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Dear Mark,

Tydd Solar, Land at Treading Field, Treading Drain, Tydd St. Giles, Cambridgeshire,
PE13 4PL; EIA Scoping Opinion Request

This letter comprises a formal scoping request prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations').

The request is submitted by Third Revolution Projects on behalf of Pathfinder Clean Energy Limited ('PACE') ('the applicant') to South Holland District Council. It relates to the proposed renewable energy development at the Land at Treading Field, Treading Drain, Tydd St. Giles, Cambridgeshire PE13 4PL. The site comprises of land within both South Holland District Council and Fenland District Council, and so a scoping request has been submitted to Fenland District Council in parallel to this request. The description of the proposed development is as follows:

"The installation of 49.9MW ground mounted solar photovoltaic panels with associated battery storage, substation and ancillary plant and infrastructure, and erection of security fencing and pole mounted CCTV cameras"

The site comprises approximately 140.5 hectares (ha) and is proposed to provide a solar energy farm with a maximum export capacity of 49.9MW to the local distribution network. A solar farm of this scale would be expected to provide sufficient electricity to power approximately 22,388 average UK homes annually, preventing 16,200 tonnes of CO₂ emissions each year.

The site has been subject to two planning applications for the proposed development (one in each LPA) and is currently the subject of two live appeals (appeal refs: 6001284 & 6001285). Although the site was initially screened negatively by both LPAs, during the course of the appeal process the Secretary of State issued a screening direction (attached in Appendix 1) which notified the appellant that the site was considered to be EIA applicable.

We therefore seek South Holland District Council's guidance on the scope of the EIA, including key matters to be assessed. The EIA will be undertaken following the methodology set out in this scoping request and will result in the production of an Environmental Statement and Non-Technical Summary in compliance with the EIA Regulations. We invite the Council's input on the proposed scope of assessment to ensure a comprehensive and robust evaluation of potential environmental effects.

In their decision, the Secretary of State noted that cumulative impacts may arise with other schemes in the area, namely Meridian Solar Farm and Treading Bank Solar Farm. The Secretary of State notes



in their direction that the use of best-and-most-versatile (BMV) land and impacts to landscape are the cause for potential impacts due to cumulative effects. The Secretary of State has advised that their direction should be used as evidence by the LPA when providing their scoping opinion to the applicant.

Site description

The site lies within the administrative areas of South Holland District Council and Fenland District Council and is located just to the east of the settlement of Sutton St. Edmund.

The site is comprised of low-lying agricultural land in arable production. The topography of the site is almost completely flat with an elevation from 0m to 3m AOD. It comprises multiple field parcels situated east of Guanockgate Drive. Elloe Bank and Lady Nunn's Old Eau run through the site. The submitted site location plan showing the extent of the proposed development is shown at Figure 1.

