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Yorkshire Wildlife Trust Non-Technical Summary: Calderdale Energy Park Scoping Report

Yorkshire Wildlife Trust (YWT) supports the transition to renewable energy and the reduction of fossil fuel consumption. Despite this we are aware that renewable infrastructure can still generate environmental harm depending on its location. After reviewing the latest project updates for Calderdale Energy Park, YWT maintains a strong **objection to the principle** of the proposed development, due to its siting on peatland and within internationally designated protected landscapes.

YWT acknowledges the urgent threat posed by climate change and supports the UK's goal of achieving net zero carbon emissions by 2050. We **do not oppose renewable energy development** but rather the inappropriateness of this specific site. Research cited¹ within our latest consultation response ([Follow link here](#)) to the Applicant's EIA Scoping Report ([Follow link here](#)) argues that wind farms should not be sited on peatlands because of the net carbon loss that would occur as a result of the disruption, also due to the availability of alternative, less environmentally damaging locations.

Primary Concerns: Peatland and Designated Sites

The 2,352-hectare proposal would directly affect extensive areas of blanket bog, an irreplaceable, internationally important habitat². The development of this 41-turbine windfarm would require foundations, borrow pits, extensive hardstanding, tracks, and a large Battery Energy Storage System (BESS), causing long-term degradation of peatland hydrology and structure. YWT maintains that such impacts cannot be successfully mitigated against or compensated for in this location.

The site also lies within the South Pennines Special Area of Conservation (SAC) and South Pennines Moors Special Protection Area (SPA). The proposal threatens the integrity of these sites through habitat loss, disturbance, potential bird strike, and impacts on land functionally linked to designated features of these protected landscapes. Conservation objectives for these sites, including restoring blanket bog and degraded peat as well as maintaining habitat for golden plover, merlin, and other moorland birds, would be compromised. YWT argues that any Habitats Regulations Assessment (HRA) would likely reveal the need for this windfarm to be located on an alternative, less damaging site, making approval from the Secretary of State, unjustifiable.

¹ *Wind farms on undegraded peatlands are unlikely to reduce future carbon emissions (2013)*, Jo Smith, Dali Rani Nayak, Pete Smith, *Institute of Biological & Environmental Science, University of Aberdeen*.

² *Irreplaceable habitat - GOV.UK*



Mitigation Hierarchy and Policy Conflict

YWT stresses that the project fails at the first stage of the mitigation hierarchy: *avoidance*. According to the National Planning Policy Framework (NPPF)³, if significant ecological harm cannot be avoided, mitigated, or compensated for, applications should be refused. Draft National Policy Statements (NPSs) similarly require robust avoidance and mitigation for impacts of development on peatland. We consider the Applicant's suggestion of off-site blanket bog compensation is unachievable and disproportionate given the scale of this application.

The Applicant's EIA Scoping Report's reliance on the Rochdale Envelope Approach⁴ (worst-case assessment flexibility) is concerning: YWT argues the report does not genuinely adopt worst-case assumptions, particularly regarding peat disturbance and carbon emissions. Large areas of hardstanding and the associated infrastructure would exert cumulative pressures on peat, biodiversity, hydrology, and increase flood risk as a result as peat is a homogenous and linked entity, which cannot be compartmentalised nor localised effects thereon be considered in isolation.

Biodiversity and Survey Gaps

YWT have identified major gaps in baseline data presented in the Applicant's ecological reporting to date, especially within the cable corridor route and access areas; we have criticised premature decisions to scope out certain areas, including Walshaw Dean Reservoirs. These reservoirs are integral to downstream hydrology and YWT is concerned that should the application be granted approval, nearby settlements such as Hebden Bridge, could experience adverse cumulative impacts on water quality, habitat, and increased flood risk, in an already flood prone area.

YWT also highlights risks to bats, reptiles, and great crested newts. Although the applicant has extended survey buffer zones for bats, YWT argues that disturbance from construction, lighting, noise, and long-term operational impacts would undermine the quiet, undisturbed nature of this upland habitat. For great crested newts, YWT asserts that the 250m buffer is insufficient given the scale of this application, recommending an expansion to 500m in line with Government guidance⁵.

³ *National Planning Policy Framework - 16. Conserving and enhancing the historic environment - Guidance - GOV.UK*

⁴ *Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope - GOV.UK*

⁵ *Great crested newts: advice for making planning decisions - GOV.UK*



Irreplaceable Habitat and Restoration Conflict

Walshaw Moor is already undergoing a long-term, government-funded blanket bog restoration programme (2017–2042). Construction of a major windfarm is fundamentally incompatible with these efforts. Restoration requires maintaining hydrological integrity: peatland hydrology is continuous, meaning any alteration such as turbine bases, tracks, or cable trenches; will damage the wider system. The Applicant's suggestion that excavated peat could be reused for restoration uses (e.g., repairing bare peat) are not scientifically feasible.

YWT notes that the presence of dry or degraded heath on deep peat should still be considered degraded bog⁶, meaning the area of irreplaceable habitat is larger than acknowledged by the Applicant in their ecological reporting. The Trust concludes that no meaningful compensation is possible because peatlands are ancient habitats that form over millennia. Furthermore, mandatory Biodiversity Net Gain (BNG) requirements will be difficult, if not impossible, to meet, especially since enhancements must exceed obligations already set out in the current, active restoration plan⁷.

Hydrology, Flooding, and Water Quality

The development risks exacerbating flood events downstream, particularly in Hebden Bridge; which historically has already been severely affected by flooding. Construction would also increase sediment flow into reservoirs, affecting water quality and requiring additional treatment. YWT emphasises that peatland hydrology operates as a single, connected system; any intervention will have site-wide consequences. To date, the applicant has provided no convincing strategy for preventing erosion in peat gullies, maintaining hydrological balance, or avoiding nutrient contamination of ombrotrophic bog systems.

Carbon and Climate Change

The Trust also highlights the lack of robust carbon accounting published to date. Several consultees, including Natural England and Heptonstall Parish Council, raise concerns about the carbon consequences of peat disturbance, embodied carbon in materials, and long-term operational impacts. YWT notes that the EIA Scoping Report does not adequately account for:

- carbon emissions from peat oxidation during construction, operation, and decommissioning

⁶ *Definition of Favourable Conservation Status for Heathland - RP2977*

⁷ *Walshaw Moor Estate Catchment Restoration 2017-2042 Plan - MRP002*





- embodied carbon in turbine manufacture, transport, and materials
- long-term emissions from disturbed peat only partially restored
- increased fire risk caused by drying peat
- carbon released from constructing tracks and hardstanding on deep peat

All factors that we feel are vital in considering the long-term implications this application could have on climate change.

Decommissioning and Long-Term Stewardship

Although the windfarm is marketed as temporary construction (c.40-year lifespan), the impacts on peatland are irreversible. YWT is concerned that post-decommissioning land management would revert to the landowner with limited regulatory oversight. To comply with BNG principles, restored or compensated habitats should be secured permanently; something the applicant cannot currently commit to.

Conclusion

In summary, YWT view that Calderdale Energy Park is an inappropriate development in such an exceptionally sensitive location. This is due to the unavoidable and permanent damage that this development would have to peatland; the conflict with national conservation and climate objectives, and the risks to protected landscapes and habitats, as well as to local communities. Although YWT supports renewable energy development in principle, we believe that this project must be refused due to its unacceptable ecological and climate impacts.

