



Yorkshire
Wildlife Trust

1 St. George's Place,
York, YO24 1GN

☎ 01904 659570

🐦 @yorkswildlife

📘 Yorkshire Wildlife Trust

📷 yorkshirewildlifetrust_

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Yorkshire Wildlife Trust Consultation Response: Calderdale Energy Park (CEP) NSIP, Preliminary Environmental Investigation Report (PEIR)

0.1 Introduction

Yorkshire Wildlife Trust (YWT) supports the government's target to reach net zero, recognising that climate change not only threatens biodiversity but poses much wider environmental, social and economic risks. We understand that transitioning to renewable energy is a critical part of this effort and fully support the move towards cleaner energy generation. However, it is essential that this transition does not result in avoidable, severe or long-term harm to nature, and therefore that individual renewable energy projects are located and designed to keep ecological and environmental impacts to an absolute minimum. YWT **Object to the Principle of the Application** for Calderdale Energy Park (CEP); in line with the principles of fairness and due process, this decision has been made following consideration of the Preliminary Environmental Investigation Report (PEIR).

0.2 Position Summary

Following review of the PEIR, YWT **Objects to the Principle of this Application** for the following key reasons:

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 Insufficient survey information and outdated methodologies have been used; we dispute the Applicant's application of the Rochdale Envelope Approach, as, due to the lack of adequate assessment, worst case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. We have detailed these concerns between pages 4-10, however this principle for objecting is relative to all comments on PEIR chapters within this response.

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. Our detailed comments on Biodiversity can be found from pg. 11 and on Peat and Hydrology from pg. 24.

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. Our detailed comments on Biodiversity and Ornithology can be found from pages 11 and from 19.

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. Our detailed comments on Hydrology are from page 24.

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. Our detailed comments on Peat can be found from pg. 24, where these impacts are addressed.

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 developer's carbon calculator, as used by the Applicant, reports that it requires "*significant update to accurately reflect a carbon 'payback time' in relation to land use emissions*"; development on peat soils can result in carbon payback times around four times longer than development on pastureland because of the large quantities of carbon stored in peat. There is also lack of reference to Natural England's existing peatland restoration plan for the Site. Our comments on suitable alternatives can be found from page 7 and on Net Zero Objectives from page 27.

As both an environmental charity and the strongest voice for Yorkshire's nature, we reserve the right to object against and comment on any proposal which we believe is contrary to our objectives. Where we view there have been inconsistencies, errors or omissions in the Applicant's reporting, we have raised concerns throughout. Due to the volume of reporting, we have structured this response so that it can be easily referenced back to the to the corresponding PEIR chapters.



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1.0- Project Proposal (Chapters 1-6 & 24)

The Environmental Statement (ES) is due to be submitted to the Planning Inspectorate (PINs) in late 2026; at present, due to the level of information presented in this PEIR, the Applicant has many questions to answer before the Development Consent Order (DCO) submission. Given the appropriate timing and duration of survey seasons¹, we are not confident that the Applicant will be able to produce what is required for a satisfactory DCO Application. Where the Applicant states (1.2.16) the format of the PEIR is as a draft ES: we would argue that the number of omissions, lack of published data and inconsistencies throughout the report, make this an inadequate draft. It has limited YWT's ability to input into this consultation as it has for other consultees with valuable technical expertise, contrary to the aims set out in the Statement of Community Consultation, 2026².

1.1- Environmental Impact Assessment (Chapter 2)

The Environmental Impact Assessment (EIA) process³ must truthfully present the significant effects likely, allowing decision makers to either approve an application or not. As this PEIR shows, CEP would result in numerous significant effects (2.1.4), and the Applicant has stated (2.1.1):

“The purpose of the Environmental Impact Assessment (EIA) process is to protect the environment by ensuring that those responsible for making decisions on whether development consent should be granted have information on whether the Proposed Development is likely to give rise to significant environmental effects.”

They have also stated (2.4.1) that they value views of consultees and members of the public following this public consultation. We disagree that the ecological reporting has been adequate to satisfy the requirements of the EIA Process, as it has not demonstrated that the Applicant values the views of consultees⁴. It is prudent here to draw attention to Government advice:

“A good PEI document is one that enables consultees (both specialist and non-specialist) to understand the likely environmental effects of the Proposed Development and helps to inform their consultation responses.”⁵

This is supported by Regulation 12(2)(b) of the EIA Regulations (2017)⁶. Contrary to the above, very few mitigation proposals have been included in this PEIR; the reason cited is due to ongoing discussions with statutory consultees such as Natural England (NE) and the assurance that more detail will be available in the ES. The number of inconsistencies, inconclusive chapters and missing data within this PEIR and supporting appendices, has not enabled YWT to form a full view of the extent of resultant significant effects, limiting our opportunity to respond impactfully through the consultation.

¹ CIEEM (2023) *Good Practice Guidance for Habitats and Species, Version 3 May 2021*. Found at: <https://cieem.net/wp-content/uploads/2021/05/Good-Practice-Guide-2023-edit.pdf>

² Calderdale Wind Farm Ltd (2026) Statement of Community Consultation. Found at: [Calderdale-Energy-Park-SoCC-Final-April26.pdf](#)

³ The process of Environmental Impact Assessment in the context of town and country planning in England is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the '2017 Regulations'). Ref: Ministry of Housing Communities Local Government (2017) Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

⁴ YWT had the same comments following the EIA Scoping Report in 2025, a copy of which can be found on our website: <https://www.ywt.org.uk/calderdale-energy-park>

⁵ Planning Inspectorate (2020) Nationally Significant Infrastructure Projects - Advice Note Seven: Environmental Impact Assessment: process, preliminary environmental information and environmental statements. Found at: <https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-seven-environmental-impact-assessment-process-preliminary-environmental-information-and-env>

⁶ Ministry of Housing Communities Local Government (2017) Town and Country Planning (Environmental Impact Assessment) Regulations 2017

1.2- Description of the PEIR Boundary and Surrounding Areas (Chapter 3)

Within the Site description (3.2.14), we feel it is remiss of the Applicant not to transparently reference irreplaceable habitats peat and blanket bog⁷. Impacts on blanket bog forms a key part of YWT's objection; by definition, it is irreplaceable due to the millennia in which it has taken to form; as Principle 2 of our position summary states, YWT view this Application is entirely unsuitable in the proposed location.

The Applicant states that the Site lies *partially* within the South Pennines Moors Site of Special Scientific Interest (SSSI), South Pennine Moors Special Area of Conservation (SAC), and South Pennine Moors Phase 2 Special Protection Area (SPA). Whilst not entirely untrue, it is misleading, as the Site in fact lies a *majority* of 91.76% within the South Pennines Moors SSSI/SAC/ SPA. This leads us to view that the Applicant is minimising the likely significant effects of the proposal.

The Applicant mentions the Site is located within the Liverpool, Manchester and West Yorks Green Belt. The Planning Portal⁸ indicates where the Green Belt is distributed across England and contradicts the Applicant's reporting, showing the Site is located within the *E08000033/South and West Yorkshire Green Belt*, which should be corrected. Additionally, Greenbelt land is protected from development⁹, therefore justification as to why this site has been earmarked for development despite the restrictions in place, should be described.

In the PINs response to the EIA Scoping Report¹⁰ they disagreed with the proposal to scope out Walshaw Dean Reservoirs. Whilst we are pleased that this has been adhered to, the description of watercourses within the PEIR Boundary (3.2.16) and risks of surface water flooding due to them, is insufficient. It is remis that peat is not referenced, as these gulleys and ditches are peatland landscape features; please refer to our comments on impacts on Peat, pg. 22, for further detail.

1.3 - Incorrect Application of the Rochdale Envelope Approach (REA) (Chapter 4)

YWT have previously questioned the Applicant's use of the Rochdale Envelope Approach¹¹ (REA). The PEIR shows that the Applicant is still utilising this approach (4.2.4). The REA is described in NPS EN-3¹² Policy 2.6.2: *"Where flexibility is sought in the consent as a result, applicants should, to be best of their knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development."* We do not agree the PEIR has presented worst case scenarios; an example being the description of the foundation design. The following does not concur with the REA on a simple level, as stating minimum estimates for foundation depths: *"they are likely to be a minimum of 4m deep."* (4.3.4) is not providing a worst-case scenario in terms of the gravity-based foundation design.

We acknowledge that it is not possible to guarantee figures at this stage, however, still including minimum estimates is not inspiring confidence that proper calculations have been undertaken (the

⁷ Department for Environment, Food & Rural Affairs (2024) *Irreplaceable habitats*. Found at: <https://www.gov.uk/guidance/irreplaceable-habitats>

⁸ *Planning and Housing Data: Green Belt Calderdale* (2025). Available at: <https://www.planning.data.gov.uk/entity/610161#53.699593154883445,-2.044911130691844,9.528258699565916z> (Accessed:2026.06.08)

⁹ Ministry of Housing Communities & Local Government (2019) *Guidance Green Belt: Advice on the role of the Green Belt in the planning system*. Found at: [Green Belt - GOV.UK](https://www.gov.uk/government/publications/green-belt-guidance)

¹⁰ Planning Inspectorate (on behalf of the Secretary of State) (2025) *SCOPING OPINION: Proposed Calderdale Energy Park Case Reference: EN0110023*.

¹¹ The Planning Inspectorate (2018). *Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope*. [Online]. Available at: <https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-nine-rochdale-envelope/nationally-significant-infrastructure-projects-advice-note-nine-rochdale-envelope>

¹² Department for Energy Security & Net Zero (2025) *National Policy Statement for Energy (EN-3)* Found at: <https://assets.publishing.service.gov.uk/media/695d1368b5c46330350ed9a2/national-policy-statement-for-renewable-energy-infrastructure-en-3-web-accessible.pdf>

same estimates were included in the 2025 EIA Scoping report) therefore we must question whether this Application is policy compliant. This leads YWT to doubt the accuracy of the peat loss calculations included throughout the PEIR. If worst case scenarios are not being used to calculate amounts of peat likely to be lost or displaced because of excavating the foundations for each turbine¹³, then the estimated volumes of peat lost will be misleading.

1.4- Construction Impacts of the Proposed Development (Chapter 4)

Ground contamination resulting from the construction is of great concern, due to the long-term impacts that this could cause on peat and the blanket bog. The Applicant states consideration of these impacts will be addressed in the ES (4.3.6) which has, limited our opportunity to comment. Due to the scale of impact, more consideration should be given at this PEIR stage. Regarding light pollution, the Applicant states, there is potential for the Turbines to be fitted with aviation lighting, as all are proposed to be over 150m in height (4.3.7). Again, this is a significant effect that would change the nature of the Site. If an unknown number of turbines will have aviation light fitted and the REA is correctly applied, it should be assumed that all will, and this should be transparently stated.