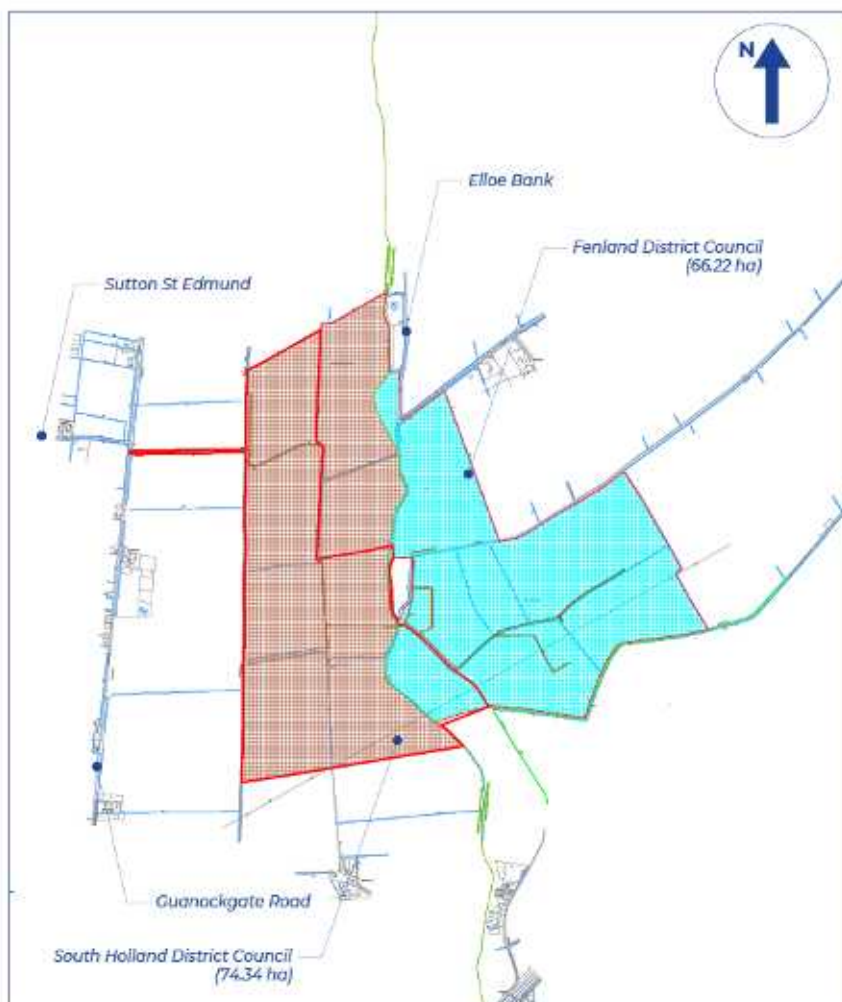


Figure 1: Site Location Plan

The surrounding area is characterised by farmland in arable production. The landscape is open, with few trees or hedges marking the boundaries between fields. Currently, the field access is gained via existing accesses off Guanockgate Road or Elloe Bank. Cambridgeshire Bridleway 238/13 bisects the



site from north to south while Lincolnshire footpaths SuSE/8/1 and Tydd/4/1 run along the existing site access.

Existing overhead electricity infrastructure is present in the vicinity of the site. Specifically, a 132kV National Grid overhead line is located within one of the southern parcels of the site and represents the point of connections for the proposed solar farm's export.

Proposed development

The proposed development comprises the construction, operation, and eventual decommissioning of a ground-mounted solar photovoltaic (PV) energy generation facility and battery energy storage system with an export capacity of 49.9MW. The scheme is located on 140.5ha of agricultural land and will be operational for a temporary period of up to 40 years.

The PV panels will be mounted on metal frames in east-west oriented rows. These will be installed with a fixed tilt design and will stand no more than 3.5m high. The layout is being carefully designed to retain existing field patterns and minimise visual impact while optimising solar gain. The proposed panel elevations can be seen below at Figure 2.

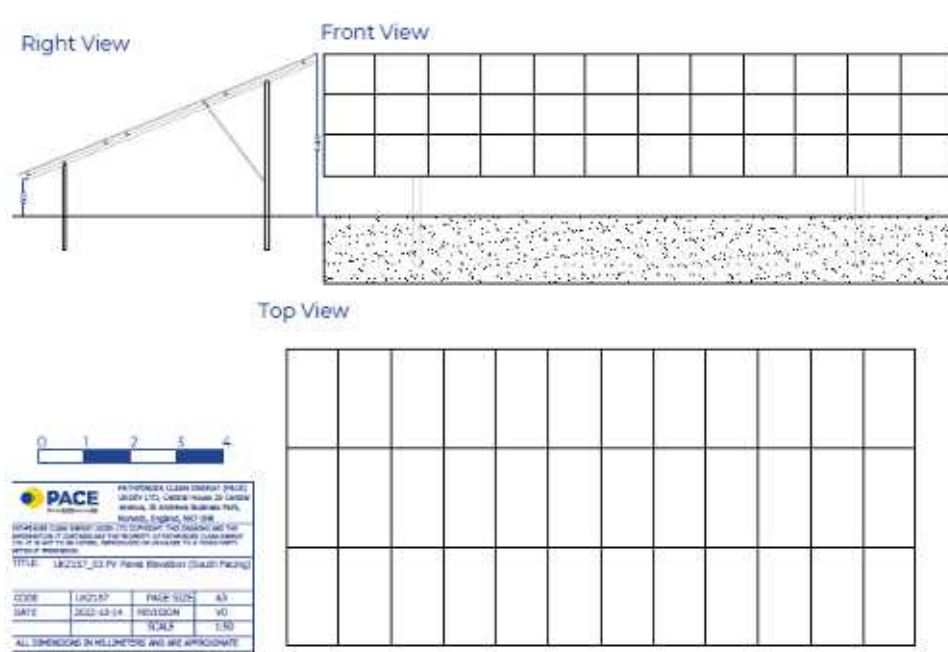


Figure 2: Proposed panel elevation

The battery energy storage component will be comprised of 43 total containers, of which 7 will be battery inverter containers and 36 will be the batteries themselves. These containers will be located within the same compound located at the centre of the site to reduce any potential noise amenity impacts to nearby residences, and has been located to the east of the existing copse so that it will not be visible from Sutton St. Edmund. The design of the containers can be seen below at Figure 3.

