

WADSWORTH PARISH COUNCIL

WADSWORTH PARISH COUNCIL RESPONSE TO CALDERDALE ENERGY PARK'S STATUTORY CONSULTATION (PINS Reference: EN0110023, April 2026) **ADDENDUM**

4th July 2026

The addendum to Wadsworth Parish Council's response to Calderdale Energy Park's Statutory Consultation responds to inadequacies in the Preliminary Environmental Information Report's sections on Materials and Waste and Transport and Access. They became clear during the Joint Parishes Forum meeting with Calderdale Energy Park (CEP) held in Colne on Monday 29th June,

It is written by;

Penny Bennett (Upper Calderdale Wildlife Network)

Stuart Bradshaw (geotechnical engineer and former Wadsworth Parish Councillor)

Cllr Jenny Shepherd (Wadsworth Parish Council)

Foreword by Jon Kimber, Chair of Wadsworth Parish Council

This Addendum, focussing on Materials, Traffic and Transport, has been written following the Joint Parishes Forum meeting with Calderdale Energy Park (CEP) held in Colne on Monday 29th June, which I chaired. The main agenda item was Transport and Access.

In the course of the meeting, it became clear that there are inadequacies within the Preliminary Environmental Information Report's Materials and Waste, and Transport and Access assessments. The Pell Frischmann consultants were unable to explain them. Calderdale Energy Park Project Team members who were attending virtually did not offer any clarification.

These unexplained inadequacies are the subject of this Addendum to Wadsworth Parish Council's 7th June 2026 Response to CEP's Statutory Consultation. We feel that this further example of the incompetence and lack of attention to detail associated with the preparation of the CEP statutory consultation should not pass without Wadsworth Parish Council's formal comment.

Wadsworth Parish Council's 7th June 2026 Response to CEP's Statutory Consultation does not include traffic and transport, due to lack of time when working to the 10th June deadline - since extended to 8th July because CEP published an incorrect email address to send responses to.

MATERIALS AND WASTE/TRANSPORT AND ACCESS

1. Inconsistency about quantities of aggregate to be imported to the proposed windfarm site

Calderdale Energy Park's Preliminary Environmental Information Report presents varying quantities for the import of aggregate to the site. The inconsistency about imported aggregate has made it impossible to understand the proposed windfarm's construction transport impacts.

Which account is correct? The Materials/Waste Chapter 22, written by Nudge Circularity Ltd? Or Appendix 14-1 Transport Assessment, written by Pell Frischmann?

Table 22-14 of the PEIR Materials/Waste Chapter 22 gives material quantities in terms of volumes and masses but the densities they have used to calculate masses appear far too low.

For example crushed rock 195,800 m³ with a mass of 240,800 tonnes, so that is a density of 1.23 t/m³. Crushed rock for road construction arrives uncompacted in a loose state and in that state it will have a density of about 1.6 t/m³ and when compacted in place about 2.0 t/m³. This would have a significant influence on the number of vehicle trips if they use these figures.

PEIR Appendix 14-1 Transport Assessment (by Pell Frischman) makes a different assessment of material quantities at Table 6 and 7. For concrete here it mentions 4,455 tonnes per foundation base, so 151,470 tonnes for 34 bases, as against 77,000 tonnes in the Table 22-14 by Nudge Circularity Ltd.

Pell Frischmann quantifies imported aggregate as 616,000 tonnes (Table 7) against 372,700 (crushed rock+recycled aggs+sand) tonnes in Nudge Circularity Ltd's Table 22-14. Although, had Nudge Circularity Ltd used the correct density at Table 22-14, it would be 616000 tonnes Table 7 against 606000 tonnes Table 22-14.

2. Lack of clarity about potential sources of aggregate, and therefore about transport routes and traffic issues for communities.

In their Chapter 22, Table 22-13, Nudge Circularity Ltd clearly do state that the crushed rock would be non-calcareous (hardstone/granite), but there is no mention of this in Pell Frischmann's Chapter 14 and Appendix 14-1.

At the Joint Parishes Forum meeting with Calderdale Energy Park (CEP) on Monday 29th June, the Pell Frischmann Director for Transport Planning was unaware that the aggregate would have to be non-calcareous, and that this would affect which quarry/quarries would supply the aggregate.

Clearly there is a breakdown in communications here over this matter, together with the large discrepancies between the two consultants on the overall tonnages of imported aggregates. (Please see 1, above)

Since the meeting, Wadsworth Parish Councillors have been told by a geologist that there are four greywacke quarries in N Yorks that produce hard, inert stone for road surfaces that could be used on peatland. But the Pell Frischmann consultant didn't seem to know this any more than Parish Councillors did at the time.

