

# Calderdale Energy Park

Response to the Preliminary Environmental Information Report

## Trawden Forest Parish Council

8 June 2026

### **Preliminary Comments**

Trawden Forest Parish Council (“TFPC”), representing the residents of Trawden, Cotton Tree, Winewall and Wycoller, objects to the proposed Calderdale Energy Park (CEP) development on Walshaw Moor on both on the grounds of generally inappropriate development and of specific, significant, local impact.

We fully endorse the detailed technical responses prepared by the Stronger Together (“ST”) coalition (For Peat’s Sake, Upper Calder Wildlife Network, Walshaw Turbines Research Group, and Worth Valley Against Walshaw Moor Wind Farm), which we do not repeat in detail here.

We acknowledge and support key strands of Colne Town Council’s (“CTC”) response, particularly on transport/AQMA impacts, aggregate logistics and due diligence failures, experiential landscape harm, and the implications for 30by30 and designated sites.

We are not against renewable energy. Our community supports the shift to cleaner sources and understands the need to address climate change. Many residents want a sustainable future. However, this proposal is fundamentally unsuitable for this location. It is a flawed project by an inexperienced developer on one of England's most sensitive and protected landscapes.

### **General Objections**

#### *1. Choice of a Triply Protected Site.*

Walshaw Moor forms part of the South Pennine Moors Site of Special Scientific Interest (SSSI), a national designation for its diverse upland plant communities, blanket bog, and ecological importance. It is also within the South Pennine Moors Special Area of Conservation (SAC) and Special Protection Area (SPA), offering international protection for irreplaceable peatland habitats and red-listed bird species. England’s 30by30 policy positions SACs/SPAs/SSSIs as the “backbone” of protected land. Industrializing the core of the South Pennine Moors SPA/SAC would undermine England’s delivery credibility and international leadership on biodiversity. CEP’s infrastructure mapping shows tracks and turbines concentrated in “high” and “very high” habitat sensitivity, so compounding harm inside the SAC.

The proposed industrialisation of an area nationally protected in the highest possible way is unforgivable. If this area cannot be preserved for its rarity, importance and

biodiversity, nowhere can. This is a fundamental challenge to our highest level of national categorisations. What is their purpose if they fail to protect?

## 2. Inappropriate Site – Flood and Landslides.

The CEP Non-Technical Summary (sections 4.4.6–4.4.9) acknowledges risks of surface water diversion, flood risk, and peat slide. These risks are not adequately addressed. The development area encompasses the site of the largest peat slide ever recorded in England. This is a matter of documented historical fact and must be given full weight in any assessment of the proposal. The potential for a further significant peat slide event triggered by construction activity, drainage disruption, or infrastructure failure, presents a serious and foreseeable risk to downstream communities, habitats, and watercourses.

The only AIL and bulk stone route ascends Crow Hill's north slope directly above Watersheddles Reservoir, across a locus with a documented cluster of peat failures (including 1989). CEP's peat depth probing and factor-of-safety analysis do not extend across the critical corridor, yet mapping shades it as low risk which is an unjustified inference. Independent scoring using CEP's own methods indicates at least moderate peat slide likelihood with high consequences during construction and permanently for reservoir safety.

Destructive floods have occurred in the very recent past on all sides of the Walshaw Moor site, from Hebden Bridge to Wycoller

## 3. Inappropriate Site – Construction.

The proposal's overcrowded layout, with turbines on steep gradients (>20% in places), further demonstrates poor fit for this protected landscape.

Local gritstone is too weak and porous for construction, which means that hundreds of thousands of tonnes of hard stone must be imported from outside Yorkshire and Lancashire. The British Geological Survey and annual West Yorkshire Aggregates Assessments have long stated local sandstones are too weak/porous for roadstone/structural concrete. During non-statutory consultation, CEP's public position still implied onsite borrow pits and "quarries to the east." CEP's late pivot away from borrow pits to massive imports evidences a basic failure of due diligence at inception, spilling into flawed scoping, traffic, carbon, and construction strategies. Neither we nor our neighbours, Colne and Laneshaw Bridge, were meaningfully consulted on the aggregate logistics that most affect them and were denied the chance to give intelligent consideration to this core effect while the design was flexible.