For hardstanding areas required for the associated infrastructure, which, in many cases will be permanent features within the landscape post decommissioning, the Applicant has provided estimated land take areas (4.3.9) of approximately 5,000m². Whilst we welcome these transparent estimates, which provides consultees realistic figures to work from, we note estimates for the borrow pits are not included. We view this as an important omission, as due to the nature of the onsite quarrying, the volumes of these borrow pits will likely be substantial¹⁴. There are also worryingly vague descriptions (4.3.11) of how excavated peat will be dealt with during and after the construction period.

This is evidence of the lack of consideration applied to this crucial component of the construction of CEP, which will have harmful environmental implications and is of huge concern (see comments on Peat, from pg. 23). The description of working hours and significant effects from construction and decommissioning has been outlined, in Table 4-2. The Applicant has committed to producing a series of management plans for the construction and decommissioning phases. Whilst we have concerns regarding the ecological impacts of the construction, we cannot comment on proposed mitigation or compensatory measures as the relevant management plans are not available¹⁵.

Whilst this development is being cited as temporary, the foundations and tracks will be left in perpetuity (4.4.11), therefore will be permanent features across the Site. The infrastructure left within the landscape, will permanently impact the integrity of the Site. Given the presence of irreplaceable habitat and the Site supporting internationally important populations of birds, we view this as wholly unacceptable. The Applicant states that where infrastructure will be removed, the land will be restored to its original baseline condition, however the affected land will be in a permanently altered state due to these permanent interventions.

Considering the lack of biodiversity enhancement proposals at this stage (see comments on Biodiversity from pg.11), or condition assessments of the peat and blanket bog (see comments on Peat from pg. 24), this statement is meaningless to consultees. We are disappointed that throughout these PEIR chapters 1-5, consultees have not been given the opportunity to comment on such crucial

¹³ These are likely to vary due to the ground conditions across the expansive order limits.

¹⁴ Smith, J et al. (2013) *Wind farms on undegraded peatlands are unlikely to reduce future carbon emissions*. Institute of Biological & Environmental Science, University of Aberdeen, UK.

¹⁵ Appendix 4-2: Outline Construction Environmental Management Plan (oCEMP) was included in the PEIR documents, it states: "A revised oCEMP will be submitted as part of the DCO Application, which will consider the latest environmental and engineering details, consultation responses and feedback with stakeholders" We have not been able to refer to it for any relevant mitigation methods, as the detail is lacking at PEIR stage and it is incomplete.

mitigation methods regarding the impacts that the construction of CEP will have on the Site and beyond it, on the SPA/SAC/SSSI.

1.5- Consideration of Alternatives (Chapter 5)

The Applicant commits to producing a Site Selection Report supporting the ES (5.1.3). Without being able to comment on the Report, we remain unconvinced that alternatives have been considered properly (Principle 6, Position Summary). The Applicant has referenced National Policy Statement (NPS) EN-1 to justify their decision not to present a study of alternatives at PEIR stage (5.2.3) However, when read in conjunction with the NPS EN-3 paragraph 4.3.9 and Regulation 14(2)(d) and Schedule 4, para 2 of the EIA Regulations¹⁶, these **would** suggest that policy advises an assessment of alternatives **is required**. Therefore, we would advise the Applicant reconsiders their approach if they are to submit a policy compliant DCO Application.

In addition to the Site Selection Report, they have committed to produce a Statement of Need (5.3.9), detailing the developments justification further. YWT understand that nationally significant, low carbon infrastructure benefits from a policy presumption in favour of consent¹⁷. As our Position Summary states, it is not the need for onshore windfarm deployment we object to, rather the inappropriate location of the proposal. As a result, we are concerned the Applicant has not considered the ‘do nothing Approach’ in their assessment (5.4.1). There is a restoration plan for Walshaw Moor, produced by Natural England¹⁸; it would have been relevant to reference this within this chapter, as the carbon sequestration resulting from peatland restoration on the Site, would be a carbon saving outcome of the ‘do nothing approach.’

The Applicant commits to presenting their Site Selection Methodology in the ES, however, previous applications for CEP took place in 2023, therefore surely the study into suitable alternatives must have been undertaken in the infancy of the project proposal? Due to this, we expected to see examples of alternatives presented within the PEIR, to demonstrate transparency during this public consultation.

The Royal Society for the Protection of Birds (RSPB) published research¹⁹ informing the production of an Opportunities Map²⁰ for onshore wind deployment within the UK. They caveat that this resource is not intended to inform site selection, however it is informative when considering the potential of a site in relation to its ecological sensitivity. We are aligned with the RSPB, as they support the shift to renewable energy and reaching government targets for net zero by 2050²¹: “However, reducing emissions through use of renewable energy sources can also lead to environmental impacts. Some impacts can be minimised through appropriate siting²²” When considering what constitutes as ‘appropriate siting,’ the research concludes:

¹⁶ Ministry of Housing Communities Local Government (2017) Town and Country Planning (Environmental Impact Assessment) Regulations 2017

¹⁷ Calderdale Wind Farm Ltd (2026) Preliminary Environmental Investigation Report. *Chapter 6: Legislative and Planning Policy Context*. Pg. 2

¹⁸ Natural England (2017) Walshaw Moor Estate Catchment Restoration 2017-2042. Found at: [Walshaw Catchment Restoration Plan.pdf](#)

¹⁹ Gove B, Williams LJ, Beresford AE, Roddis P, Campbell C, Teuten E, et al. (2016) Reconciling Biodiversity Conservation and Widespread Deployment of Renewable Energy Technologies in the UK. *PLoS ONE*11(5): e0150956. doi:10.1371/journal.pone.0150956

²⁰ RSPB (2018) *Onshore wind opportunity showing sensitivity and constraints WF*. Available at: [Onshore wind opportunity showing sensitivity and constraints WFS | RSPB Open Data](#)

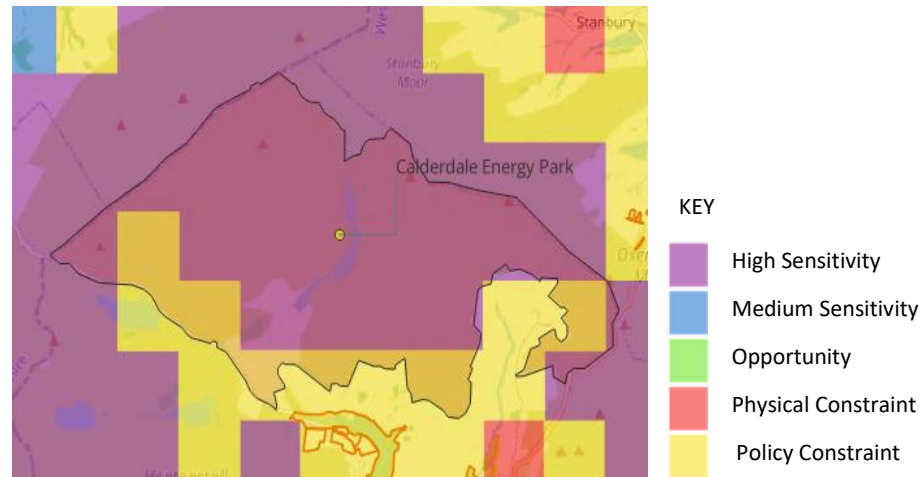
²¹ Department for Energy Security and Net Zero (2021) *Policy paper, Net Zero Strategy: Build Back Greener*. Found at: <https://www.gov.uk/government/publications/net-zero-strategy>

²² Benedict Gove et al.(2016) *Reconciling Biodiversity Conservation and Widespread Deployment of Renewable Energy Technologies in the UK*. Pg. 1. Found at: <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0150956>

“The majority of the UK (96.3% of the total land area) has sufficient wind resource to be suitable for harnessing wind energy [...] In total, 19.2% of the UK land area had high ecological sensitivity to wind turbines and 17.4% had medium ecological sensitivity, leaving 63.4% as low/unknown sensitivity (Figs 2B and 3). In the low ecological risk scenario 5,932 km² (2.4% of the UK land area) was potentially available for onshore wind deployment”²³

Resultantly, it does not seem probable that no other alternative sites could be identified. As shown below in *Figure.1*, the Site is either highly ecologically sensitive or restricted from development by policy constraints²⁴, which suggest it to be entirely unsuitable for onshore wind deployment.

Figure. 1:
Calderdale Energy Park - Onshore wind opportunity showing sensitivity and constraints WFS | RSPB Open Data Map (YWT QGIS)



Local policy²⁵ has set targets for achieving Net Zero by 2038, the energy generation predicted by CEP, would undoubtedly benefit these aims. The RSPB data and Opportunities Map indicates locations within Yorkshire, Cumbria and Lancashire where there is opportunity for onshore wind deployment, on land of areas comparable to CEP’s proposed area that is of low ecological sensitivity and not constrained by policy. These range between 5090 ha in North Yorkshire, 2230 ha in Cumbria and 1750 ha in Lancashire, and we would expect similar areas to have been assessed as alternatives.

We expect to see robust assessment presented in the Site Selection Report to comply with the requirements of NPS EN-3²⁶ and the EIA Regulations. These policies legislate that reasonable alternatives and justification for the preferred option, are described at PEIR stage - the lack of such is cause for huge concern and reinforces our position that this is an inappropriate location for CEP (refer to our position summary pg. 1).

1.6- Design Evolution (Chapter 5)

YWT view that appropriate designs and technology should be used to minimise all ecological and environmental impacts to the maximum extent possible. Both the Precautionary Principle and cumulative effects must be factored into the design, assessment and approval of any project, which we do not view has been done in this PEIR. The Applicant has presented their design methodology (5.6.11): Table 5.1: *BRAG (Black, Red, Amber, Green) Appraisal Approach*; no examples of the

²³ Benedict Gove et al.(2016) *Reconciling Biodiversity Conservation and Widespread Deployment of Renewable Energy Technologies in the UK*. Pg.11.Found at: <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0150956>

²⁴ Data set from: Benedict Gove et al.(2016) *Reconciling Biodiversity Conservation and Widespread Deployment of Renewable Energy Technologies in the UK*. Found at: <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0150956>

²⁵ Calderdale Council (2023) *Calderdale Climate Action Plan 2023-2036*. Found at:

<https://new.calderdale.gov.uk/sites/default/files/2024-04/Calderdale%20Climate%20Action%20Plan%202023.pdf>

²⁶ Department for Energy Security & Net Zero (2025) *National Policy Statement for Energy (EN-3)* Found at:

<https://assets.publishing.service.gov.uk/media/695d1368b5c46330350ed9a2/national-policy-statement-for-renewable-energy-infrastructure-en-3-web-accessible.pdf>

application of this methodology have been included, therefore no precedent to demonstrate it is an appropriate method. It would have been more transparent for the Applicant to demonstrate how the BRAG criteria were applied in relation to the proposed development areas and to explain the process followed. We note the Applicant derived the BRAG Methodology, therefore YWT cannot vouch for it based on prior experience of its effectiveness.

