



SCOPING OPINION

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: Land At Treading Field, Treading Drain, Tydd St Giles, Cambridgeshire

April 2026

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EXECUTIVE SUMMARY

This is the Scoping Opinion (the Opinion) provided by in respect of the content of the Scoping Report submitted by Third Revolutions Projects on behalf of Pathfinder Clean Energy Limited ('PACE') ('the applicant') for 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 proposed) at land at Treading Field, Treading Drain, Tydd St Giles, Cambridgeshire.

This report sets out Opinion on the basis of the information provided in the Scoping Report. The opinion can only reflect the proposals as described by the applicant.

The Council has consulted on the Scoping Report and the responses received have been taken into account in adopting the Opinion. The Council is satisfied that the topic areas identified in the Scoping Report encompass those matters identified in Schedule 4, Part 1, of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Particular regard has also been given to the Screening Direction issued by the Secretary of State, which identified potential for significant effects, in relation to landscape and visual impacts and the use of best and most versatile agricultural land, including cumulative effects with solar developments proposed in the area.

Matters are not scoped out unless specifically addressed and justified by the applicant and confirmed as being scoped out by the Council.

1. INTRODUCTION

Background

- 1.1. On 18th February 2026 the Council received a request for a Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 1.2. The site extends across administrative areas within both Fenland District Council and South Holland District Council, and a parallel scoping request has been submitted, and at the time of writing this response, pending consideration by South Holland District Council.
- 1.3. The site is currently subject to two live planning appeals (Refs: 6001284 and 6001285). During the appeal process, the Secretary of State issued the Screening Direction confirming that the development constitutes EIA development. This Opinion has been prepared having regard to that Direction.

The Council's Consultation

- 1.4. The Council have consulted statutory consultees and relevant stakeholders. Responses received, together with the Secretary of State's Screening Direction have informed the preparation of this Opinion, particularly in respect of cumulative effects and the key topic areas of landscape and agricultural land.

Structure of this Document

- 1.5. This document is structured as follows:
- Section 2 described the proposed development and site context
 - Section 3 addresses the proposed EIA approach
 - Section 4 provides the Council's view on the proposed scope of topic areas
 - Section 5 identifies additional matters to inform the preparation of the Environmental Statement

2. THE PROPOSED DEVELOPMENT

Introduction

- 2.1. This section summarises the proposed development based on the Applicants information and the details provided within the planning application and appeal.

Overview of the Proposed Development

- 2.2. The proposed development This application seeks full planning permission for the installation of a 49.9 megawatt (MW) ground mounted solar photovoltaic (PV) farm and a 30MW Battery Energy Storage System (BESS). The main components of the proposed development, as a whole, comprise:
- Solar PV panels mounted up to approximately 3.5 metres above ground-level on galvanised metal frames;
 - 16No. Solar Inverter cabins;
 - A BESS compound, containing 38No. BESS containers and auxiliary systems such as fire suppression and alarm systems, ventilation and cooling systems, internal lighting and thermal control systems;
 - Inverter cabins (containing inverters and transformers);
 - A substation;
 - Wire mesh deer fencing (approximately 2 metres high) containing small mammal gates, vehicle entrance gates and Closed Circuit Television Cameras (CCTV);
 - An equipment storage building;
 - Access tracks;
 - Underground engineering operations
- 2.3. Permission is sought for a temporary period of 42 years. The development would have an operational period of up to 40 years, after which the site would be decommissioned and restored. Permission is sought for a temporary

period of 42 years to accommodate up to one year for construction and up to one year for decommissioning.