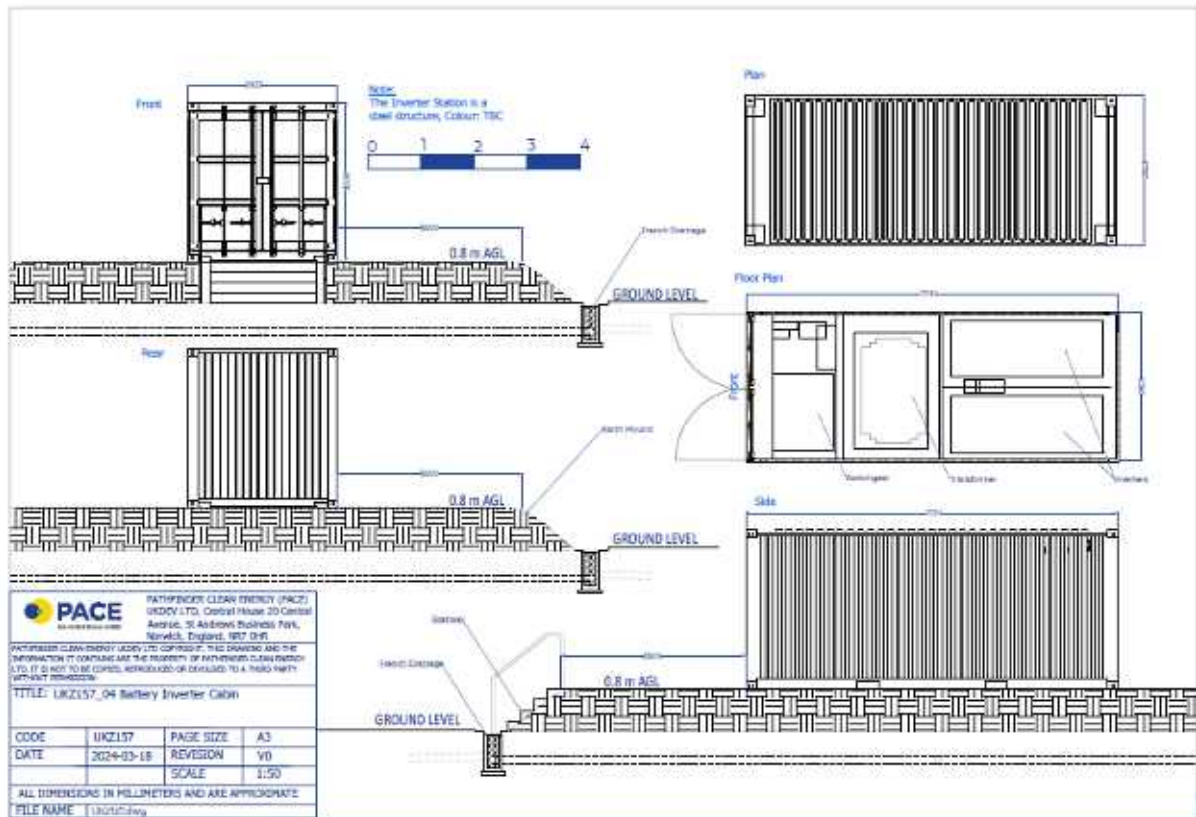


Figure 3: Proposed battery storage container elevation

The development will also incorporate the following infrastructure:

- An onsite substation compound, housing transformers, switchgear, and control equipment within buildings up to 8 metres in height;
- String inverters and step-up transformers distributed throughout the site to convert and manage generated electricity;
- Spare parts storage containers;
- Electricity generated will be exported to the grid via a tee off connection and sealing end platforms mounted to one of the onsite 132kV towers. This element will be constructed by the National Grid;
- Internal access roads with a permeable crushed-stone finish, enabling operational access across all fields while allowing natural drainage;
- Perimeter security measures including 2m deer fencing, locked access gates, and pole-mounted CCTV at strategic locations;
- Temporary construction compounds for welfare, laydown, and materials storage areas; and
- Soft landscaping including new native hedgerow and woodland planting, ecological buffer zones, and designated habitat enhancement areas.