Descriptions of the first planning application for an energy park on the Site, are included to show how the design has evolved; 65 turbines, reduced to 34 (5.7.2). Whilst the reduction in turbine numbers since the 2023 Application, is an improvement; the turbine foundations, alongside the plethora of associated infrastructure, resulting in approximately 559,645 m³ (refer to comments on pg. 23) of peat and blanket bog being displaced, will still have detrimental effects at scale, which we do not believe has been adequately addressed in this PEIR.

1.7- Legislative and Planning Policy Context (Chapters 4 & 6)

YWT believes that all due process and diligence (statutory, Government policy and established industry best practice) must be followed by Applicants during any renewable power proposal application²⁷. Whilst NPS EN-1 explains why the Secretary of State (SoS) considers energy NSIPs with a presumption in favour of development, it gives equal weighting to the appropriate consideration of negative impacts. NPS EN-1 states projects should be avoided where a proposal will demonstrably cause significant impacts on priority habitats, protected/key species or those habitats/species of conservation concern at the national or international level.

Here the planning balance comes into play, as whilst the energy predicted to be produced by CEP is of national importance, many species and habitats potentially affected are of international importance, as the PEIR Boundary is on land designated as an SAC/SPA (refer to comments on Biodiversity from pg. 11). The Applicant has responded to the relevant policies in Table 6-1, stating the final assessment of impacts will be presented within the ES, alongside evidence of how the mitigation hierarchy has been applied; we have serious concerns that this assessment of impacts is not available for consultation. Also, given the presence of irreplaceable habitat and designated land within the order limits, we do not view that the mitigation hierarchy was applied in the first instance. We note the commitment to producing a Habitat Regulations Assessment (HRA), in Table 6.1, in relation to NPS EN-1 paragraphs 4.1.20 and 4.1.21, which we welcome. We hope to see the HRA address many of our current concerns, however, given the DCO submission in mere months, it would have been encouraging to see more detail at PEIR stage.

1.8- Cumulative Effects (Chapter 24)

Schedule 4 paragraph 5(e) of the EIA Regulations 2017²⁸, requires the ES to include a description of the likely significant effects of the development on the environment resulting from:

“The cumulation of effects with other existing and, or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.”

Impacts of other approved windfarms nearby should be considered as inter-project effects. We are concerned that the Applicant has described their inter-project cumulative impact methodology (24.1.1) as not considering completed windfarms as inter project cumulative impacts, as baseline assessments have captured these impacts. We view this as a startling decision given the number of

²⁷ Department for Energy Security & Net Zero (2025) *National Policy Statement for Energy (EN-1)* Paragraph 4.1.3. Found at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1-2025/overarching-national-policy-statement-for-energy-en-1-2025-accessible-webpage>

²⁸ Ministry of Housing Communities Local Government (2017) *Town and Country Planning (Environmental Impact Assessment) Regulations 2017*

windfarms in the area; even more startling considering the inadequate nature of baseline assessments that have informed this PEIR. There are six windfarms within 15km of the PEIR Boundary. Scout Moor is 13km away and has been subject to numerous campaigns from concerned environmental organisations, due to its location on peatland²⁹.

This lack of consideration is especially concerning when viewed in conjunction with the rising opposition against windfarm development on peatland nationally. Examples of this include the Government's 2025 petition³⁰ and the aforementioned opposition to an extension to Scout Moor³¹ amongst others³². Given the traction that this issue is gaining in parliament³³, which YWT have supported over fears that this project could become precedent setting in England, we find the Applicant's decision to scope already constructed windfarms out of their cumulative assessment as negligent.

The Applicant states (24.1.3) in their conclusions regarding cumulative impacts, both inter and intra effects, have not been reached and will be included in the ES - therefore we cannot provide meaningful comments. We can highlight that where the Applicant has cited that they have complied with local and national policies: NPS-EN1, NPS EN-3, Calderdale Local Plan, Bradford Local Plan; if they do not adequately address the requirements of the above, they will not be obeying planning law and the Secretary of State for Energy Security and Net Zero (SoS) has the responsibility to refuse this application.

1.9- Project Proposal Conclusions

At present, YWT are not confident that the Applicant will be able to provide crucial, adequate resource before the DCO submission, given the overall impression that the necessary work has not been completed by the Applicant, across these PEIR Chapters. Despite the preliminary nature of this PEIR, given the Site has been earmarked for development for several years, the lack of proper assessment of impacts, is very concerning and does not indicate an appropriately robust assessment has been undertaken.

²⁹ BBC (2024) *Why a wind farm saga is entering its third decade*. BBC News. Found at: <https://www.bbc.co.uk/news/articles/c2e7jvv2l1ko>

³⁰ *Ban wind farms on protected peat land in England* (2025) Found at: <https://petition.parliament.uk/petitions/701290#main-content> (Accessed: 08.06.2026)

³¹ New Petition - Say No to Scout Moor 2 (2025) Found at: <https://saynotoscoutmoor2.org.uk/new-petition-launched-by-local-resident/> (Accessed: 08.06.2026)

³² Alba launch petition to halt onshore wind farm development in Scotland (2025) Found at: <https://www.thenational.scot/news/25658896.alba-launch-petition-halt-onshore-wind-farm-development-scotland/> (Accessed: 08.06.2026)

³³ Ares. E & Sutherland. N (2026) *Research Briefing: Windfarm development on protected peatland*. House of Commons Library. Found at: <https://commonslibrary.parliament.uk/research-briefings/cbp-10630/>

2.0- Biodiversity (Chapter 8)

YWT recognises that a major driver in the push for renewables is the protection of the natural environment. We therefore must ensure that we do not cause avoidable, severe or long-term impacts to our habitats and species in the quest to ultimately protect them. Whilst YWT understand and support the need to achieve Net Zero in the UK by 2050 and applaud local ambition to achieve this by 2038, renewable energy developments must acknowledge and respect the importance of areas which are recognised or designated for being of local, national or international importance for nature conservation.

2.1- Insufficient Surveys Presented in the PEIR

We note further surveys³⁴ are required across the PEIR Boundary, Bradford West Cable Corridor and Western Access route. Of the surveys that have been completed we have concerns over their validity. The UKHab and condition assessment surveys were undertaken in September - November 2023 (Turbine Area) and September 2025 (Western Access Route). Surveys in October and November are outside of the botanical survey season and are therefore likely to have limitations, such as missing species; therefore, these survey results may undervalue the importance and diversity of the habitats surveyed.

The surveys within the Turbine area are out of date as ecological data is only valid for 18 months³⁵. UKHab surveys are proposed to be completed for the Access and Cable Corridor Routes in Spring-Summer 2026, however, updating the already surveyed areas is not mentioned. Condition Assessments are proposed, for the Turbine Area: May-August 2026. Again, no reference to updating any of the Access and Cable Corridor routes is included, which should be corrected.

The UKHab documentation the Applicant references³⁶ is an outdated methodology, they must use UKHab V2 documentation³⁷ during updated surveys. We do note that Appendix 08-3 states that UKHab V2 was used for the Turbine Area, so may be another error in the Applicant's reporting - we suggest this is checked and corrected accordingly.

MoRPh surveys have not been undertaken on watercourses present in the Access and Cable Corridor Routes; only the Turbine Area is included in the scope. Figures A1-10 and A1-15 within Appendix 08-1 show watercourses are present within these areas, therefore need to be included in the scope of Biodiversity Net Gain (BNG) baseline. Where these MoRPh surveys have been scoped in, the results for Turbine Area are not presented in this PEIR. **All** watercourses present on or within 10m of the red line boundary need to be accounted for within the baseline assessment, regardless of impacts. Further surveys are required for fungi; high level fungi walkovers have only encompassed the Turbine Area³⁸ – these surveys need to include Access and Cable Corridor Routes, or the Applicant needs to explain why these areas have been scoped out of this assessment.

Given the known presence of internationally important populations of CHEGD fungi within the PEIR Boundary, we are disappointed that eDNA survey techniques have not been adopted by the Applicant. Analysis of soil samples can detect CHEGD fungi even when fruitbodies are absent, providing a more comprehensive understanding of fungal biodiversity. We view this as a significant omission.

³⁴ Calderdale Energy Park LTD (2026) *Chapter 8: Biodiversity*. Preliminary Environmental Investigation Report (PEIR). Pg. 63. Table 8-11: Summary of Planned Further Surveys.

³⁵ CIEEM (2019) *Advice Note On The Lifespan Of Ecological Reports & Surveys*. Found at: <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

³⁶ Calderdale Energy Park LTD (2026) *Chapter 8: Biodiversity*. Preliminary Environmental Investigation Report (PEIR). Pg. 26. Table 8-6: Summary of Field Survey Approaches up to the End of 2025.

³⁷ UKHab Ltd. (2023). *UK Habitat Classification Version 2.0*. Found at: <https://www.ukhab.org>

³⁸ Calderdale Energy Park LTD (2026) *Chapter 8: Biodiversity*. Preliminary Environmental Investigation Report (PEIR). Pg. 29. Table 8-6.

According to the CHEGD Assessment System, the Turbine Area supports an exceptionally rich site for waxcaps, indicating these are long established grasslands, supporting at least 2 International Union for Conservation of Nature (IUCN) classified (vulnerable and endangered) CHEGD species, which this PEIR states is of international importance³⁹. Resources⁴⁰ indicate that a diverse CHEGD community is an indicator of an 'ancient grassland'. Whilst not yet considered to be an 'irreplaceable habitat' under the official government definition, the term 'ancient' suggests that these grasslands are likely to bare a similar ecological significance to other ancient irreplaceable habitats, such as ancient woodlands; therefore, these should be afforded the same weight when considering impacts. Work commissioned by PlantLife and the British Ecological Society⁴¹ has proposed definitions of ancient grasslands, as well as proposed primary criteria. Due to this, we would recommend development on these habitats be avoided in the first instance and request consultation with stakeholders (such as PlantLife) to determine the likely 'ancient' status of these grasslands.

One of the priorities of the West Yorkshire Local Nature Recovery Strategy (WY LNRS) is to enhance West Yorkshire's diverse ancient grasslands⁴². WY LNRS reiterates that Calderdale is an internationally important diverse area for CHEGD fungi. Given the importance for this development to align with the aims of the WY LNRS, we would like to see greater attention paid to this in the ES once robust surveys for CHEGD fungi have been completed.