Wadsworth Parish Council is now asking Calderdale Energy Park to clarify what North Yorkshire quarries, and what stone, Pell Frischmann are talking about.

Without this information, there is no clarity about transport routes and traffic issues for communities. (Cross ref with 3, below)

Confusion about transport routes for aggregate from North Yorkshire quarries intensified further at the Joint Parishes Forum meeting with CEP on Monday 29th June.

The Pell Frischmann Transport Planning consultant dismissed as "a non-starter" the PEIR proposal in Chapter 22, Materials and Waste, to use rail freight to bring 196,100m³ of crushed non-calcareous stone to Horton and/or Leyland rail heads, and then transfer the crushed rock to lorries for onward road transport.

Although we increasingly feel we are doing CEP's work for them, which we are obviously not happy about, we have asked Network Rail if this would be possible.

Network Rail's Freight Manager's response is that both Horton and Leyland railhead sites are owned and run by 3rd parties. Horton is a quarry which exports stone to other sites, whilst Leyland receives stone. Leyland is owned by Fox Brothers and they would be the best people to provide information. Heideleberg are the owners of Horton (and they also have Ribbleshead, which may be able to receive stone). The only other location 'could' be Hellifield. This is owned by West Coast Railways who are based at Carnforth and that might work, but any discussions would need to be with them.

3. Failure to invite potentially affected North Yorkshire Parish Councils to the Parish Forum and to include those communities in the Primary Consultation Zone

Despite the traffic impacts on North Yorkshire communities if North Yorkshire quarries are the source of the proposed wind farm's aggregate, Calderdale Energy Park has not invited affected North Yorkshire Parish Councils to the Parish Forum. The developer has defined North Yorkshire as a Secondary Consultation Zone where the only consultation methods are digital and media-led.

But on 2nd July 2026 the Craven Herald reported that parish councils in Craven are discussing the likely traffic impacts of CEP's aggregate transportation because of possible impact on the A65.

<https://www.cravenherald.co.uk/news/26246820.villages-warned-quarry-traffic-windfarm-plan-approved/>

Apparently North Yorkshire Councillors think CEP proposes to source crushed granite from quarries in Cumbria or Scotland for the aggregate required to construct the wind farm.

It is impossible to get a clear understanding of the likely aggregate transport arrangements, as they stand at this point in time. Apart from footnote 48 in Chapter 22 that refers to "hardstone/ granite quarries", Wadsworth Parish Council hasn't found any mention in the Preliminary Environmental Information Report of the source or nature of the inert non-calcareous stone that is required for the proposed wind farm construction.

We think CEP urgently needs to clarify what options it is considering for:

- Types and quantity of non-calcareous aggregate,
- Quarries that would be potential suppliers,
- Transport routes from the quarry/quarries to Junction 1 on Lancashire Moor Road/ Two Laws Road

4. Lack of local environmental capacity to justify selection of Walshaw Moor as the site for the proposed wind farm

Wadsworth Parish Council is asking the Secretary of State for Energy Security and Net Zero how Calderdale Energy Park can justify its selection of Walshaw Moor as a site for its proposed wind farm, when it lacks the local environmental capacity to enable

its development - in terms of suitable onsite aggregate for construction of road surfaces and turbine and onsite substation foundations.

The Department of Energy Security and Net Zero requires that energy infrastructure is deployed in areas with the local environmental capacity to enable those developments. (December 2025 Overarching National Policy Statement for Energy, EN-1. Para 2.5.3)

5. Failure to consider the worst-case scenario for aggregate

The worst-case scenario, which Calderdale Energy Park hasn't considered, is that the 2.1m tonnes of bulk fill which they are hoping to win on site are not accessible or appropriate. That would increase the quantity of aggregate to be imported to 2.7m tons, equating to 777 HGV journeys/day, or 1 trip every 1.30 minutes. (Calculated from the total journeys, which is 273760 divided by 16 (which is their programmed months for earthmoving) to equal 17,110 per month in place of 3850, assuming 22 days in their working month so that is 777 per day and there are 600 minutes in a working day, hence every 1.30 minutes.)

The worst-case scenario is presented in the personal response to the Statutory Consultation by geotechnical engineer Stuart Bradshaw.

In brief, there is evidence from ground investigations by Stuart Bradshaw's company and historical on site British Geological Society (BGS) boreholes that local supplies of bulk fill for the tracks may be inadequate.

