



The countryside charity
Northamptonshire

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By email

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2025/0018/MAF: Solar farm, Manor Farm, Whitfield

Introduction

The proposal is for a solar PV installation of 30MW in 41Ha (100 acres) of open countryside at Whitfield.

1. CPRE Northamptonshire assesses solar farm applications against our solar farm policy which is attached. 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.

2. An additional factor not included in our policy is the impact upon tranquillity because inverters and transformers can create significant noise levels. We feel that it is unacceptable that it is suggested that decommissioning can be dealt with by condition.

The Extent of the Visual Impact

3. The ZTV diagram shows that the scheme would be visible over a significant area. A significant omission from the LVIA is an assessment of the cumulative impact with the Turweston scheme on the opposite side of the Great Ouse valley. Within the wider area the cumulative impact of the Radstone scheme should also be considered. While it is unlikely that there will be intervisibility or concurrent visibility with the Radstone scheme, the concentration of solar PV schemes within a confined area would create a perception that the landscape is dominated by solar schemes thereby changing the overall landscape character.

Sensitivity of the local landscape

4. The applicant's LVIA shows the very high quality of the rural landscape which is particularly evident when assessing the impact on the PRoW that would be surrounded by the proposed scheme. In our view the impact upon this landscape would be Major/Severe.

5. Although we acknowledge that the scheme proposes an undeveloped corridor through the scheme with fencing and planting to create screening, walking through a contained corridor is in no way comparable to the value of the existing open, attractive and expansive rural landscape which is a valuable recreational resource for residents of Whitfield. It is important to note that any screening will take many years to mature to the point where it is effective and also can provide limited screening during the winter period.

Harm to the Setting of Settlements

6. The scheme virtually abuts Whitfield and would in our view have an overbearing influence upon it. We acknowledge that there is existing and proposed screening between the scheme and the village, but even where developments are not directly visible, remembered views establishes the context that shapes the sense of place within that settlement. The consequence of this is that the villages become defined as being “by the solar farm”.

Impact on Food Production

7. The site is comprised of 22Ha (54 acres) of Grade 3a land and 18.5 Ha (46 acres) of Grade 3b land. Thus, the majority of the land is Best and Most Versatile Land with the remainder being just below that category.

8. Food security is identified as one of the greatest risks to the UK from Climate Change, and certainly one that we as a nation can influence by appropriate land use decisions. Although the NPPF has recently been changed to reduce the consideration of the value of agricultural land, this does not remove the climate consideration of the importance of increasing our food security in order to mitigate against its impacts. Sadly, global emissions are still increasing and set to continue doing so for some time. This makes it inevitable that climate impacts will increase for the foreseeable future.

9. We welcome the implicit acknowledgement in the application that the food value of the land would be reduced if it was to be used for grazing, but we wish to highlight that this possibility is raised in every solar farm application that we have seen, yet we have never encountered it in practice. It is, therefore, fanciful to suggest that it would occur and no weight should be given to the suggestion.

10. The application states that the scheme would be operational for 40 years and that it could be returned to agricultural use. While this may be the case, it is likely that the land quality will be degraded as was acknowledged in the decision of the Inspector at Blackberry Lane (which was echoed in the Minister’s decision) explains:

“I am nevertheless mindful 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 and result in the loss BMV agricultural land.”

Climate Change Considerations

11. 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 adverse consequences.

12. The most recent IPCC report leaves no doubt that predicted impacts of climate change are already being experienced and will continue to increase. The Climate Change Risk Assessment report (CCRA3) to the government from the Climate Change Committee takes a wide view of the risks, one of which is food security. It contains principles to improve understanding of risk and enable effective adaptation to climate change, the second of which is:

2. Integrate adaptation into policies, including for Net Zero.

13. 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.

14. 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.

15. 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.

16. This means that not only should the world increase its efforts to reduce carbon emissions, but it is vital that we take steps to increase our resilience to withstand the predicted adverse impacts of current and future changes. One of the greatest concerns for Britain is that we are already heavily dependent upon food imports, which makes us particularly vulnerable to any disruption in our food supply chain.

17. The renewable energy produced by the 30MW scheme would of course make a contribution to reducing carbon emissions. It is, however, important to put this into context in order to be able to weigh the benefit against the disbenefits. By using a solar PV capacity factor of 10% (probably generous for this latitude) and the 2020 government figure of 0.235 tonnes CO₂ per MWh generated, we calculate the saving to be 6,175 tonnes of CO₂ which equates to the carbon footprint of around 600 homes. This is very different to “meeting the electricity demand of 11,500 homes” as claimed in the application because that figure only considers the current electricity consumed within the home which is only a fraction of the energy used in the home and, of course, homes only represent a fraction of the overall energy used in society.

18. An important consideration with solar PV is that it does not need to be located in the countryside and can be installed, albeit at a smaller scale, within the built environment thereby removing the need to sacrifice productive agricultural land which can be better used to grow food or bio-fuels or used as a carbon sink through re-wilding or tree planting. Even in the open countryside solar PV should be sited on less productive land leaving the more productive land for agricultural use.

Other Matters

19. We have previously mentioned our concern about the lack of a decommissioning report. We are further concerned about the socioeconomic impact of the scheme and the cumulative traffic impact with HS2 construction traffic.

Temporary permission and decommissioning

20. This application is for a temporary permission lasting 40 years. Whether such a long permission can be considered as temporary is in itself debatable given that such a permission will certainly extend beyond the lifetime of around half of the population.

21. It is normal for temporary permissions to include a decommissioning report that sets out how the land will be restored and returned to its previous condition and how that restoration will be funded. There is no decommissioning report meaning that this important aspect has not been considered.

22. This is particularly important for solar farms because it is no longer considered that the land used can be returned to its former condition. The Welsh Government's Technical Advice Note TAN 6 points out that the construction, maintenance and decommissioning activities would irrevocably harm the soil structure making it impossible to restore a site to its former condition.

23. At the end of its life the site would contain a large amount of industrial waste that will need to be removed and disposed of. This will be an expensive operation and the report should set out how this will be funded. Without a secured fund, the scheme could be abandoned and so it is essential that the funding mechanism should be specified and required by condition.

Socioeconomic impact

24. The scheme would take a significant amount of productive agricultural land out of use. This means that the farms from which this land is taken would have a reduced agricultural business which reduces long term local employment both directly on the farms, but also in downstream businesses that currently process the produce.

25. We are not aware of the ownership of the land, but if the scheme forms part of a tenant farm, the reduction in landholding would reduce the size of the business which would reduce the farm income and could even render the business unviable.

Cumulative traffic impact

26. We feel that it is necessary to consider the cumulative traffic impact of the construction traffic for this scheme in conjunction with the traffic generated by the HS2 construction. There is the potential for concurrent operations to overload the road network.

Conclusion

27. CPRE Northamptonshire considers that the application documentation is inadequate to fully assess the proposal. In particular we would expect an application to include:

- Cumulative Impact Assessment
- Decommissioning report
- Cumulative Traffic Impact report

28. Regardless of the content of any supplementary information, CPRE Northamptonshire feel that we must object to this proposal because from even the current information we consider this to be a proposal that cannot be accommodated in this location without significant harms.

29. We find that this scheme is proposed in a sensitive location and the relatively modest amounts of renewable energy that it would produce are insufficient to outweigh the harms that it would cause in this location.

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