2.2- Biodiversity Net Gain

The Applicant has referenced the policies⁴³ they state they have complied with and presented the results of the Scoping Opinion, redefining their assessment scope as a result. These include:

- South Pennine Moors SAC - the BNG Impact pathway has been identified and a preliminary assessment in Section 8.8 of the PEIR;
- Their approach to BNG is outlined in Section 8.6 of the PEIR.

We must question the following statement within the BNG approach description (8.6.5):

“BNG requirements relating to Irreplaceable Habitats are particularly relevant to the Turbine Area due to the large areas of blanket bog which are present. Bespoke agreements and strategies are required to account for any losses to such habitats and will need to be agreed in principle with relevant consultees”

We would remind the Applicant that impacts to irreplaceable habitats cannot form part of any BNG calculations, due to their nature of being **irreplaceable**. BNG calculations can only be completed following agreement of compensation and mitigation approaches for designated sites and protected species. Here we have noticed a discrepancy in reporting - later in the chapter the Applicant has acknowledged guidance from NE that where there are impacts to irreplaceable habitats,

³⁹ Calderdale Energy Park LTD (2026) *Chapter 8: Biodiversity*. Preliminary Environmental Investigation Report (PEIR). pg. 58. Appendix 08-2 - Table 8-9: Terrestrial Ecology Baseline.

⁴⁰ People's Trust for Endangered Species (2025) *Defining and protecting ancient grassland*. Found at: <https://ptes.org/grants/uk-mammal-projects/defining-ancient-grassland/> (Accessed: 08.06.2026)

⁴¹ British Ecological Society (2024) *Discussion Paper On Ancient Grasslands*. Found at: <https://www.plantlife.org.uk/wp-content/uploads/2024/11/FINAL-discussion-paper-on-ancient-grassland-with-consultee-list-and-minor-revisions.pdf>

⁴² West Yorkshire Combines Authority (2026) *Local Nature Local Nature Recovery Strategy*. Pg.51. Found at: <https://www.yourvoice.westyorks-ca.gov.uk/wynature>

⁴³Environment Act 2021 (Environment Act 2021) NPS EN-1 and EN-5: Section 4.6 outlines requirement for BNG (National Policy Statements for energy infrastructure - GOV.UK, NPPF (current): Section 15 outlines requirement for enhancing natural environment (National Planning Policy Framework - 15. Conserving and enhancing the natural environment - Guidance - GOV.UK), Calderdale BNG SPD (Calderdale Council - Adopted Biodiversity Net Gain SPD - Local Planning Policy), Bradford District Local Plan - EN2 (Bradford Council Core Strategy Development Plan Document)

enhancement of irreplaceable habitats cannot form part of the BNG calculation. We support this as per best practice guidance⁴⁴ and recommend the Applicant revisits the above statement for clarity.

We note there is no BNG Assessment or Metric available, limiting our ability to comment. As we have addressed above, we acknowledge that the Applicant is not completing BNG calculations until compensation and mitigation is agreed for irreplaceable habitats, following NSIP guidance and consultation with NE. Despite this, we are disappointed that a draft baseline metric has not been produced for review.

The use of the statutory biodiversity metric is committed to (8.6.6) and will be supported by a BNG Plan and Habitat Management and Monitoring Plan (HMMP) accompanying the DCO Application - we request opportunity to review when available. These plans should encompass the Turbine Area in addition to the Access and Cable Corridor Routes to allow for a comprehensive assessment.

Regarding additionality, there is a commitment (8.6.7) to consider the Walshaw Moor Catchment Restoration Plan in relation to any mitigation with respect to protected species and designated sites. Here we must reiterate the rules regarding additionality in BNG, i.e. any mitigation for the relevant SACs⁴⁵ and any protected species, can only count up to 0% within the statutory metric. 10% BNG needs to be achieved outside of these commitments and may require offsite offsetting. We welcome this is acknowledged at this stage and again, request the opportunity to review details of how this has been considered within the metric.

The Applicant has acknowledged (8.6.8) that comprehensive mitigation and compensation is required and likely to be delivered in a combination of onsite and offsite and have stated the intention to retain and enhance onsite habitats. We would explicitly like to see a commitment to the Biodiversity Net Gain Hierarchy, which is: 1) Avoid irreplaceable habitats and habitats which have a medium - very high distinctiveness; 2) Mitigate adverse effects to these habitats if they cannot be avoided; 3) Compensate in relation to all onsite habitats which are adversely affected by the development.

The adverse effects should be compensated for by prioritising, in order: 1) Onsite enhancement; 2) Creation of new onsite habitats; 3) Offsite unit allocation and finally 4) Statutory credits. YWT request to see a commitment to satisfy the trading rules in the first instance (as per Rule 1 of the statutory user guide⁴⁶). We would add that any mitigation and compensation should aim to work towards the goals set out within the WY LNRS⁴⁷. BNG guidance for NSIPs released on the 2nd June 2026⁴⁸ has not altered any of the statements we are making in this section.

⁴⁴ CIEEM (2019) *Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide*. Found at: <https://cieem.net/wp-content/uploads/2019/02/C776a-Biodiversity-net-gain.-Good-practice-principles-for-development.-A-practical-guide-web.pdf>

⁴⁵ Designated Sites View: South Pennine Moors SAC (2026) Available at: <https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK0030280&SiteName=south%20pennine&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=> (Accessed: 08.06.2026)

⁴⁶ Department for Environment for Food & Rural Affairs (2024) *The Statutory Biodiversity Metric – User Guide*. Found at: https://assets.publishing.service.gov.uk/media/6a1d98e9c7335e2ca6daadd5/The_Statutory_Biodiversity_Metric_-_User_Guide_-_June_2026.pdf

⁴⁷ West Yorkshire Combines Authority (2026) *Local Nature Local Nature Recovery Strategy*. Found at: <https://www.yourvoice.westyorks-ca.gov.uk/wynature>

⁴⁸ Biodiversity net gain: nationally significant infrastructure projects (2026) Department for Environment, Food & Rural Affairs. Found at: <https://www.gov.uk/government/collections/biodiversity-net-gain-nationally-significant-infrastructure-projects>

2.3- Irreplaceable Habitats

The term 'irreplaceable habitat'⁴⁹ is clear - the habitats are irreplaceable and therefore should be avoided as the highest priority, as no amount of bespoke strategy could feasibly compensate for damage to and loss of these habitats. Therefore, alternative locations for this development should be considered – as per YWT's second principle for objecting to this application.

Irreplaceable habitats are (8.6.5) particularly relevant to the Turbine Area, due to large areas of blanket bog being present.

We note the Habitat Baseline Report⁵⁰ (HBR) only covers the Turbine Area and a portion of Western cable route. Blanket bog is likely to be relevant to each of the Access and Cable Corridors Routes (8.5.4), again, as an irreplaceable habitat, this should be avoided in the first instance- therefore exclusion of the access and cable routes from the PEIR is inadequate at this stage.

This PEIR includes consideration of ancient woodland / veteran trees in Sections 8.5 and 8.7. Whilst we welcome these preliminary studies demonstrating a wider scope for assessment of impacts to nature, due to the Applicant stating that more information will be presented in the ES, we cannot comment. Figure A1-3 (Appendix 08-1) shows a veteran tree as well as a 'notable' tree within the Turbine Area. Further Veteran Tree Surveys should be undertaken to determine whether it is classed as a veteran tree; if so, it should be classified as an irreplaceable habitat under BNG. We would recommend that this be conducted in tandem with scheduled UKHab and condition assessment surveys. We are disappointed to note there is no indication as to whether these trees are to be retained within the proposals - as irreplaceable habitats, they should be avoided in the first instance.

As well as irreplaceable habitats, the PEIR provides a baseline assessment of other habitats. The HBR highlights the importance and distinctiveness of the habitats present within the Turbine Area, the majority being classified as a blanket bog habitat (5.1.1), and more heterogenous than first anticipated (5.1.2). We are disappointed to note that Appendix 08-3 is a baseline report and therefore it is beyond its remit to comment on impacts. As it is presented, this PEIR does not fully consider the proposals and resultantly, the potential impacts in full for the development, we view this as inadequate and is a limitation to our comments and those of other consultees.

The Applicant has described the methodology (4.4.2) for ongoing survey efforts. When considering the scale of the development, YWT would agree that this is pragmatic for re-surveying going forward. Despite viewing the methodology acceptable, this should include ongoing surveys required in the Turbine Area, as well as the Access and Cable Corridor Routes for a comprehensive assessment. The Access and Cable Corridor Routes have only undergone high-level assessments (8.5.1 - 8.5.4); these need to be surveyed as is planned (8.5.8) or risk the DCO Application being insufficient.

2.4- Priority Habitats

Of the surveyed areas (Turbine Area and Western Access Route), Table 8-9 indicates that these areas overlap with areas of blanket bog and upland heathland. Priority habitats such as upland heathland should also be avoided by developers, particularly in reference to avoidance measures for associated designated sites (refer to our comments above regarding irreplaceable habitats for blanket bog and CHEGD fungi).

A high-level (desktop) assessment of the Access and Cable Corridor Routes has been conducted which we argue is insufficiently robust given the DCO submission deadline. Table 8-9 indicates that the Access and Cable Corridor Routes overlap with five potential priority habitats: blanket bog, grass

⁴⁹ Irreplaceable habitat (2024) Found at: <https://www.gov.uk/guidance/irreplaceable-habitats> (Accessed: 08.06.2026)

⁵⁰ Calderdale Energy Park LTD (2026) Chapter 8: Biodiversity. Preliminary Environmental Investigation Report (PEIR) Appendix 08-3 - Habitat Baseline Report (2023-2025).

moorland, upland heathland, fragmented heath and deciduous woodland. Again, further surveys are required to determine whether these priority habitats are within these areas and if so, they should be avoided in the first instance. As it is likely that priority habitats will be present (8.5.4) we are disappointed that the Applicant is stating presence is not known at this stage.

2.5- Direct Land Take

As a Site of international importance through the SAC designation, direct impacts, such as land take on this site, should be avoided to prevent impacts to these habitats in the first instance. YWT have published *Bringing Yorkshire's Nature Back, a blueprint for nature's recovery*⁵¹, the opportunities of which build upon international guidance, current government policy and YWT's *State of Yorkshire's Nature Report*⁵², 2024. *Blueprint Opportunities 1: Improve protected areas* and *3: Revitalise our protected landscape*, are both relevant here; in order to achieve national objectives of 30% of land positively managed for nature by 2030, 30 by 30, a legally binding target the Government has committed to⁵³ and to achieve nature's recovery in Yorkshire, we cannot afford to lose a percentage of this protected Site. Resultantly, YWT do not view the predicted land take that will occur because of this development to be acceptable.