The PEIR (Table 22-13) quantifies the requirement as 280,000m<sup>3</sup> (616,000 tonnes) of imported material. The PEIR's traffic assessment relies on an assumption that Horton-in-Ribblesdale will serve as a railhead for 70% of this material, which is not evidenced and potentially infeasible. That facility was opened specifically for limestone export by rail to reduce lorry movements through the Dales, not as a receiving depot for imported non-calcareous hardstone. There is no stated unloading plant, stockyard or apron

capacity for import distribution. Using it as an import depot for alien hard stone would directly invert its consented purpose, and no application has been made to Yorkshire Dales National Park Authority on a material change of use. There is, therefore no firm basis for the traffic distribution and environmental statements predicated upon it.

#### 4. Inappropriate Site – Road Transport.

We support the CTC submissions and comments on the effect of traffic through Colne and its immediate environment, as this will also impact heavily on our residents as substantial users of Colne as their nearest town and the local, already highly congested, road system.

The 280,000m<sup>3</sup> (616,000 tonnes) of imported material requires approximately 61,600 HGV journeys over 16 months for aggregates alone, averaging ~3,850 journeys per month. We are concerned, as they are, about the impact of traffic increase causing exponential delays, the widespread rat-running on residential streets, historically recorded very high winter NO<sub>2</sub> levels, and structural damage to Victorian stone buildings and other structures.

We agree CTCs criticisms on the failure to provide baseline data on the key North Valley bottleneck, on air quality monitoring and on the impact of vibration. Developer representatives stated that detailed traffic modelling and formal LHA engagement would occur after permission. That is unacceptable for an NSIP where transport impacts are primary determinants of viability and harm.

#### 5. Inappropriate Site – Ecology.

At COP15, the UK endorsed the Kunming–Montreal Global Biodiversity Framework, including the “30by30” target. DEFRA policy frames SACs/SPAs/SSSIs as the backbone of England’s 30by30 delivery. CEP’s turbine area sits almost wholly within the South Pennine Moors SPA/SAC and fragments core habitat connectivity. Consenting an NSIP-scale wind farm inside the core of a national SAC/SPA risks reputational harm to the UK’s 30by30 leadership and emboldens derogations elsewhere.

CEP’s habitat sensitivity mapping shows tracks/turbines concentrated in “high” and “very high” sensitivity areas within the SAC. Borrow pits within the SAC will generate spoil voids and additional disturbance. The PEIR’s own baseline shows exceptional densities of red-listed breeding waders and raptors; walkers currently experience this abundance even from limited Public Rights of Way. The Moor is one of the last bastions for birds which have suffered from severe loss of habitat elsewhere.

Natural England’s scoping advice (omitted from the PEIR chapter) indicates most semi-natural vegetation on upland peat >0.3m should be treated as active/degraded blanket bog, all restorable, with peat-forming species widespread. Under-estimation of habitat loss, drainage zones of influence, and carbon emissions follows from misclassification. Offsite “compensation” for blanket bog integrity loss is not credible for irreplaceable habitats at this scale and designation status.

## 6. Inappropriate Site - Cultural Impact.

The site lies at the heart of the Brontë Moors which was the inspirational landscape for *Wuthering Heights*, *Jane Eyre*, and other works of world literary significance. It will have a visual impact on Top Withins. There has been a past UK Tentative List application for the "Brontë Landscape and Haworth Village" as a potential UNESCO World Heritage Site, reflecting its outstanding cultural value. While not yet inscribed, this highlights the global cultural importance that any development here risks damaging irreversibly.

The Brontë landscape is a high-sensitivity cultural receptor in its own right. CEP's assertion that appreciation of Brontë heritage does not rely on long-distance views ignores core experiential qualities (tranquillity, wildness, unbroken moor) and Bradford Council's advice to develop an innovative, evidence-based method for assessing impacts on cultural landscape and its international reputation.

Recreational value is not just functional access; it is the quality of the landscape through which routes pass. CEP would fundamentally alter the Pennine Way, Pennine Bridleway, Brontë Way, Mary Towneley Loop and other high-profile routes through lighting, movement, scale, and engineered form.

Hypercongestion in Colne and its surrounding villages and degraded landscape experience will deter visitors, equestrians, wildlife watchers, and quiet-recreation users. Claimed operational jobs (~10) do not offset wide-area losses to the visitor economy and cultural capital.