Ground investigations on the valley sides in Calder Valley, from Walsden in the west to Mytholmroyd in the east, found weathered millstone grit overlying intact rock where progress was slow or not possible. The thickness of the weathered zone being just a few centimetres up to 2.0 metres. In general the weathered material has been found to make a reasonable bulk fill, it is easily dig-able, remould-able and can be easily compacted in layers. We believe in general the weathered zone thins on the valley sides towards the hilltops, although Stuart has no experience of excavations on the hilltops themselves.

On-site BGS boreholes sunk through the embankment dams to the Walshaw Dean Reservoirs in 1980 indicate the possibility that they were constructed from clay imported from afar, possibly from the Lancashire coalfield given the grey or grey brown colour (mudstone or siltstone derived), due to the inadequacy of local supplies.

Wadsworth Parish Council thinks it is essential that, in the absence of ground investigations to investigate whether local supplies of reasonable bulk fill are present on Walshaw Moor, CEP should immediately present the worst-case possibilities for their transportation strategy, in order to properly inform stakeholders in the east Lancashire towns in particular, and the North Yorkshire towns and villages too, if the intention is to import greywacke aggregate from the North Yorkshire quarries.

CEP should also calculate the worst-case effects on the volume of peat to be excavated, if the weathered materials that are suitable for bulk fill are found to be thin, resulting in much greater areas of peat to be excavated than currently published.

6. Failure to consider the economic costs to Colne of the contentious construction transport route through the town

At the 29th June Calderdale Energy Park Parish Forum meeting, there was a presentation by the BiGGAR Economics consultant on the economic benefits of the proposed wind farm on the the workforce commuting area (Calderdale, Bradford, Rossendale, Pendle and Burnley).

The BiGGAR Economics consultant claimed that the proposed windfarm's construction would create £83m Gross Value Added in the workforce commuting area (Calderdale, Bradford, Rossendale, Pendle and Burnley) and 900 local job-years. During the construction stage, local jobs would be for construction firms, quarries and aggregates (how many quarries producing appropriate aggregates are in the workforce commuting area?), accommodation and hospitality, and specialist suppliers.

The BiGGAR Economics consultant claimed that the proposed windfarm's operating and maintenance Gross Value Added would be £1.7m/year in the workforce commuting area, and 15 local jobs.

Councillor David Cockburn-Price told the Parish Forum that Calderdale Energy Park's massive traffic disruption in Colne would close town centre businesses, and they would not reopen after the wind farm construction traffic had ceased.

After the Calderdale Energy Park Parish Forum meeting, the Pell Frischmann Transport Planning consultant admitted to Colne Town Councillor David Cockburn-Price that the contentious construction transport route through Colne was "a right mess".

In response to the BiGGAR Economics presentation, Councillors also pointed out:

- The need to consider diseconomies as a result of the wind farm, as well as economic benefits.
- It doesn't make sense for BiGGAR Economics to compare Calderdale Energy Park in West Yorkshire to Scottish windfarms – the difference in geology means that Scottish windfarms have onsite access to suitable aggregate, so don't impose the same local economic costs as Calderdale Energy Park would, from having to import massive quantities of aggregate.
- Colne wouldn't benefit from accommodation and hospitality jobs as it doesn't have any hotels.

6.1 We think CEP needs to reconcile figures about GVA and employment in the PEIR Chapter 17 Socio-economics, with figures in the BiGGAR economics consultant's presentation to the Calderdale Energy Park Parish Forum meeting.

The claim in the CEP/Parish Forum meeting was £83m Gross Value Added and 900 local job-years during the wind farm construction stage in the workforce commuting area of Calderdale, Bradford, Rossendale, Pendle and Burnley.

But PEIR Chapter 17, para 17.8.16 estimates £33.4 million GVA and 340 years of employment in Calderdale, and £77.2 million GVA and 800 years of employment in Yorkshire and the Humber during the development and construction phase.

So the economic benefit in terms of GVA and jobs is claimed to be bigger in the workforce commuting area than across the whole of Yorkshire and the Humber. That would seem to suggest that there would be no economic benefit beyond Calderdale in Yorkshire and the Humber, unless we are missing something here.

6.2 CEP needs to explain how there would be nearly twice as many operational stage jobs in Calderdale for a roughly similar GVA, as there would be in the rest of the workforce commuting area.

The BiGGAR Economics consultant claimed that the proposed windfarm's operating and maintenance Gross Value Added would be £1.7m/year in the workforce commuting area, and 15 local jobs.

This compares with PEIR Chapter 17, para 17.8.35 which estimated £0.9 million GVA and 10 jobs in Calderdale. Meaning that there would be £0.8m/year GVA and 5 jobs in the rest of the workforce commuting area (Bradford, Rossendale, Pendle and Burnley).