The Applicant states that the direct loss of riparian habitat will be presented in the ES, as well as the types of river crossings (closed pipe culvert / bottomless arch culvert / bridge structure) following further hydraulic assessment (8.8.133 - 8.8.134). Here we must reiterate that this must include MoRPh survey efforts where relevant for BNG. Watercourse alignment will be modified by installation of culverts - resulting in permanent landscape changes. The PEIR states this would not be significant, which we disagree with considering the hydrological regime of the Site and the lack of mitigation presented. This statement needs to be supported by evidence from the hydrological assessment, which is currently lacking:

"8.8.141 Further analysis to model and quantify water volume and quality changes will be completed as part of the ES and used to assess the potential impacts on riparian habitats"

"8.8.142 Habitat management and restoration measures will be developed under the HMMP to minimise indirect habitat loss and degradation of rivers and will include specific enhancement measures relating to watercourses."

The statements above have limited our opportunity to comment. Changes in surface and sub-surface hydrology are considered highly likely due to the sensitivity of the habitats (8.8.37) - resulting in another 80ha of habitat being lost including 44.4ha of blanket bog (Table 8-16). Currently, permanent changes to the hydrology of the Site are predicted to result in a medium magnitude of impact that will require mitigation and compensation (8.8.40). Due to the changes in hydrology, that would result in permanent habitat loss, rather than direct land take, in addition to the direct dependence of the condition of the blanket bog and wet heath on hydrology, we would argue that this cannot be less of an impact than the direct land take highlighted above - we would therefore consider this to be at least a high magnitude impact and recommend the Applicant revisits their conclusions.

⁵¹ Yorkshire Wildlife Trust (2025) *Bringing Yorkshire's Nature Back, a blueprint for nature's recovery*. Found at: <https://www.ywt.org.uk/blog/rachael-bice/our-blueprint-natures-recovery>

⁵² Yorkshire wildlife Trust (2024) *State of Yorkshire's Nature*. Found at: <https://www.ywt.org.uk/StateofNature>

⁵³ Research shows that 30% of land positively managed for nature is the minimum required to achieve the international targets established in the 2022 *Kunming-Montreal Global Biodiversity Framework*, which aims to effectively conserve and manage at least 30% of land, waters and seas by 2030. YWT's Blueprint has identified seven opportunities for delivering 30 by 30 for Yorkshire, these structure our *Blueprint*: 1. *Improve protected areas*, 2. *Protect more places for nature*, 3. *Revitalise our Protected Landscapes*, 4. *Create new nature-rich landscapes*, 5. *Reconnect wild spaces*, 6. *Restore threatened species*, 7. *Mobilise nature positive communities*

Permanent habitat loss is considered for multiple elements of the development (8.8.12), however, further temporary losses will be considered in the ES. In addition, habitat loss associated with watercourse crossings is not included in the total areas, as the design has not yet confirmed the nature of these crossings (8.8.16). Currently, the proposal will impact blanket bog, European dry heath, North Atlantic wet heath (SAC designations), upland flushes, fens and swamps, and upland acid grassland (SSSI designations). These impacts are predicted to result in a 'high magnitude impact' that will require mitigation and compensation (8.8.28).

Upon review, YWT anticipate impacts to be greater to the SAC/SSSI than is currently depicted⁵⁴ - currently 67.2ha of permanent direct loss of habitat, 31.9ha of which is classed as blanket bog (see comments above on irreplaceable habitats) (Table 8-15). Section 8.8.26 also states, that estimations of permanent loss will be confirmed in the ES so impacts could yet increase- which we view as completely unacceptable given the location.

Not only habitats within the PEIR Boundary will be affected; currently, it has been identified that the Access and Cable Corridor Routes overlap with sites of conservation value. Nan Scar Clough Local Wildlife Site (LWS) overlaps with the Eastern Access Route and Bradford West Cable Corridor, also Corn Close and Bent Moor LWS overlap with Western Access Route. At Nan Scar Clough LWS, c.60m of the Export Cable is proposed, running perpendicular to the LWS. Methods for the Export Cable are still to be finalised but worst-case scenario open trenching assumes that this impact would be temporary and habitats could be restored. Provided this is not the acidic woodland habitat for which the site is designated, we would view this reasonable, but we would need to view the plan for habitat restoration, to accept the methodology.

2.6- Recreational Pressures

Recreational pressures on the habitats within the PEIR Boundary are a likely significant effect of the development. The Turbine Area is crossed by several Public Rights of Way (PRoW) (8.8.75), the Pennine Way, which passes South to North through the Turbine Area, may need to be closed or re-routed because of construction activity. This may encourage recreational use through sensitive habitats (8.8.76) - which could result in irreversible damage⁵⁵. In addition, the development will increase viable access to the Site with new permanent access routes (8.8.85). Subsequently, YWT would assume that the permanent loss from direct land take and hydrological impacts predicted within the PEIR is an underestimation of the total direct impacts.

An Onsite Access Management Plan is committed to (8.8.79) - we would like to comment on this when available. In the absence of baseline recreational data and an access strategy which accounts for likely increases in recreational impacts, the total magnitude of impact cannot be estimated. Therefore, a significant adverse effect on the South Pennine Moors SAC and SSSI cannot be ruled out at this stage

Regarding decommissioning, in the absence of detailed decommissioning activities described, it is not possible to accurately assess the various likely significant effects identified on SAC/SSSI habitat features. Therefore we cannot rule out significant adverse effects at this stage and do not feel they have been accurately presented in the PEIR, which is concerning.

2.7- Fauna

(Chapter 8: pg. 50 onwards)

⁵⁴ South Pennine Moors SAC is 65,025.5ha - therefore this direct land take permanent loss results in 0.1% of the SAC being permanently lost. In addition to the 67.2ha above, this additional 80ha lost through hydrology now results in 147.2ha (0.23%) of the SAC being permanently lost.

⁵⁵ Gilchrist, A., Glentworth, J., Mohd Radzuan, H.S. and Clay, C.D. (2023). *The Influence of Recreational Activity on Upland Ecosystems in the UK: A Review of Evidence*. NEER025. Natural England.

Table 8-6 (Chapter 8, pg. 26) details that multiple ecological surveys within the Turbine Area, cable corridor, and western access route remain outstanding. A swathe of supporting survey data relating to bats, amphibians, reptiles, otter, water vole, badger, invertebrates, and fish is therefore not presented within the PEIR for review. In the absence of this survey data, we disagree with the following statement, that this chapter “presents a preliminary assessment of the likely significant environmental effects of the Proposed Development upon biodiversity” (8.1.11). Given the amount of outstanding survey data relating to such large areas of the proposed development, we do not believe that an accurate assessment of the “likely significant environmental effects of the Proposed Development”, preliminary or otherwise, has been robustly carried out to inform the PEIR at this stage.

The Applicant states that a “potentially significant effect” on bats during the operational phase includes collision resulting in injury and death (8.8.173) and that permanent impacts on bats are also likely due to the direct land take associated with the proposals. We view these potential impacts to multiple species of legislative international importance as unacceptable. With bat surveys having been conducted within the Turbine Area and a turbine layout provided to inform this PEIR, we are disappointed with the absence of preliminary mitigations methods within the PEIR, limiting our comments.

The 2023-24 baseline survey (Table 8-9) concludes that terrestrial and aquatic habitats within the Turbine Area are suitable to support an assemblage of amphibian species and include opportunities for refugia and hibernacula, alongside a wide distribution of watercourses and waterbodies. With Great Crested Newt (GCN) already having been confirmed as present within the Turbine Area ahead of further 2026 surveys, we are surprised to see that the Applicant has provided no discussion as to likely impacts on amphibians during the operational phase. Given the maintenance activities and other indirect impacts which will impact the PEIR Boundary’s functionality in supporting amphibians, we are disappointed that no operational impacts with regards to GCN or other amphibians have been discussed and view this as an omission.

The Applicant states that further surveys are required to provide confidence in the magnitude of impacts (8.8.218) to reptiles. However, no further reptile surveys are detailed within Table 8-11, which we note as an error in their reporting and suggest is rectified.

The Applicant has indicated potential significant effects on otters and water vole during all phases, and that further surveys, risk and impact assessments are ongoing, the results of which will be published in the ES. However, we note an omission; there is no mention of the impacts of the introduction of toxic pollutants into the environment from construction activities, dust deposition and changes in levels of recreational activity on either otter or water vole. Given the known otter holt present within the order limits, with spraints widely recorded across the Turbine Area (8.8.236), we are disappointed at the lack of proposed assessment regarding these potential impacts.

Table 2-1 of Appendix 08-2 (Terrestrial Ecology Report) summarises the protected species surveys undertaken within the Turbine Area, with surveys for protected mammals having taken place September-November 2023. In addition to the fact that this ecological survey data is now considered to be out of date⁵⁶, paragraph 2.3.3 details that otter and water vole surveys were carried out mid-April-September. YWT request clarification as to the number and timings of water vole surveys carried out by the Applicant.

The introduction of toxic pollutants and dust deposition have also not been considered for assessment when identifying potential impacts to fish and invertebrates (including crayfish). Given

⁵⁶ CIEEM (2019) *Advice Note On The Lifespan Of Ecological Reports & Surveys*. Found at: <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

the wide distribution of watercourses and waterbodies within the PEIR Boundary, and the fact that many of these are yet to be surveyed, we view this as an omission from the Applicant's overall assessment.

2.8- Biodiversity Conclusions

Much of the mitigation and compensation for habitats are in draft, or to be included in the ES. Several reports are committed to but are not available. As we have stated previously, not providing consultees opportunity to comment on proposed mitigation and compensation is a detrimental limitation; as is the absence of any preliminary BNG assessments to review. A multitude of further assessments have not begun; given the appropriate timing and duration of ecological surveys, we are not confident that the Applicant will be able to submit a complete a fully informed DCO submission. The impact on habitats presented is currently insufficient to indicate a robust assessment of ecological impacts, the reliance on outdated and incomplete survey data, undermines confidence in the current baseline reporting throughout.

Of particular concern is the apparent underestimation of impacts to irreplaceable habitats, other priority habitats and internationally important CHEGD fungi. The potential scale of habitat loss and hydrological changes suggests impacts may be greater than currently presented. The Applicant has identified potentially significant effects across all species of fauna included within the PEIR but relies heavily on incomplete survey data and ongoing assessment. Substantial clarification, complete survey results and preliminary mitigation proposals are required to indicate robust assessment has been undertaken, which we currently dispute. We must also highlight the poor quality of the reporting, due to the number of errors throughout.