## 7. Mitigating Damage

The siting and number of turbines has changed and reduced on numerous occasions following representations by a large number of credible organisations, confirming that the initial proposal was launched on speculation and inadequate knowledge. The extent of the 'mitigations' which the developer has been obliged to propose to deal with the obvious inherent problems of the site demonstrate in themselves the fundamental fallacy in proposing Walshaw Moor in the first place.

They have tried to show that the risks to habitat and wildlife, the disturbance of deep peat, the dangers of water collection and run off, the effect on recreation and cultural heritage of this moorland, and the increase of traffic in the area can all be accommodated and are outweighed by the advantages of the development. We do not accept that calculation and rely on the previously mentioned detailed reports and comments.

The Outline Peat Management Plan relies on reusing excavated peat, yet acknowledges no detailed acrotelm/catotelm split. Excavation disrupts the fibrous geomatrix of peat (~95% water), making reuse unstable and prone to erosion/oxidation. This undermines the claimed restoration outcomes. Moving peat around to 'restore' earlier, damaging 'good ideas' for managing moorland is not the panacea that is claimed.

There is scant treatment in the PEIR of the risks of pollution from oil, diesel spill, and construction materials including cement and concrete. References to an unspecified emergency response procedure are insufficient. Of particular concern is the widespread and well-documented use of toxic waste-derived alternative fuels (such as Cemfuel) in cement production. Such materials can leach harmful compounds into surrounding soils and groundwaters over time, and this risk is not adequately addressed in the application documents.

The longer-term impact of construction runoff and pollution on groundwater feeding the reservoirs and many spring and bore-hole water-supplies in this area presents a clear risk to human health. These reservoirs, springs and bore-holes serve local communities and any contamination of the groundwater systems that feed them — whether through pollutant leaching, drainage disruption, or peat slide — would have serious and potentially long-lasting consequences. This risk requires rigorous, site-specific assessment and should not be dismissed by reference to generic mitigation measures.

#### *8. Failure to Consider Reasonable Alternatives.*

Chapter 5 of the PEIR inadequately addresses any such alternatives, contrary to EIA Regulations. Walshaw Moor's sensitivities of international designations, deep peat, and Brontë literary heritage should have been immediate red flags. It is a "super-outlier" in planning complexity. Friends of the Earth/Exeter University suitability mapping leaves Walshaw Moor blank for good reason; other, more appropriate, sites are indicated. The CEP alternatives shortlist was reverse-engineered to reflect Walshaw Moor's approximate area and gradients, not to identify least-impact sites.

As CTC points out, CEP's own wording shifts between "have been considered" and "is being carried out" on alternatives, indicating retrospective justification rather than a genuine front-loaded site search. The developer's lack of track record meant prime sites were unlikely to be offered by landowners, skewing selection toward marginal, high-risk terrain like Walshaw Moor, which is wholly inconsistent with the requirement to rule out peat and designated sites before selection. The whole process reflects "escalation of commitment" by an inexperienced team rather than robust site selection.

National Policy Statement EN-3 (Dec 2025) requires NSIP onshore wind applicants to justify siting on peatland and to rule out other locations before proposing peat sites. CEP's alternatives work does not meet that bar.

#### *9. Decommissioning*

Wind farms typically operate for 25–35 years. Decommissioning usually involves turbine removal, but on peatland sites like Walshaw Moor, full restoration is extremely difficult and often incomplete:

Permanent infrastructure will be left in place. Turbine foundations, access tracks, hardstandings, and buried cabling are frequently left (as noted in parliamentary debate and campaign responses). Removing them would cause further peat disturbance and carbon release.

Hydrological damage is likely to be permanent. Tracks and concrete alter drainage permanently, drying peat, increasing erosion/flood risk, and reducing carbon storage. Restoration to active blanket bog is challenging and may never fully succeed.

The site would remain a degraded, semi-industrial moorland — scarred by tracks and concrete, with limited ecological recovery. The track network will alter recreational behaviour permanently, increasing disturbance pressure deep within the SPA/SAC as e-bikes and dogs will access previously quiet areas. This long-tail pressure extends well beyond turbine removal timelines and is not credibly mitigated in the PEIR.

Walshaw Moor might see limited "restoration" planting or continued low-level management, but it would lose its wild, open character forever. Full return to pristine peatland habitat (as required for SAC/SSSI/SPA) is unrealistic given the scale of intervention.

