

Planning Department
West Northamptonshire Council
One Angel Square
Angel Street
Northampton
NN1 1ED

13th August 2026

Dear Sirs

2025/2767/MAF: Solar farm on Land near Yardley Gobion, West Northamptonshire, NN12 7TT

Introduction

The proposal is for the installation of a 40MW solar farm combined with associated infrastructure in 89.6 Ha (221 acres) of open countryside between Pottersbury and Yardley Gobion.

CPRE Northamptonshire assesses solar farm applications against our solar farm policy. The criteria that we use when assessing schemes weighs the following factors:

- The visibility of the scheme in the wider landscape
- Whether it harms a valued or sensitive landscape
- Whether it harms views from settlements and for users of Public Rights of Way
- Whether it harms the setting of settlements
- The level of reduction in food production.

Government and CPRE National Policy on Solar Farms

Government policy advises that LPAs should “plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries”ⁱ. It goes on to say that “Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality”. This is reflected in Local policy South Northamptonshire Local Plan (Part 2), Policy SS 2.1(h).

The CPRE national policyⁱⁱ on solar farms concludes:

CPRE is calling on the government to urgently take these strong, positive steps:

- A sequential policy, supported with investment incentives, should make commercial roofs and brownfield sites – and not greenfield sites - the clear locations of choice for solar energy;
- Reducing overall demand for energy through efficiency measures in buildings, industry and transport, should be a national priority – this is also crucial to tackling fuel poverty and creating green jobs;

- Individual and cumulative impacts on landscapes and farmland should carry substantial weight in all planning decisions;
- Greenfield solar applications must have a binding requirement to contribute to Local Nature Recovery Strategies;
- Direct financial support should be given to community energy schemes, which represent the gold standard for renewables done well.

There is a pressing need for renewable energy, but that can never be a justification for poor quality or harmful schemes. Our local CPRE groups will always speak out against harmful proposals, and there is a desperate shortage of good schemes that would enjoy their support. The government must act quickly to fix this growing problem.

The Extent of the Visual Impact

It is disappointing that there are no photomontages as we might usually expect and instead only a limited number of photographs indicating the extent of the site within existing views. However, the photographs show that there would be extensive visibility of the scheme from the viewpoints.

We note that the LVIA identifies adverse impacts but, in our opinion, it understates the impact upon those that live within and use the landscape. The LVIA reveals its propensity to under-rate the impact of the scheme when it refers to the scheme as being of “medium scale”. Whilst we concede that we are now seeing applications for gargantuan schemes, a 40MW scheme covering over 220 acres can only be considered medium scale by someone whose sensitivities have been dulled by those larger schemes.

The bare earth ZTV shows that the scheme is not contained by the local topography and so would be widely visible within the landscape over a considerable area. It should be noted that screened ZTVs cannot be relied upon because they frequently over-represent screening, particularly when assessing visibility during the winter months when much of the screening is ineffective. It must also be noted that where screening is not under the control of the applicant it cannot be relied upon to remain in place for the duration of the scheme further diminishing the reliability of screened ZTVs. Regardless, the screened ZTV still predicts visibility of the scheme over a very large area.

Sensitivity of the local landscape

The landscape currently has an unspoilt rural character that provides an important separation between the villages of Pottersbury and Yardley Gobion. There are a number of PRoWs that cross the countryside between the two villages which offer residents pleasant walks through tranquil countryside. This landscape is not capable of absorbing such a large industrialised structure which would virtually bridge the separation between the two villages.

At a local scale the landscape would be completely industrialised by the scheme.

Impact on views from Settlements and Public Rights of Way

The scheme is extremely close to both Pottersbury and Yardley Gobion and would be visible from both villages. It would either straddle or run adjacent to a number of PRoWs. The scheme would infill the majority of the space between the villages with an industrial scale development that would dominate the area, create noise and be visible from both villages. Users of the PRoWs that link the villages would have to pass through or adjacent to the scheme which would dominate their walk.

The ZTV diagrams also show that the scheme would be visible for users of the Grand Union Canal and the Grand Union Canal Walk for a significant distance.

Harm to the Setting of Settlements

The scheme is very close to and would be visible from both Pottersbury and Yardley Gobion. It would virtually link the two villages which would not meet the requirements of South Northamptonshire Local Plan Policy SS 2.1 (a) which seeks to maintain the individual identity of the villages by doing so.

The ZTV diagrams also show that neither village could be reached without passing through or by the scheme. Even where a receptor does not experience views of the scheme from their destination within a village when they arrive at their destination, they will have remembered views of the scheme. This result in the characterisation of the villages as being “by the solar farm” rather than “in the countryside”.

Impact on Food Production

NPPF paragraph 187b requires that “the economic and other benefits of the best and most versatile agricultural land” should be recognised. The scheme site comprises 26ha (35% of the site) Grade 2 land with the remaining land being Grade 3b.