Construction of the solar farm is expected to take approximately 6-12 months. All construction activities will be subject to a Construction Traffic Management Plan (CTMP) and Construction Environmental Management Plan (CEMP) to ensure minimal disruption and compliance with best environmental practices.



At the end of the operational life, all infrastructure will be dismantled and removed. The site will be reinstated to its previous agricultural use, with retained biodiversity enhancements providing a long-term legacy benefit.

Environmental designations and constraints

The application site itself is not subject to any statutory or non-statutory environmental designations. It lies in open countryside and is not within a Green Belt, Conservation Area, or protected landscape such as a National Landscape. The nearest statutory designation is Nene Washes SPA and Ramsar Site, approximately 9.3km south of the site.

Flood risk

The entire site falls within flood zone 3a, representing high risk of flooding (Figure 4). As part of the planning application for the proposed development, the applicant was required to demonstrate the proposals did not increase flood risk elsewhere, and so submitted a Flood Risk Assessment and surface water drainage strategy. These were considered acceptable by both Cambridgeshire and Lincolnshire local flood authorities and both LPAs. These documents and the pre-application meeting correspondence with both LLFAs can be found at Appendix 3: Flood Risk Assessment, Drainage Strategy, LLFA Correspondence. The application was supported by a flood risk sequential test which demonstrates that there are no reasonably available, lower risk sites, appropriate for the proposed development and an exception test which demonstrates that the development is safe for its lifetime, and that wider sustainability benefits to the community that outweigh the flood risk. Both LLFAs confirmed that the sequential and exception tests have been satisfied for the proposed development.



Figure 4: Site location with the flood risk map for planning (source: gov.uk)

Agricultural land

Agricultural land is graded using the Agricultural Land Classification (ALC) system. This system classifies land into five grades according to the extent to which physical or chemical characteristics impose long term limitations on the agricultural use of a site for food production. Grades are numbered 1 to 5, with Grade 3 divided into two Subgrades (3a and 3b). According to Natural England



strategic-scale ALC data, parts of the site may fall within grade 2 land, considered best-and-most versatile (BMV) land. However, a site-specific land classification survey was undertaken by a qualified Chartered Surveyor and Fellow of the Central Association of Land Valuers at Bateman Rural Associates Limited and found the majority (88%) of the site is grade 3a land with the remaining 11% of the site constituting grade 2 land. The full ALC survey can be found at Appendix 2 with an extract below at Figure 5.

