



DATE: 1st June 2026

Yorkshire Wildlife Trust Position Summary- Calderdale Energy Park (CEP)

YWT **Objects to the Principle of this Application** for the following key principles:

1. Inadequacy of the PEIR and Supporting Evidence

This PEIR is insufficient to allow an informed assessment from consultees, despite the Applicant's legal requirements to enable such at this stage. Insufficient survey information and outdated methodologies have been used; we dispute the Applicant's application of the Rochdale Envelope Approach, as, due to the lack of adequate assessment, worst case scenarios have not been shown throughout, resulting in significant effects being underestimated. The responsibility lies with the Applicant to demonstrate that the proposal is acceptable; currently the extremely inadequate reporting does not deliver this; leading YWT to doubt the validity of this consultation. As presented the proposal is contrary to National Planning Policy, presents significant and unresolved environmental risks, and is supported by inadequate evidence. Irrespective of the quality of the PEIR, we maintain our objection due to the following principles:

2. Inappropriate Location – Loss of Irreplaceable Habitat

The PEIR Boundary contains large areas of an irreplaceable habitat, blanket bog, the loss of which cannot be compensated for within any human timescale. The Applicant has failed to demonstrate compliance with National Planning Policy requirements, that irreplaceable habitats should be avoided unless wholly exceptional circumstances and that other suitable locations have been ruled out before siting onshore wind on peatland. We therefore view this Site as being entirely unsuitable for onshore wind deployment.

3. Inappropriate Location – Protected Sites and Key Species

The site is ecologically triple (statutory) designated, supporting internationally important moorland habitats and critically-endangered bird species. This development presents a high likelihood of significant adverse impacts including priority habitat loss, fragmentation, and protected species displacement. The Applicant has not demonstrated how these impacts can be avoided or adequately mitigated; by siting the development in this location, this proposal undermines established conservation objectives at local, national and international levels.

4. Flood Risk – Insufficient Evidence and Unresolved Concerns

The Applicant has not demonstrated that the development would not exacerbate existing flood risk to surrounding areas. Upland peat ecosystems play a critical role in natural water regulation, and their disturbance can elevate flood risk. In separating peat from hydrology, the Applicant demonstrates a lack of understanding of peatland ecosystems. There is no recognition that the proposed infrastructure, the majority of which will become permanent landscape features, further compartmentalises the hydrology of the site, promoting further peat degradation.





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5. Fire Risk – Increased Vulnerability of Degraded Moorland.

Damaged peatlands are more prone to drying and ignition, thereby heightening the likelihood and severity of fires. Thermal impacts from the cabling have not been assessed; heat produced from which could promote further drying, increasing fire risk across the moorland habitats.

6. Alternative Sites and Net Zero Objectives

While the development may contribute to broader net zero targets, this does not justify its location within this sensitive environment. There is no evidence of a robust and transparent site selection process nor that alternative locations have been assessed or discounted; this is a failure to meet policy requirements. To take the Applicant's carbon-budget at face value, the peat restoration must be exemplary and use peat in good condition; there is no peat condition-survey, and their plans show a poor grasp of upland peatland restoration. We are not convinced the peat extraction volumes have been correctly calculated. A Scottish Government review of the Applicant's carbon calculator reports that it requires "significant update to accurately reflect a carbon 'payback time' in relation to land use emissions"; for example, the payback from pastureland is four times lower than development on peat soils, due to the carbon content of the peat. There is also lack of reference to Natural England's existing peatland restoration plan for the Site.

Kind regards,

The Planning Team
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Yorkshire Wildlife Trust is the only charity entirely dedicated to
conserving, protecting and enhancing Yorkshire's wildlife and wild places