Although the proposal states that the site can be returned to agricultural use after decommissioning, it is unlikely that the quality of the soil can be reinstated to its current condition. This was acknowledged at the Blackberry Lane appealⁱⁱⁱ. In effect the conclusion was that solar PV schemes result in the permanent degradation of the land upon which they are sited.

We also note that the application states that the site could potentially be used for grazing. This is a common statement in solar farm applications but it is very rare that grazing actually takes place. It is generally assumed for planning purposes that unless arrangements have been put in place by the time of the decision, that any potential for grazing should be disregarded.

In the unlikely event that the site was to be used for grazing the food value of the land would inevitably be substantially reduced when compared to arable use.

Noise and Tranquillity

The noise report assesses the noise impact at noise sensitive properties but does not assess the noise impact on the PRoWs that are used both by residents and by walkers on the Grafton Way long distance footpath.

Figure 4 of the noise report shows significant levels of noise within the site which would severely harm the tranquillity which is currently enjoyed by users of the PRoWs. When this is combined with the industrialisation of the site by the fencing and PV panels, this would inevitably act as a substantial deterrent for the PRoWs to be used for recreation and exercise with a consequential adverse impact upon the wellbeing of residents. This is contrary to Paragraph 198(b) of the NPPF^{iv}.

Cumulative Visual Impact

One area that is not assessed in the application is that of cumulative impact with other schemes. Although the ZTV diagrams show visibility of the scheme beyond 5km and the LVIA dismisses the need to consider cumulative impact because the nearest scheme lies 2.2km from the site. No other nearby schemes are listed let alone assessed for potential cumulative impact.

Sequential cumulative impact in particular can happen over a wide area especially on long distance footpaths such as the Grafton Way or on roads that pass a number of schemes.

Climate Change Considerations

As is usually the case, addressing climate change is never straightforward. It is necessary to take a holistic view of all considerations in order to make the best decisions and avoid superficially good decisions that have unintended or unforeseen adverse consequences.

The latest IPCC report leaves no doubt that predicted impacts of climate change are already being experienced and will continue to increase. The Climate Change Committee report CCRA3^v identifies our national food security as at risk from climate change. This means that not only should the world increase its efforts to reduce carbon emissions, but it is vital that the UK should take steps to increase our resilience to withstand the predicted adverse impacts of current and future changes including improving our national food security.

Britain is heavily dependent upon food imports, which makes us particularly vulnerable to any disruption in our food supply chain. The Ukraine war has brought Britain's high level of food insecurity into sharp focus and made it apparent that our heavy reliance upon food imports is of national concern. Rather than taking prime agricultural land out of production, we should be seeking to produce more of our own food and reduce our reliance upon imports.

Whilst we acknowledge that the recent Land Use Framework suggests that 9% of agricultural land can be taken out of use for other purposes without reducing food security because historically agriculture has improved efficiency at around 1% per annum. We consider that this assumption is detached from the reality because yields already being significantly reduced by the effects of climate change and government environmental policy is discouraging the use of the inputs that have enabled that very increase in efficiency. The Land Use Framework offered no evidence or argument to support its wishful thinking.

The renewable energy produced by the 40MW scheme would of course make a contribution to reducing global carbon emissions. It is, however, important to put this into context in order to be able to weigh the benefit against the disbenefits. The figures given in the application look impressive, but give a false impression of the true contribution that the scheme would make to reducing carbon emissions. We calculate that on average the scheme could result in carbon savings of just over 9,000 tonnes of CO₂ per annum which would be equivalent to the carbon footprint of just under 1,400 homes^{vi}.

This is clearly very different from the picture painted by the 18,492 homes supplied figure stated by the applicant. This large discrepancy is because the homes-supplied figure only considers the electricity currently used in homes, and disregards other fuels and all energy used outside of the home. It also disregards the expectation that the domestic consumption of electricity will increase significantly as homes move away from gas heating systems and charge electric cars at home.

A further consideration is that the output from solar schemes is heavily influenced by season. During the winter, when demand is at its peak, capacity factors drop to as low as 3% meaning that the output from the scheme would offset fewer than 380 homes.

Alternatives

An important consideration with solar PV is that unlike large-scale wind, it does not need to be located in the countryside. The UCL Energy Institute found that the whole solar PV target could be exceeded on rooftops and other spaces within the built environment^{vii}. This would obviate the need for solar farms.

It should also be noted that the output from different renewables is not interchangeable within the grid because there is a limit to the capacity of different technologies that can be successfully absorbed into the grid. Solar PV is particularly seasonal because it is reliant upon the strength of sunlight. The consequence is that it produces its high levels of output during summer days when demand is at its lowest, and produces its lowest levels of output in mid-winter when demand is highest. This makes it a very poor substitute for other renewables.