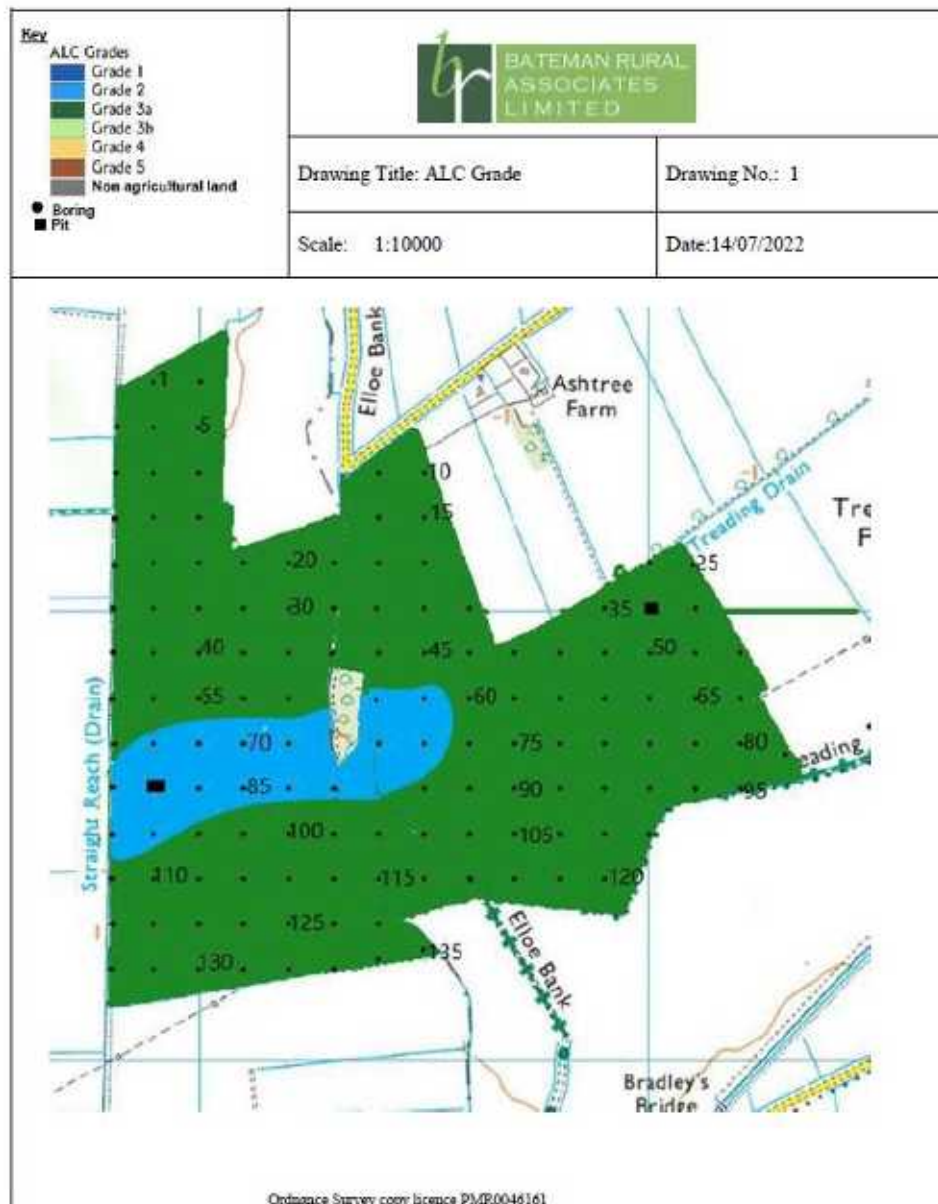


Figure 5: ALC Map

Heritage and archaeology

There are no designated heritage assets within the proposed site boundary. The nearest heritage asset is the grade II listed Church of St Edmund, located approximately 1km to the east. Heritage and archaeological features are indicated on Figure 6 below. The potential impact on this and other



heritage assets has been assessed in the submitted Heritage Impact Assessment. Impacts to heritage assets were subsequently not found to cause objection during determination.