3.0- Ornithology (Chapter 9)

The South Pennine Moors Phase 2 SPA is of European importance for supporting several upland breeding species of bird, including waders and birds of prey. With regards to the SPA and the individual species and/or species assemblage for which the site is designated, the conservation objectives⁵⁷ for the SPA detail the high-level, legal objectives for the site. The Applicant is yet to demonstrate how the proposals successfully align with both these conservation objectives and the published South Pennine Moors Site Improvement Plan⁵⁸, again bringing into question the siting of these proposals and the likely impacts upon the designated features associated with this upland site of international importance.

The PEIR reports (9.9.14) how upland habitats form key components of the breeding and foraging resource for the upland bird species/assemblage detailed within the SPA and SSSI citations. Paragraph 9.9.15 states:

"Construction activities have the potential to remove or degrade these habitats temporarily or permanently"

There is no *potential* in the context of this development. These habitats will be lost, whether this be from permanent, direct land take or indirectly from other impacts of this development. Given that 91.76% of the Proposed Development lies within the SPA and SSSI, any loss or alteration of these habitats would directly affect the ecological resources upon which the qualifying features rely. The PEIR details that 59 confirmed breeding species and 15 probable breeding species were recorded across the PEIR Boundary, 70 of which are considered priority species as defined in paragraph 9.4.7, highlighting the ornithological significance of the Site. In addition, a total of 86 species were recorded during the non-breeding seasons, with 53 species being considered priority species, confirming the year-round importance of the Site in supporting a diverse bird assemblage of significant conservation importance. The PEIR states that, in cases where species recorded belong to populations of the SPA (9.4.39):

"[...] if the populations of the species recorded within/in close proximity to the Proposed Development exceeded 1% of the cited population estimates for those species for the SPA, the populations recorded will be assessed as being potentially significant in the context of the SPA. As such, any adverse effects on those populations could result in adverse effects on ornithological features of international and/or national importance and therefore undermine the integrity of such designated sites."

3.1- SPA Individual Qualifying Species (included under the citation of the SPA)

Across the survey period, a peak of 40 breeding pairs of golden plover were recorded, approximately 14% of the estimated SPA breeding population (292 pairs)⁵⁹. A peak of 5 breeding pairs of merlin were recorded, approximately 18% of the estimated SPA breeding population (28 pairs)⁶⁰. It is concerning that the Applicant has concluded within Table 9-12 that the recorded golden plover breeding population should be considered of only regional importance and that of merlin should be considered of national importance, when assessing the potential level of impacts from the development on these two species.

⁵⁷ Natural England (2014) *European Site Conservation Objectives for South Pennine Moors Phase 2 Special Protection Area Site Code: UK9007022*. Found at: <https://publications.naturalengland.org.uk/publication/4885083764817920>

⁵⁸ Natural England (2014) *Site Improvement Plan: South Pennine Moors (SIP225)*. Found at: <https://publications.naturalengland.org.uk/publication/5412834661892096>

⁵⁹ Natural England (2014) *European Site Conservation Objectives for South Pennine Moors Phase 2 Special Protection Area Site Code: UK9007022*. Found at: <https://publications.naturalengland.org.uk/publication/4885083764817920>

⁶⁰ Natural England (2014) *European Site Conservation Objectives for South Pennine Moors Phase 2 Special Protection Area Site Code: UK9007022*. Found at: <https://publications.naturalengland.org.uk/publication/4885083764817920>

These conclusions are not consistent with the status of both species being SPA qualifying features, despite the numbers recorded within the PEIR Boundary far exceeding 1% of the cited estimated SPA breeding populations. For the Applicant to have assessed the feature value and sensitivity of these two SPA features outside of the context of the SPA represents a worrying diversion from the assessment criteria set out within the PEIR.

YWT also express concern as to the likely level of impact the proposals will cause. *Samson et al.* found up to 79% fewer golden plover within 400m of active wind turbines⁶¹, with this species being highly sensitive to human presence and construction-type disturbance. This is of particular consequence during the breeding season, where birds will be reluctant to settle and will likely experience repeated flushing, impacting upon the species' ability to breed. Nature Scot's guidance⁶² further highlights the sensitivity of both golden plover and merlin, with development buffers of up to 500m being recommended for both species during the breeding season.

3.2- SPA Assemblage Species (included under the citation of the SPA)

Across the survey period, eleven of the twelve species listed within the cited SPA assemblage were found to be breeding within the survey area, highlighting the importance of the PEIR Boundary in supporting an internationally important breeding bird assemblage.

The latest Keystone survey in 2014 identified 456 breeding pairs of curlew⁶³ within the SPA. The Applicant recorded 44 breeding pairs of curlew (9.6% of the SPA breeding population) within the PEIR Boundary, again representing a significant proportion of the overall SPA population for this species. Declines in curlew of up to 40% during construction within 500m of turbines have been reported⁶⁴, with these numbers not recovering during operation. Given curlew's strong site faithful nature and high sensitivity to human disturbance, habitat fragmentation and degradation, the development will likely result in significant losses of this species from within the PEIR Boundary and beyond, which YWT deem to be unacceptable.

The PEIR has made no reference to "*The status of UK SPAs in the 2000s: the Third Network Review (Phase 2) summary of advice and options*" report⁶⁵, as published by the Joint Nature Conservation Committee (JNCC). This report advises that curlew be added to the South Pennine Moors Phase 2 SPA citation as an individual qualifier (the same classification as both golden plover and merlin), due to the significance of this species' breeding population within the SPA. The report states that:

"[...]breeding Curlew are rapidly declining across their biogeographic range and require urgent conservation measures in the UK, which has particular international responsibility for the species."

An International Single Species Action Plan (ISSAP) has also been developed for curlew by the Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA) and includes the relevant objective:

⁶¹ Sansom, A., Pearce-Higgins, J. W. & Douglas, D. J. T. (2016) *Negative impact of wind energy development on a breeding shorebird assessed with a BACI study design*. Ibis 158, 541–555

⁶² Goodship, N.M. and Furness, R.W. (MacArthur Green) (2022) *NatureScot Research Report 1283 - Disturbance Distances Review: An updated literature review of disturbance distances of selected bird species*. Nature Scot. Found at: <https://www.nature.scot/doc/naturescot-research-report-1283-disturbance-distances-review-updated-literature-review-disturbance>

⁶³ Keystone (2014) South Pennine Moors SSSI/SPA, Phase2: Breeding Bird Surveys 2014.

⁶⁴ Pearce-Higgins, J. W., Stephen, L., Douse, A. & Langston, R. H. W. (2012) *Greater impacts of wind farms on bird populations during construction than subsequent operation: results of a multi-site and multi-species analysis*. Journal of Applied Ecology 49, 386–394

⁶⁵ Grady, S. Anthony, S. Cohen, S. Douse, A. Lindley, P. Mountford, E. & Owens, R. (2025) *The status of UK SPAs in the 2000s: the Third Network Review (Phase 2) summary of advice and options*. JNCC. Found at: <https://data.jncc.gov.uk/data/5b816ab9-4268-4c48-bdc5-5241e4464d4b/third-uk-spa-review-phase-2-report-2025.pdf>

“Important breeding sites for Curlew are appropriately protected and managed.”

It is therefore reasonable to consider that the breeding curlew population within the PEIR boundary should be considered of *greater* conservation importance in the context of what is currently detailed within the SSSI citation (i.e. national importance); as such, YWT strongly disagrees with the Applicant’s assessment that the breeding population of curlew within the PEIR Boundary is of regional importance.

The JNCC’s third SPA review report also recommends the addition of breeding ring-ouzel and twite to the SPA citations as individual qualifying features, with breeding dunlin, short-eared owl and peregrine being recommended within the second UK-wide review of the UK’s terrestrial SPA network⁶⁶, published by the JNCC in 2001.

YWT are therefore of the belief that curlew, ring ouzel, twite, dunlin, short-eared owl, and peregrine must also be treated as individual qualifying features of the South Pennine Moors SPA within the PEIR, under the recommendations of the JNCC. A failure to do so risks further impacts upon multiple species recognised as meeting the SPA qualification guidelines at this site and risks future applications of Regulation 65 of the Habitats Regulations⁶⁷.

A peak of 6 breeding pairs of short-eared owl was recorded across the survey area, with 4 of these pairs being located within the turbine area (9.9.56). The PEIR states the proposals could lead to impacts upon 13% of the national population (9.9.57) of breeding short-eared owl; a significant impact YWT deem to be unacceptable, particularly in the context of this species also being considered as an SPA individual qualifying feature, as per the JNCC’s recommendations.

3.3- Birds of Prey

Hen harrier is a Schedule 1, Annex I and S41 species of national importance. One confirmed breeding pair was recorded within the Turbine Area in 2025 and repeated courtship activity in the same heather-dominated area in 2022; as such the PEIR Boundary has been shown to support c.2% (9.9.63) of the national breeding population. Other, field-based evidence has also confirmed the presence of a well-used winter roost to the south-east of the Turbine Area, supporting up to 11 individuals on occasion, making it one of the most significant winter roosts in England and representing a nationally important population of this species (9.9.65).

Findings from the WINDHARRIER project⁶⁸ revealed that the proximity to wind turbines decreases hen harrier breeding success by reducing both the proportion of successful nests (<1km = 33% success, >1km=56% success) and the number of chicks per nesting attempt (<1km=0.78, >1km 1.23-1.55). Total bird densities have also been found to be 0.3-1.3 birds/ha lower at wind farm sites compared to reference areas⁶⁹, the larger impacts being associated with larger wind farms/turbines. The highest number of wind turbines across the 6 study sites was 25, so the proposed 34 turbines within the PEIR Boundary would likely result in greater impacts than those described above on a nationally important population of this species; a significant impact YWT deem to be unacceptable.

⁶⁶ D.A. Stroud, D. Chambers, S. Cook, N. Buxton, B. Fraser, P. Clement, P. Lewis, I. McLean, H. Baker & S. Whitehead (2001) *The UK SPA network: its scope and content (Volume 2 – Species accounts)*. JNCC. ISBN 1 86107 530 8. Found at: <https://data.jncc.gov.uk/data/3634580a-cabc-4218-872f-8660a1760ad8/uk-spa-vol2-web.pdf>

⁶⁷ *The Conservation of Habitats and Species Regulations 2017* (as amended) Found at: <https://www.legislation.gov.uk/uksi/2017/1012/regulation/65>

⁶⁸ Fernández-Bellon, D., Wilson, M. W., Irwin, S. & O’Halloran, J. (2015) *WINDHARRIER: The interactions between Hen Harriers and wind turbines*. School of Biological, Earth & Environmental Sciences, University College Cork. Found at: <https://www.ucc.ie/en/media/research/planforbio/forestecology/WINDHARRIERFinalProjectReport.pdf>

⁶⁹ Fernández-Bellon, D., Wilson, M. W., Irwin, S. & O’Halloran, J. (2019) *Effects of development of wind energy and associated changes in land use on bird densities in upland areas*. *Conservation Biology* 33, 413–422

3.4- Ornithological Survey Effort

It is important to note that YWT were not provided access to review the Ornithology Data Document, as such, we have not been able to scrutinise Appendix 09-2 as part of this PEIR review.