Does this indicate that the Calderdale jobs would be lower waged than the jobs in the rest of the workforce commuting area - ie mostly accommodation and hospitality?

6.3 “Development of the offshore wind sector in Calderdale”

Calderdale Energy Park documents have become notorious for daft errors. PEIR Chapter 17 is no exception: Para 17.8.74 states “[Calderdale’s] Visitor Economy Strategy makes no referenced [sic] to the potential development of the offshore wind sector in Calderdale.” And 17.8.76: “The West Yorkshire Destination Management Plan makes no referenced to the potential development of the offshore wind sector...”

7. Lack of clarity about the Western Access “offline bypass” route east of Laneshawbridge to Lancashire Moor Road

At the Joint Parishes Forum meeting with CEP, Cllr Jenny Shepherd asked the Pell Frischmann consultant:

- Which of the PEIR’s two stated locations for the junction of the proposed Laneshawbridge offline bypass track with Lancashire Moor Road is correct?
- If the Herders Common junction is correct, why has the Preliminary Environmental Information Report omitted to schedule ornithology surveys on Herders Common, despite the fact that it is only just outside the Special Protection Area for birds, is a known breeding site for curlews; and other waders are also present?
- Since the Abnormal Indivisible Loads would be delivered at night, there would need to be night time ornithology surveys of nocturnal birds that are likely to be present on Herders Common.

The Pell Frischmann consultant didn’t have any answers.

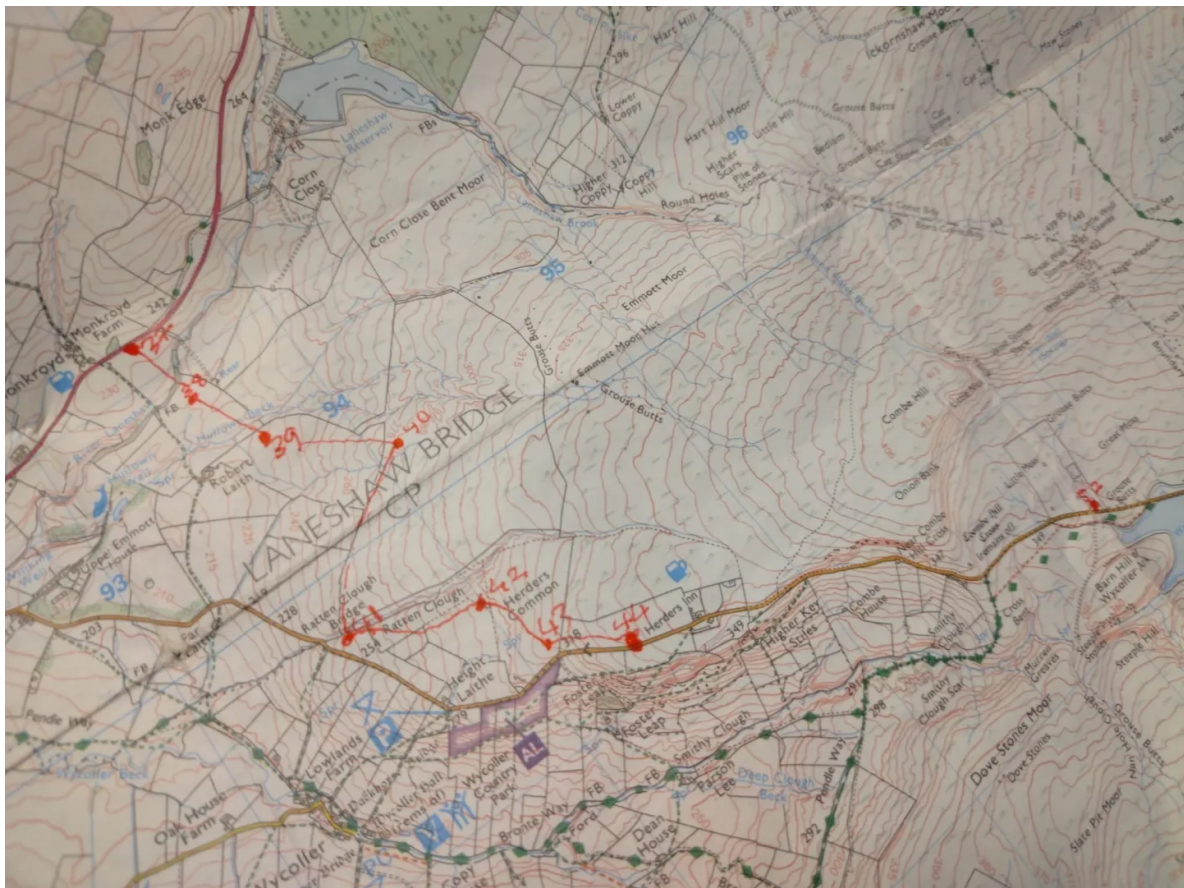
7.1 Calderdale Energy Park needs to explain why the PEIR has inconsistent versions of the offline bypass route/s.