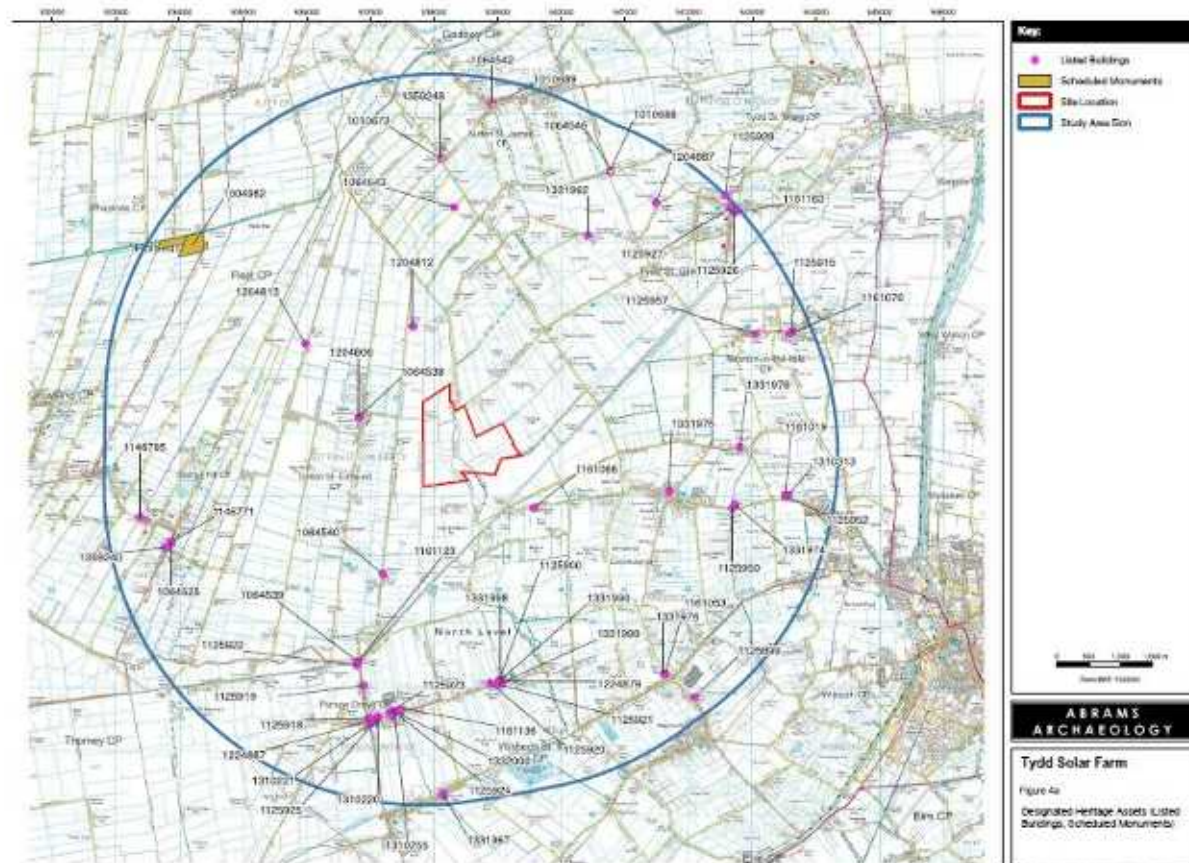


Figure 6: Heritage and archaeological constraints

An archaeological impact assessment that included geophysical and geotechnical surveys was submitted alongside the application. During determination, the Cambridgeshire county archaeologist determined that it would be necessary for the applicant to conduct a trial trenching survey of the site to determine the potential sensitivity of archaeological findings to development. Extensive trial trenching was undertaken with limited archaeological findings, and an absence of evidence for activity prior to the late medieval period. The Archaeological Evaluation Report is attached to this letter as Appendix 4. Following the results of the trial trenching, both County Archaeologists confirmed that they considered it acceptable that the development proceeded, provided conditions were agreed to.

Ecology and biodiversity

The proposed development site is not subject to any specific local, national, or international ecological designations. Nene Washes SPA and Ramsar site is located approximately 9.3km to the south. There are no further statutory or non-statutory ecological designations that are relevant to the application. The site is almost entirely arable fields with minimal hedgerow or grassland habitats. There is a small copse of trees present in the middle of the site.



The proposed development has been thoroughly assessed in respect to impacts on protected habitats and species in accordance with national and local policy, as demonstrated in the Ecological Impact Assessment (EclA) submitted in support of the application. The assessment details the site surveys that were undertaken for the following species:

- Roosting, commuting and foraging bats
- Badgers
- Breeding and wintering birds
- Great crested newts and other amphibians
- Reptiles
- Water voles & otters
- Brown hare

A further site walkover was undertaken by the applicant's ecologist in March 2025 to confirm that the habitat assessment as described in the submitted Ecological Impact Assessment remains accurate and up to date. The EclA concludes that None of the habitats that may be affected by the proposals are of significant interest in terms of their plant species composition. The habitats to be affected contain only common and widespread plant species in the field margins or arable crops. There are no existing Priority Habitats within the areas to be affected by the development. It goes on to confirm that appropriate survey effort and assessment has been carried out to reasonably discount adverse effects on the surveyed species with only a small number of simple mitigation measures during the construction phase being required (e.g. sensitive design and deployment of lighting).

The applicant engaged extensively with Cambridgeshire and Lincolnshire County Ecologists, neither of whom raised an objection to the applications being approved, provided suitable conditions were agreed. The development is considered to have a net beneficial impact on ecology and biodiversity through the introduction of hedgerow and biodiverse habitats within the site.

Scoping approach

In accordance with the EIA Regulations, consideration must be given to the likely significant effects of the proposed development on the environment. This request for a Scoping Opinion seeks confirmation of the proposed scope of assessment, the methodology to be applied, and the structure and content of the Environmental Statement (ES). The ES will accompany the full planning application and inform the local planning authority's decision-making process.

The EIA will consider the potential direct, indirect, secondary, cumulative, short-term, medium-term, long-term, permanent, and temporary effects of the development. Where appropriate, the assessment will include mitigation measures to avoid or reduce significant adverse effects. In line with Regulation 18(3) of the EIA Regulations, the ES will include at a minimum:

"(a) A description of the proposed development, including site location, design, size, and relevant features;

(b) A description of the likely significant effects on the environment;

(c) A description of proposed measures to avoid, prevent, reduce, or offset significant adverse effects;



(d) A description of reasonable alternatives studied and justification for the chosen option;

(e) A non-technical summary of the information above;

(f) Any additional information required under Schedule 4 of the Regulations."

