acceptable or capable of informed public scrutiny.

CPRE West Yorkshire

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