Chapter 5, para 5.7.40 states that as part of the Western Access Route, a new offline (i.e. not within existing highways routes) AIL and HGV route has been proposed off the A6068 east of Laneshawbridge, in order to avoid potential impacts to environmental and heritage features on School Lane. A secondary offline route has been proposed as an option on Lancashire Moor Road to avoid potential pinch points identified in the swept path analysis for the AIL route. Both of these offline routes are subject to consultation with relevant landowners and stakeholders including the relevant highway authority.

Chapter 9, Ornithology (9.5.51), and Appendix 14-1, p41, say that the new offline route from the A6068 Keighley Road, across upland grassland, would join Lancashire Moor Road near Ratten Clough Bridge. Appendix B in Appendix 14-1 does show an exit to Lancashire Moor Road there. Would this exit be for HGV wagons?

Appendix 14-1, p 62-62, and Appendix A and Appendix B in Appendix 14-1 show that the offline bypass would turn away from Lancashire Moor Road near Ratten Clough Bridge, carry on across Herders Common and join Lancashire Moor Road south of Herders Common. Would this be for the Abnormal Indivisible Loads?

7.2 Calderdale Energy Park should have provided a decent map of the offline bypass route superimposed onto the OS map, so people could see where on the ground it would go and where bird and habitat surveys are needed.



Appendix 14-1, Appendix A has a map of points of interest along the proposed new offline track. The interactive version of the map is [here](#). To try and make sense of it on the ground, we roughly superimposed key points of interest onto the OS map (above). This shows the track crossing Herders Common to exit onto Lancashire Moor Road at Point 44. This should have been done in the PEIR.

7.3 If the ornithologists aren't doing their breeding surveys of the offline bypass areas now, when will they be doing them: 2027? After the Development Consent Order (if it is consented)?

These moorland fringe areas are important for curlew along this northern boundary of the South Pennines. Upper Calderdale Wildlife Network have seen them in this area.

CEP have admitted that surveys of the wider areas will be done post-DCO, but of course those are areas only indirectly affected by the works. To not survey areas that would definitely be affected by the works seems extremely cavalier. Once the offline bypass were constructed, there would be HGV wagons going in both directions every three minutes or so for prolonged periods and months of Abnormal Indivisible Load deliveries by night.

The proposed wind farm's construction period would do the greatest damage to protected breeding birds if the offline bypass route crosses breeding areas for lapwing, curlew etc. They may go and never come back to the areas where they have experienced disturbance.

Is this appropriate for a substantial engineering project? Which is what this offline section of road would be.

7.4 The AIL deliveries would be at night, so nocturnal bird surveys are needed - and Laneshawbridge people need more information too

The Pell Frischmann Specialist in Abnormal Indivisible Load Assessments said that the deliveries would be at night - but couldn't confirm if the PEIR figures for Abnormal Indivisible Load deliveries are correct: that for 5 months there would be 340 turbine deliveries/month (Table 10, Appendix 14-1).

On the basis of CEP's 6 day working week, this would be about 13 AIL/s night (except Sundays) for 5 months, by our calculation. Appendix 14.1 says it is assumed that three turbine components would be delivered per convoy, in up to 3 vehicles.

The Specialist in Abnormal Indivisible Load Assessments was unable to say if this means there would be around 4 Abnormal Indivisible Load convoys/night coming through Laneshawbridge and along the offline bypass for 5 months (except Sundays),

She was unable to provide even a vague timetable, total length of disruption or how many convoys would be involved.

This is completely unsatisfactory for the people in Laneshawbridge who need to know how many Abnormal Indivisible Load convoys per night are likely to pass their houses, and whether they are likely to disturb their sleep.

It also means that nocturnal bird surveys are needed in the offline bypass areas of farm grassland and Herders Common. If there are golden plover around, they feed at night, though their areas are on the higher parts of the moor. It's possibly just as bad whatever the time for them, and then there are the 5 species of owl...Upper Calderdale Wildlife Network say there are likely to be other waders that do twilight and dawn foraging that may be affected.