Whilst breeding bird surveys (BBS) and non-breeding bird surveys (NBS) have been conducted within the Turbine Area, results from only 3 BBS within the Access Route have been presented within the PEIR, all conducted in 2025. No BBS or NBS have been carried out within the Bradford West Cable Corridor. Paragraph 3.4.20 of Appendix 09-1 refers to transects being carried out to supplement results of the Vantage Point (VP) NBS. However, no non-breeding transects have been carried out in September and only one in October across the 3 years' worth of NBS, highlighting a lack of survey effort within this key passage NBS window.

Months in which vantage point NBS were carried out have not been disclosed within Table 3 of Appendix 9-1, so the distribution of vantage point NBS within the passage and winter periods is not clear; YWT request further clarification on this matter. Between October 2022 and March 2024, October and November were only subject to 1 transect NBS each, both in 2022; this demonstrates a lack of survey effort for these key late-passage / early-winter survey periods. Whilst further transect NBS transects were undertaken between November 2025 and February 2026, the results of these surveys have not been presented within the PEIR.

This potential lack of overall NBS effort within September and October is a major concern with regards to assessing impacts of the scheme on birds either utilising the Site's habitats during the passage period or flying over the Site whilst migrating, as the overall NBS results may undervalue the importance of the PEIR Boundary in supporting key passage species.

Although YWT understand the practical requirements of transect routes following existing roads when conducting nocturnal transect surveys (3.4.30 of App 09-1), this is likely to result in large amounts of the survey area being unassessed and therefore multiple birds being unaccounted for, due to both the habitats present and topography of the survey area. This presents a particular concern with regards to recording numbers of golden plover within the PEIR Boundary.

In addition, paragraph 3.4.31 of Appendix 09-1 demonstrates a lack of nocturnal transect survey effort for targeting species that exhibit crepuscular activity, notably breeding golden plover. From February 2024 to July 2025, only 6 nocturnal transects were conducted, with no surveys being completed in May across both years. Paragraph 3.4.33 explains that acoustic monitoring was undertaken in 2024 to supplement these nocturnal transect surveys. However, these detectors could not be deployed during April and May 2024 (3.4.35 of App 09-1), resulting in a three-month gap in nocturnal acoustic survey data in 2024, from 22 March to 27 June, and further contributing to the concerning absence of BBS data for May, with 3rd April-6th June considered peak nesting time for golden plover⁷⁰.

Paragraphs 3.6.1 and 3.6.2 of Appendix 09-1 both refer to a four-year survey programme. However, the Applicant's survey effort demonstrates clear temporal and spatial gaps in the data collection process, demonstrating 4-years' worth of bird survey data has not been collected to suitably inform the PEIR. YWT also express concern that throughout the ornithology chapter, the Applicant references the 2010 Yorkshire Bird Report⁷¹ when assessing the overall importance of the

⁷⁰ Golden Plover (2026) Found at: <https://www.bto.org/learn/about-birds/birdfacts/golden-plover> (Accessed: 08.06.2026)

⁷¹ Yorkshire Naturalist Union (2010) Yorkshire Bird Report 2010. Found at: <https://www.birdguides.com/reviews/yorkshire-bird-report-2010/>

populations of species recorded. The latest version of this document is the 2018/19 report⁷², demonstrating that the Applicant is not using the most up to date available literature as part of their assessment. As such, there is the potential for numerous conclusions to be misinformed within the PEIR.

3.5- Working Methods

The Applicant proposes to undertake works during the recognised breeding bird season, restricting bird protection to that required by the Wildlife and Countryside Act 1981 (as amended)⁷³. As such, non-Schedule 1 species will remain prone to disturbance. This includes bird species listed within both the SPA and SSSI citations, of which the majority are highly sensitive to human presence and construction activities, even at great distances. Given the size of the proposed site and duration of the construction period (approximately 30 months) any measures to attempt to survey/protect breeding birds during the breeding season is likely to result in further, unnecessary disturbance. Any negative effects from construction during this time are avoidable and therefore not acceptable. YWT strongly recommend that construction activities do not take place during the breeding bird season.

3.6- Ornithology Conclusions

The Applicant's survey results confirm that the proposed development will be negatively impacting upon breeding bird populations/assemblages of both national and international importance. The numerous limitations present within the overall ornithological survey effort and the use of outdated literature suggest that the Applicant has not accurately characterised the ornithological baseline within the PEIR Boundary; as such the PEIR likely undervalues the ornithological value of the Site. The Applicant's limited assessment of the importance of the breeding populations of breeding bird species in the context of the SPA/SSSI is deeply concerning, as the applicant has repeatedly underestimated the scale and significance of the likely impacts.

The information provided within this PEIR chapter directly contravenes the conservation objectives for the SPA, and by extension the SSSI, with the proposed development likely resulting in increased, unprecedented adverse impacts to internationally important breeding species and the overall SPA/SSSI assemblages.

⁷² Yorkshire Naturalist Union (2019) Yorkshire Bird Report 2019. Found at: <https://records.ynu.org.uk/about-the-ynu/publications>

⁷³ Wildlife and Countryside Act 1981. Found at: <https://www.legislation.gov.uk/ukpga/1981/69/contents> (Accessed: 08.06.2026)

4.0- Hydrology, Hydrogeology, Geology and Peat (Chapter 10)

Although included in the same chapter of the PEIR, hydrology and peat have been compartmentalised and there seems to be no acknowledgement that peat is in fact hydrology. A more holistic assessment is required⁷⁴ if the effects of compression on peat on site-watercourses, amongst other relevant factors, are to be fully understood.

4.1- Flood Risk

The Flood Risk Assessment (FRA)⁷⁵ assesses only the risk of flooding within the PEIR Boundary; ignoring the very real concerns of the populace in the valley below. Assessment of the flood risks to Hebden Bridge – the inhabitants of which are understandably concerned by flooding⁷⁶ since the devastating floods that have occurred since 2011 – is delayed for the ES, which we view an unacceptable omission. Of greatest concern for Site hydrology is the proposed network of cut and fill stone tracks and floating tracks. As observed above and in our response to the EIA scoping report, peat and hydrology are inseparable⁷⁷; disruption to hydrology is disruption to peat and *vice versa*. Construction of stone tracks have been found to have a damming effect, with North American studies (Williams-Mounsey. 2012) highlighting flooding occurring upslope and drying on the downslope. Culverts can attenuate some of the effects of the tracks, but they may also focus flow potentially leading to incision and even gullying⁷⁸. If ditch drainage is used alongside some tracks to alleviate damming effects and reduce overland flow, there is a possibility of increased macropore and pipe formations because of desiccation, leading to gully formation over time⁷⁹.

4.2- Floating Tracks

Although floating tracks necessitate neither peat extraction nor drainage ditches, they compress the peat. Over time, as the track subsides due to peat compression, it is top dressed in stone to create an even running surface. The increased weight of the track materials, weight of the vehicles using the track and further compression of the peat can cause a floating track to sink to the peat profile's base. This means that they effectively behave as an excavated track, which may compromise the integrity of mitigation infrastructure such as drainage pipes⁸⁰.

A Canadian study reveals two further effects associated with peatland tracks. Depending on the aggregate used, road dust can raise the pH of the peat along the road edges⁸¹. As well as directly affecting the acidic peat, this, in tandem with nutrient enrichment, can allow scrubby, non-bog vegetation to establish, further disrupting hydrology⁸². Additionally, a German study found that where a road impeded water flow, there was a change in vegetation, and ultimately a rapid succession by coniferous trees after a period of drought⁸³.

⁷⁴ Wawrzyczek et al (2018) *The ecosystem approach in ecological impact assessment: Lessons learned from windfarm developments on peatlands in Scotland*, Environmental Impact Assessment Review 72. Volume 72. Pages 157-165

⁷⁵ Calderdale Energy Park LTD (2026) Preliminary Ecological Investigation Report: Appendix 10-9: Preliminary Flood Risk Assessment

⁷⁶ Environment Agency (2025) *Hebden Bridge Flood Alleviation Scheme Planning Design and Access Statement*. p. 11. Found at: <https://docs.planning.org.uk/20250918/73/T2GTFGDWMQ700/xzshgrnw0jyss67r.pdf>

⁷⁷ Price et al (2016) *Peatland restoration and hydrology*, Cambridge University Press: Summary.

⁷⁸ Williams-Mounsey et al (2021) *A review of the effects of vehicular access roads on peatland ecohydrological processes*, Earth science reviews; p. 214.

⁷⁹ Holden et al (2025) *Impact of land drainage on peatland hydrology*. *Journal of Environmental Quality*. 2006;35:1764–1778.

⁸⁰ IUCN (2025) *Networks of change: Tracks and roads on peatlands*; p. 9.

⁸¹ Li et al (2023) *Effects of road dust on vegetation composition and surface chemistry of three ombrotrophic peatlands in eastern Canada*, *Geoderma*;439:116665.

⁸² Li et al (2023) *Effects of road dust on vegetation composition and surface chemistry of three ombrotrophic peatlands in eastern Canada*, *Geoderma*;439:116665.

⁸³ Sengbusch, P.V. (2015) *Enhanced sensitivity of a mountain bog to climate change as a delayed effect of road construction*. *Mires and Peat*;15(6):1–18.

These multiple factors risk disruption of the hydrology within the peat and therefore risk disruption of the peat itself. Furthermore, as the tracks (and indeed the turbine bases) will remain in situ after decommissioning, they will disrupt the hydrology within the peat forever.

4.3- Peat Treatment and Definition

The Applicant proposes:

“10.8.64: 387,057 m³ of peat will be permanently removed from the infrastructure footprint, stored and then reused elsewhere [...] 172,588 m³ of peat will be temporarily removed from the infrastructure footprint, stored locally and fully reinstated at the point of excavation post-construction.”