The ES will be prepared in accordance with current best practice guidance and tailored to reflect the specific characteristics of the site and proposed development. A summary of the proposed EIA topics, and justification for scoped-in or scoped-out matters, is set out in the following section.

Proposed scope of EIA

Topics to be scoped in

Based on the characteristics of the proposed development, the site context, and the feedback received from the EIA screening decision and both local planning authority decisions, the following topics are proposed to be included within the Environmental Statement.

Landscape and Visual Impact Assessment

Justification for scoping-in:

- The 140.5ha solar farm will introduce new infrastructure into an open agricultural landscape
- The development includes structures up to 8m in height and solar panels up to 3.5m in height
- Visual impacts on surrounding dwellings and public rights of way require assessment
- Potential for cumulative effects with Meridian Solar DCO project and Treading Bank Solar
- Cited within EIA screening decision as reason for development being considered EIA development

Proposed assessment methodology:

- Desktop review of landscape character assessments and designations
- Field survey to establish baseline landscape character and visual amenity
- Zone of Theoretical Visibility (ZTV) modelling based on 3.5m panel height
- Representative viewpoint selection in consultation with South Holland and Fenland Councils
- Assessment against published guidance (GLVIA3, Guidelines for Landscape and Visual Impact Assessment of Solar Farm Developments)
- Photomontages from key viewpoints
- Cumulative Landscape and Visual Impact Assessment including:
 - Cumulative effects with Meridian and Treading Bank Solar Farms
 - Combined/simultaneous visibility from key receptors
 - Cumulative ZTV analysis showing combined visibility
 - Assessment of landscape character coalescence effects
 - Photomontages showing cumulative views where both developments visible
 - Review of other renewable energy developments within 5km study area

Use of Best-and-Most-Versatile Land

Justification for scoping in:



- Site-specific ALC survey determined the site to be predominantly grade 3a land with a section of grade 2 land, and so the site is entirely BMV land
- Cumulative effects from the proposed development and Meridian and Treading Bank solar farms may mean a substantial amount of agricultural land is temporarily used for solar farms in the area
- Agricultural land is cited within the Secretary of State's EIA screening direction as a reason for the development being considered EIA development.

Proposed assessment methodology

- Assessment of the quality and productivity of agricultural land to be utilised by the proposal.
- Cumulative assessment of total amount of agricultural land that may be utilised for solar panels across all solar schemes in local area, considering surrounding renewable energy developments
- Assessment of the effects of the development on soil quality and outline strategy for the retention of soil quality post-decommissioning.
- Assessment of the impact of the development and cumulative renewable energy developments on local, regional and national food production and consideration of those impacts on national security.

Topics to be scoped out

Based on the characteristics of the proposed development, the site context, and the feedback received from the EIA screening direction and by both local planning authority's original screening opinions, the following topics are proposed to be scoped out of the Environmental Statement.

Ecology and biodiversity

Justification for scoping out:

- Extensive ecological survey work has been undertaken including preliminary ecological appraisal, phase 1 habitat survey, great crested newt survey, breeding birds survey, water vole survey and badger survey, which remain in date;
- Solar developments are generally relatively low impact and so have a lower likelihood of interfering with ecology;
- Significant biodiversity uplift is proposed for the site yielding 173.53% uplift in terms of created habitat units, constituting a substantial ecological and biodiversity benefit; and
- Ecological and biodiversity matters were not objected to by specialist consultees during consultation and therefore no significant adverse ecological effects have been identified either individually or cumulatively. Indeed, it is considered that the proposed development will result in a significant positive effect with regards to ecology and biodiversity when considering current baseline conditions.

Heritage and archaeology

Justification for scoping out:

- No designated heritage assets are present within the site boundary;
- Extensive archaeological works, including geophysical survey, geotechnical survey, and trial trenching were undertaken with findings being considered "scarce"; and



- No objection was raised during consultation for the application and heritage, and therefore no significant cultural heritage or archaeological effects have been identified either individually or cumulatively associated with the proposed development.