Although we are repeatedly told that the operating lifespan of CEP is 35 years and all will be restored thereafter, the reality is that there is the distinct possibility of future phases coming forward. We are well aware that early discussions were held to include not just a BESS (on a highly flammable, ecologically precious moor), but also solar panels arrays.

#### *10. Inherent Deficiencies in the Proposal.*

ST and CTC, amongst others, highlight the serious deficiencies in the PEIR relating to inadequate mapping, mis-labelling, mis-numbering, mis-matching, mis-quoting, mis-interpretation and the numerous changes to and lack of detailing in the proposals, which we do not repeat here but which raise serious concerns. Baseline data in many areas has still not been obtained. It was confirmed to us during the recent public consultations that, even now, deep peat mapping of the area has not been completed.

#### **Specific Local Impact**

TFPC make all the significant objections above but there are, within those general issues, substantial specific impacts on our Parish.

##### *1. Traffic through Trawden Parish*

The route proposed for the construction traffic is via the M65, and along the North Valley corridor representing (according to CEP) a 16% increase in HGV movements on an route which is already heavily congested at all times of day and in both directions.

Any delays or perceived delays in driving through Colne increases the number of vehicles trying to avoid it by going through Trawden. The village of Trawden is single lane for much of its length due to parked vehicles. It has significant pedestrian footfall with a shop, community centre, library, pub, doctors' surgery, nursery, primary school and bus route, and is without pavements for some of its length. It already experiences difficult traffic conditions including occasional gridlock due to lack of two way passage. Any increase in traffic diverted from Colne will create greater problems, delays and dangers

for residents, pedestrians and local businesses. Significantly, the developer's own traffic expert confirmed at consultation that he had not visited Trawden.

## 2. Flood Risk

The hamlet of Wycoller faces increased flood risk from the disturbance of the Moor during construction of the turbines and access route. Wycoller is an internationally recognised heritage site: Wycoller Hall was the basis for Ferndean Manor in Jane Eyre, and the hamlet was home to the last handloom weaver. It is a Conservation Area with nine Grade II and four Grade II\* listed structures at its heart. Critically, Wycoller has already suffered two major flood events caused by moorland runoff, damaging listed structures. This is documented evidence of actual harm, not hypothetical risk, and must be given full weight in any assessment of construction impacts on drainage and surface water from the Moor.

## 3. Visual Impact

The new access route cuts across open country from above Laneshawbridge and will be visible from the Country Park and the several well-used, long distance paths which traverse the hills above the valley of Wycoller; the Bronte Way, the Pendle Way, the Lancashire Way and the Pennine Bridleway. The developer's transport spokesman said that the access would be visible only temporarily during the construction phase, but the landscape spokesman confirmed that it would remain in existence for the lifetime of the project i.e. for *at least* 25-30 years. Its impact on a protected historic landscape should, therefore, be assessed as a permanent new road, not as a temporary construction access. The visual harm to walkers on nationally recognised routes will be sustained and significant.

## 4. Business and Leisure

Trawden Forest has a local economy which is dependent on its rural surroundings and its cultural heritage. It has a significant tourism and leisure element with both day and longer stay visitors catered for. It has a Community Centre, Shop and Pub and other small businesses which rely on visitors and local residents (in what is a spread out community) being able to access them easily by road, whether by car, bike, bus, horse or on foot. Tourists visit for the access to the environment of the South Pennines via any of the smaller footpaths and the National Trails which take them onto the moors. They come for peace and quiet on the edge of the post-industrial towns of Yorkshire and Lancashire.

Experiential qualities recognised by GLVIA3 such as tranquillity, wildness, dark skies, and landscape coherence, are central to why people visit and live here. CEP's permanent aviation lighting, moving blades, and engineered tracks would erode those qualities irreversibly. The loss of the sights and evocative sounds of the wildlife specific to this type of wild landscape would degrade the area.

## **Conclusion**

This is not opposition to renewables. It is a strong objection to the wrong project in what is manifestly the wrong place. Better sites exist in England that avoid SSSI/SAC/SPA protections, deep peat, and landscapes of international cultural importance.

We urge the Planning Inspectorate, relevant authorities, and the Secretary of State to reject this proposal due to inadequate due diligence, repeated errors, failure on alternatives, and fundamental unsuitability.

Signed on behalf of Trawden Parish Council

Councillor Ann Holmes

Chair, Trawden Parish Council