It is not clear in the Applicant’s reporting over what timescale this peat will be stored. During the construction of an onshore gas terminal in the Shetland Islands in 2010, 672,000 m³ of peat was extracted and put into storage pending reuse in restoration. A decade later, it was found that the qualities of the peat in storage were different to that of nearby blanket bog⁸⁴. A study of the process concluded that:

“[...] changes made to the peat condition in combination with other barriers such as climate change mean that blanket bog habitat cannot be restored to the site in any meaningful time period, meaning that it has been permanently lost in a time of biodiversity and climate crisis.”⁸⁵

As already discussed, blanket bog is an irreplaceable habitat. Further to that point, attention should again be drawn to NE’s guidance on Definition of Favourable Conservation Status for Heathland. It is noted that the Applicant proposes avoiding areas of deep peat and confining works to areas of shallow peat or heathland wherever possible. NE’s guidance is very clear that:

“[where dry heath communities] occur on deep peat, the habitat should be treated as a degraded form of mire rather than as heathland. Similarly, any M15 or M16 wet heath occurring on deep peat (greater than 30 cm in depth) should also be considered as either degraded fen or bog.”⁸⁶

From this we infer that the area of irreplaceable habitat (blanket bog) might be larger than reported. One of the reuses for excavated peat is gully restoration. Gullies are erosive channels often resulting from anthropogenic drainage channels. From our experience bringing 52,000 ha of upland peatland under restoration management⁸⁷, only gullies on the shallowest gradients and with the slowest flows can be blocked with peat. In a steep or fast flowing gully, we would expect to use timber or stone sediment traps depending on conditions in the gully bottom. In a 4 m wide gully, we would be installing stone or timber baffles, again depending on gully⁸⁸ conditions. The proposal implies a lack of understanding of peatland restoration techniques and calls into question many of the assumptions underpinning this development. Inevitably, the final design of the restoration plan will be detailed in the ES.

4.4- Fire Risk

Cable installation is proposed alongside the tracks. In minimising the amount of peat that is extracted – although we’d like to see no peat extracted – we understand the rationale. It does however add to

⁸⁴ Detrey, I.(2022) *Bog in a Box: Is Long Term Peat Storage for Future Restoration Viable?* Environmental Research Institute. Found at: <https://pure.uhi.ac.uk/en/studentTheses/bog-in-a-box/>

⁸⁵ Detrey, I.(2022) *Bog in a Box: Is Long Term Peat Storage for Future Restoration Viable?* Environmental Research Institute. Found at: <https://pure.uhi.ac.uk/en/studentTheses/bog-in-a-box/>

⁸⁶ McCullagh et al. (2025) *Definition of Favourable Conservation Status for Heathland*, Natural England; p. 10

⁸⁷ Yorkshire Peat Partnership (2025) *Yorkshire Peat Partnership Annual Report 2024 – 2025*, p.3. Found at: https://www.yppartnership.org.uk/sites/default/files/2026-02/260107%20YPP%20Report_2025%20JL_V3.pdf

⁸⁸ Our restoration Yorkshire Peat Partnership (2025) Found at: <https://www.yppartnership.org.uk/our-restoration>

the hydrological disruption already discussed in that it may compound the compartmentalisation of the peat initiated by track installation. Furthermore, thermal impacts have yet to be addressed (pending the ES). Given the potential terrible impacts of fire on peatland – one fire in the Flow Country doubled Scotland’s carbon emissions in 6 days⁸⁹ – we must question what measures are being taken to ensure that thermal impacts do not lead to peat desiccation, thus increasing its vulnerability to ignition?

4.5- Monitoring

The Applicant proposes monitoring on specific areas of the peatland across specific timeframes: around the peat storage areas and on restoration works for 5 years after construction has finished. We view this as inadequate for peatland disruption at this scale. We would expect to see monitoring across the PEIR Boundary to assess whether buffer zones are adequate and construction and operation are affecting the whole peatland. Restoration is an iterative and long-term process and, should the development proceed, we would expect monitoring to continue after decommissioning to assess whether further restoration is necessary.

4.6- Peat and Hydrology Conclusions

The assessment presented in the PEIR fails to adequately recognise the intrinsic link between hydrology and peat, resulting in a fragmented and incomplete evaluation of environmental impacts. Risks associated are either underestimated or deferred to the ES, leaving significant uncertainty around downstream flood risk, and ecosystem stability. The proposed mitigation and restoration strategies are insufficiently evidenced and inconsistent with established peatland management practice. Combined with the lack of Condition Assessment for both peat and blanket bog within the PEIR Boundary and the Access and Cable Corridor Routes; we view these impacts are entirely underestimated. Currently, regardless of whether the Applicant carries out due diligence, we do not view that any appropriate solutions can be proposed in the ES given the baseline quality of this PEIR.

⁸⁹ Huge Flow Country wildfire 'doubled Scotland's emissions' (2019) BBC Scotland. Found at: <https://www.bbc.co.uk/news/uk-scotland-50435811> (Accessed: 23/04/26)

5.0- Climate Change and Carbon (Chapter 11)

5.1 Peat Excavation

The Applicant asserts that the total volume of peat to be excavated during construction of the project would be 559,645 m³ and that the carbon content of that peat would be 40 kg m⁻³. A study across a range of Scottish windfarms on peatland⁹⁰, gives an expected minimum average excavation volume of 268,796 m³ *per turbine*. The average per turbine figure includes excavation for other infrastructure such as tracks. This development proposes a minimum of 34 turbines, which would raise the peat excavation volume to 9,139,064 m³. Using a carbon content figure for degraded peat of 61 kg m⁻³¹⁹¹ and C to CO₂ conversion of 3.67 presents an alarming 2062686.5 tonnes of CO₂ at risk of disruption.

It is probable that part of the variance in peat volume excavation is due to the generally deeper peat and longer access roads on Scottish peatlands. The discrepancy nonetheless questions many underlying assumptions especially as studies have shown it is often the case that more peat is excavated than is expected⁹². A further issue with the underlying assumptions is reliance on Scottish Parliament best practice, admittedly in the absence of guidelines for England. The Scottish carbon calculator that has been used by the Applicant is currently subject to review because⁹³ of the following reasons:

- The ‘payback time and CO₂ emissions’ are not relevant/consistent with the findings of the technical assessment and literature review. It is important to consider whether emissions due to turbine life and back up are required, given new planning policy and the applicability of whole lifecycle carbon assessments.
- For all peat-related areas of the Carbon Calculator, as well as the forestry area, accuracy is lacking in one or more methodologies, use of emission factors and assumptions.
- While some data are accessible to users, it is not clear if they are able to accurately obtain some of that data – in particular, for variables that drive the results (the water table depth and extent of drainage), which could affect the accuracy of outputs.⁹⁴

Taking the Applicant’s figures at face value, if the expected carbon value is to be realised then the borrow pit reinstatement must follow best practice⁹⁵ and the peat excavation must not exceed expectations without some contingency planning in place. Where peat is used around turbine bases or crane pads, there is a high risk of carbon loss as this infrastructure incorporates drainage that risks impacting the reused peat⁹⁶. As noted in Chapter 10, cut and fill tracks present a considerable risk of changes in hydrology, pH and vegetation community, which can lead to peat oxidation⁹⁷.

5.2 Peat Condition

Whether peat will be suitable for reuse in restoration is dependent on its condition (and there will be a mosaic of different conditions on site); if the site is already degraded, reused peat therefrom is unlikely to restore habitat⁹⁸. Has the peat been subject of a condition survey to assess whether it is suitable for use in restoration? The Applicant proposes that 387,057 m³ of peat will be permanently

⁹⁰ Crotty et al (2010) *Reuse of excavated peat on wind farm development sites*, Climate Xchange; p. 22

⁹¹ Lindsay (2010) *Peatbogs and carbon: a critical synthesis to inform policy development in oceanic peat bog conservation and restoration in the context of climate change*, University of East London, p. 61

⁹² Crotty et al, *Reuse of excavated peat on wind farm development sites*, Climate Xchange; p. 2

⁹³ Maynard et al (2010) *Carbon Calculator for wind farms on Scottish peatlands: an evidence assessment*, AECOM, July 2024, pp. 1-2

⁹⁴ Maynard et al (2010) *Carbon Calculator for wind farms on Scottish peatlands: an evidence assessment*, AECOM; pg. 1-2

⁹⁵ Crotty et al (2010) *Reuse of excavated peat on wind farm development sites*, Climate Xchange, p. 5

⁹⁶ Crotty et al (2010) *Reuse of excavated peat on wind farm development sites*, Climate Xchange, p. 6

⁹⁷ Li et al (2023) *Effects of road dust on vegetation composition and surface chemistry of three ombrotrophic peatlands in eastern Canada*, *Geoderma*, 439:116665

⁹⁸ Crotty et al (2010) *Reuse of excavated peat on wind farm development sites*, Climate Xchange; p. 38

removed from the infrastructure footprint, stored and then reused elsewhere. In the Climate Xchange study, no stakeholders had participated in or knew of examples of this happening because of⁹⁹: Costs; Likely loss of peat structure / liquification during transport; Environmental impacts of transport and the Likelihood that carbon would be lost from peat in the new use and lack of control over this.

A Scottish study shows that in the best-case scenario the opportunity carbon costs of wind farms in peatland are comparable to the life cycle emissions of combined cycle gas turbines with carbon capture and storage¹⁰⁰. Again, Scottish peatlands are generally deeper and in better condition but it once more calls into question underlying assumptions. Furthermore, the same study shows that the land use cost of electricity production on peatland is on average 560 gCO₂ kWh⁻¹, the worst case scenarios indicate up to 1,760 gCO₂ kWh⁻¹. On arable land it is 45 gCO₂ kWh⁻¹; only 40 gCO₂ kWh⁻¹ on pasture¹⁰¹; even on forest it would be only 128 gCO₂ kWh⁻¹. The same Scottish peatland caveats apply but this begs the question that if a windfarm can be built on pasture at a fraction of the peatland carbon cost, why build it on peatland where multiple other environmental and ecological costs will also apply?

5.3- Climate Change and Carbon Conclusions

The Applicant's assessment of peat excavation and carbon loss raises significant concerns about the validity of assumptions and the potential climate impacts of the proposed development. The considerable discrepancy in estimated peat loss volumes, combined with uncertainties in the carbon calculator methodology, suggests that the true scale of carbon emissions may be underestimated. Additionally, the risks associated with peat disturbance, reuse, and changes to Site hydrology further undermine confidence that carbon losses can be effectively mitigated. When considered alongside evidence that alternative land uses present substantially lower carbon costs, the justification for siting the development on peatland is increasingly weak. Taken together, these factors indicate a need for more robust analysis before the project can be considered environmentally viable.

We hope that you have found these comments useful, thank you for consulting YWT.
Kind regards,

The Planning Team

Yorkshire Wildlife Trust
planning@ywt.org.uk

⁹⁹ Crotty et al (2010) *Reuse of excavated peat on wind farm development sites*, Climate Xchange; p. 65

¹⁰⁰ Albanito et al (2022) *Quantifying the land-based opportunity carbon costs of onshore wind farms*, Journal of Cleaner Production, volume 363, 132480, 4.1

¹⁰¹ Albanito et al (2022), *Quantifying the land-based opportunity carbon costs of onshore wind farms*, Journal of Cleaner Production, volume 363, 132480, figure 3