Flood risk and drainage

Justification for scoping out:

- Detailed Flood Risk Assessment, Surface Water Drainage Strategy, Sequential & Exception Tests were submitted alongside the application;
- Development design incorporates appropriate buffers from all Internal Drainage Board drains;
- Solar panels have minimal impact on surface water run off; and
- No objection was raised by the lead local flood authorities following consultation and flood risk was not cited as a reason for refusal.

Highways and transport

Justification for scoping out:

- Construction traffic is temporary for 6-12 months;
- Low operational traffic requirements are expected which will be limited to small maintenance vans;
- Existing farm access is considered suitable with minor improvements;
- The rural road network is considered appropriate for construction vehicles; and
- No objection was raised over the proposed construction traffic route.

Air quality

Justification for scoping out:

- Solar development does not generate operational air emissions;
- Impacts from the construction phase will be temporary, localised and managed through the CEMP; and
- No sensitive receptors are located in the immediate proximity which would require detailed assessment.

Noise and vibration

Justification for scoping out:

- Solar panels generate no operational noise;
- Transformer/inverter & BESS noise levels have already been assessed, and are minimal and compliant with British Standards at the nearest residences as noted in the submitted Noise Impact Assessment;
- Construction and decommissioning related noise will be limited considering the relatively minor amount of construction required compared to conventional developments; and
- Impacts from noise or vibration were not cited as a reason for refusal.

Socio-economic effects

Justification for scoping out:



- The proposals provide positive benefits including direct employment during operation;
- There will be no displacement of existing businesses or services;
- There will be temporary construction employment benefits; and
- Agricultural land remains in productive long-term use.

Cumulative assessment

The ES will include assessment of cumulative effects with other developments, particularly:

- Treading Bank Solar Farm (Ref: F/YR25/0758/F) - immediately adjacent to the east;
- Meridian Solar Farm – located 3.5km to the west; and
- Other renewable energy developments within 5km.

Cumulative assessment will focus on:

- Landscape and visual effects; and
- Agricultural land loss.

Climate change

The proposed development would constitute a very substantial contribution to tackling climate change through the provision of clean, renewable energy, and so it is not considered necessary to be scoped into the ES.

Consultation and engagement

The ES will involve consultation with:

- South Holland District Council Planning Department;
- Fenland District Council Planning Department;
- Cambridgeshire and Lincolnshire Highways;
- Natural England;
- Environment Agency;
- Historic England;
- Internal Drainage Board;
- Parish Councils; and
- Local residents and stakeholders.

Environmental statement structure

It is proposed that the ES will comprise:

1. Introduction and Background
2. Development Description
3. Planning Policy Context
4. Alternatives Considered
5. Landscape and Visual Impact Assessment including cumulative effects
6. Agricultural Land and Soils including cumulative effects
7. Cumulative Effects
8. Schedule of Mitigation Measures and Residual Effects
9. Summary and Conclusions



10. Non-Technical Summary (submitted as a separate volume)

Request for scoping opinion

South Holland Council is respectfully requested to provide a scoping opinion confirming agreement with the proposed scope of topics to be assessed, identifying any additional topics requiring assessment, and specifying particular methodology requirements or standards to be applied. The applicant would particularly welcome guidance on consultation requirements and key stakeholders to be engaged, any specific local planning policy considerations that should inform the assessment, and detailed requirements for cumulative assessment, specifically for landscape and agricultural land impacts, given the proximity to the proposed Meridian and Treading Bank Solar Farms. The applicant would welcome the opportunity to discuss this Scoping Request with the Council's planning and technical officers prior to the formal Scoping Opinion being issued.

Conclusion

This Scoping Request sets out a proportionate approach to EIA based on the scale and characteristics of the proposed development and informed by the EIA screening decision issued by the Secretary of State. The proposed scope focuses on the key environmental topics identified by the Secretary of State whilst ensuring efficient use of resources through appropriate scoping out of topics unlikely to result in significant effects.

The Applicant looks forward to receiving South Holland District Council's Scoping Opinion and continuing positive engagement throughout the EIA and planning application process.

Yours sincerely

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Appendix 1: Secretary of State Screening Direction dated 27th January 2026

Appendix 2: Agricultural Land Classification Survey

Appendix 3: Flood Risk Assessment, Drainage Strategy, LLFA Correspondence & Sequential Test

Appendix 4: Archaeological Evaluation Report, prepared by Oxford Archaeology (July 2025)