It should further be noted that there is already an excess of solar schemes with permission and that NESO are reevaluating which solar PV schemes will be offered connections to the grid. Not only do we consider that this scheme is unlikely to meet their criteria to be granted a connection, but we consider that other less harmful schemes are available.

Glint and Glare Assessment

It is very concerning that the Glint and Glare Assessment frequently relies upon proposed and new planting to prevent any impact from glint and glare. Firstly, this does not consider the reduced effectiveness of screening in winter conditions when vegetation is not in leaf and the sun is lower in the sky during waking hours. Secondly, it assumes that all screening will remain in place and be effective for the 40-year duration of the permission. Thirdly, new planting would take as long as 15 years to provide effective screening.

Where screening is under the control of the applicant, any permission should include a condition requiring that it must be maintained for the duration of the scheme. Where screening is not under control of the applicant there is no guarantee that it will remain in place and could be lost to development or disease.

Biodiversity Net Gain

Productive agricultural land necessarily has relatively low biodiversity since it is designed to support a virtual monoculture where crops are grown. This makes it easy to demonstrate an on-site net gain. However, given that there will be no lower demand for food it is inevitable that alternative land will have to be converted to agricultural use to grow the lost food production.

It is almost inevitable when the overall biodiversity change of the two sites is considered, that there will be a net loss of biodiversity.

Conclusion

This scheme does not meet the national and local policy for solar farms which seek to avoid the use of Best and Most Versatile land. Unlike many schemes, 26ha of the site is rated as being Grade 2 (very good) land which is relatively rare in the UK making it more important than usual to protect the land.

We have found that this scheme would have an adverse impact upon every criterion that we consider when assessing the acceptability of solar farm applications and as a consequence CPRE Northamptonshire feel that we must object to this proposal. We also found that this scheme does not meet national or local policy.

We consider that the benefits gained from the relatively modest level of carbon savings from this scheme do not outweigh the permanent loss of Grade 2 BMV and the other harms that would be caused by this scheme. We therefore recommend that the scheme should be refused.

Yours faithfully
For and on behalf of CPRE Northamptonshire

END NOTES

ⁱ NPPF paragraph 188:

Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁶⁵; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

⁶⁵ Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

ⁱⁱ https://www.cpre.org.uk/wp-content/uploads/2022/02/Feb-22_CPPE_Policy-statement-on-solar-energy.pdf

ⁱⁱⁱ At Blackberry Lane solar PV appeal the Inspector and the Minister concluded that: the structure of agricultural soil is fragile and easily damaged and that the construction of a development of the scale proposed is likely to result in a substantial amount of ground disturbance across the application site. This disturbance would arise from the engineering operations necessary to construct a solar park of the scale proposed and from the potential for widespread soil compaction caused by the movement and use of heavy vehicles and machinery required for the installation of the supporting posts and the excavation of trenches, access paths and foundations across the site. In my view the impact of these operations and the nature of the vehicles and equipment required are not comparable to agricultural practices and are likely to significantly damage the structure of the soil.

^{iv} Paragraph 198(b) of the NPPF states: *“identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason”*

^v Climate Change Risk Assessment – CCRA3 from the Climate Change Committee contains principles to improve the understanding of risk and enable effective adaptation to climate change, the second of which is:

2. Integrate adaptation into policies, including for Net Zero

A host of government and societal goals will be undermined by the effects of climate change, including the provision of reliable and safe supplies of food and water; infrastructure services such as transport, energy and digital; biodiversity; public health; natural and cultural heritage; and the achievement of Net Zero. A more realistic appraisal of climate risk must be embedded in the policies, investments and decisions that relate to these goals.

Integrating measures for adaptation and emissions reduction is especially important – addressing adaptation and mitigation together. In the past three years, the opportunity was missed in 11 of 15 relevant major UK Government announcements to include integrated plans to adapt to climate change alongside those for reducing emissions. Where adaptation was mentioned, it often lacked specific actions or was not viewed as necessary to meeting the goal of that particular policy. In others it was simply absent.

The best way to address climate change and to avoid unintended consequences is to ensure adaptation and mitigation are considered together in those areas where there are the major interactions: especially across policies for infrastructure, buildings and the natural environment.

^{vi} The formula that we use to calculate maximum annual carbon savings of solar schemes is:

MW installed capacity	solar PV capacity factor	days in a year	hours in a day	tonnes CO₂ per MWh	tonnes CO₂ per annum
40	11%	365	24	0.235	9,057

The formula that we use to calculate the numbers of homes offset by solar schemes is:

annual carbon saving	average carbon footprint of a home	homes offset
9,057	6.5	1,393

^{vii} Shout from the Rooftops: A Common Sense Solar Revolution,
<https://www.cpre.org.uk/resources/shout-from-the-rooftops-delivering-a-common-sense-solar-revolution/>