Description of the site and surroundings

The Application Site

- 2.4. The application site comprises approximately 140.5 hectares of agricultural land, with approximately 66.2 hectares located within the Fenland district and approximately 74.3 hectares located within the South Holland district. The application site is therefore cross-boundary between the districts of Fenland and South Holland and also cross-boundary between the counties of Cambridgeshire and Lincolnshire.
- 2.5. The application site has a reasonably flat topography which is generally consistent with the surrounding fen landscape. The vast majority of the application site comprises agricultural fields, with other notable features within the application site comprising drainage ditches, trees, electricity pylons, a Public Bridleway (Path Number 13: Tydd St Giles), a Public Byway (Path Number 19: Tydd St Giles), and two Public Footpaths (Public Footpath SuSE/8/1 and Public Footpath Tydd/4/1).
- 2.6. The application site is located within Flood Zone 3.
- 2.7. The western boundary of the application site is predominantly located adjacent to the Straight Reach (Drain); though part of the application site extends along Public Footpath SuSE/8/1 and adjoins Guanockgate Road to the west of the Drain. The application site is otherwise surrounded by agricultural land.
- 2.8. Agricultural land classification surveys provided, indicate the site comprises predominately Grade 3a land (117 hectares) with a smaller portion of Grade 2 land (15 hectares). The entirety of the site is therefore classified as best and most versatile (BMV) agricultural land.

Surrounding Area

- 2.9. The surrounding area is characterised by open, intensively farmed arable land with a sparse settlement pattern. The landscape is expansive and open in character with limited enclosure.
- 2.10. The nearest residential properties to the application site are located along Guanockgate Road (to the north and west), Broad Drove West (to the east) and Eloë Bank (to the south).
- 2.11. The nearest heritage assets to the application site comprise the Church of St Edmond (Grade II listed) located approximately 1 kilometres to the west, Honeyhill Farmhouse (Grade II listed) located approximately 1.5 kilometres to the south, Guanock House (Grade II listed) located approximately 1.1 kilometres to the north, and a standing cross Scheduled Monument (Historic

England List Entry Number 1010672) located approximately 3 kilometres to the north.

- 2.12. The nearest settlement is Sutton St Edmund, to the west. A Grade II Listed Church lies approximately 1km from the site (Church of St Edmund). There are no statutory landscape or ecological designations within the site. However, the site sits 9.3km to the north of the Nene Washes SPA and Ramsar site.

3. EIA APPROACH

Introduction

- 3.1. The Council has reviewed the proposed approach to EIA as set out in the Scoping Report.

EIA Approach

- 3.2. The Council supports the Applicant's intention to undertake a proportionate EIA, focusing on the likely significant effects of the development. The ES should assess direct, indirect and cumulative effects during construction, operation and decommissioning.
- 3.3. The ES should clearly define assessment, methodologies, study areas and significant criteria and should be consistent with relevant guidance and best practice. The Council emphasises the importance of robust cumulative assessment, in light of the Secretary of State's Screening Direction and the presence of other solar developments in the locality including:
- Treading Bank Solar Farm (Ref: F/YR25/0758/F) – immediately adjacent to the east;
 - Meridian Solar Farm 3.5km to the west
 - Other renewable energy and major developments within 5km
- 3.4. Given the stage at which this Opinion has been sought, the Council considers that the supporting documents submitted alongside the original application provide valuable evidence base in assessing potential impacts. This allows for a more informed view than would typically be available at the pre-application stage, where such detailed information may not yet have been prepared or tested through the determination process.

Matters to be Scoped Out of Assessment

Ecology and Biodiversity

- 3.5. The Applicant considers that due to the extensive ecological survey work carried out to date, alongside the nature of solar development in that they are generally low impact and have a lower likelihood of interfering with ecology, the significant biodiversity uplift as a result of habitat created, that this matter can be scoped out.

- 3.6. The Council agrees with the approach as detailed and considers that given the supporting documentation already provided, which remains valid and in date. Furthermore, during the determination of the application these matters were not objected to by statutory consultees, with no significant adverse ecological effects having been identified individually, and by association, cumulatively, this has been maintained as part of the Scoping consultation. **It is therefore agreed that this matter can be scoped out of the ES.**

Heritage and Archaeology

- 3.7. The Applicant considers that given no designated heritage assets are present within the site boundary alongside the extensive archaeological works undertaken including trial trenching with findings being considered scarce that this matter can be scoped out.
- 3.8. The Council agrees with the approach as detailed and considers that given the supporting documentation already provided, which remains valid and in date. Furthermore, during the determination of the application these matters were not objected to by statutory consultees, with no significant cultural, heritage or archaeological effects, having been identified individually, and by association, cumulatively, this has been maintained as part of the Scoping consultation. **It is therefore agreed that this matter can be scoped out of the ES.**

Flood Risk and Drainage

- 3.9. The Applicant considers that this matter can be scoped out on the basis that a detailed Flood Risk Assessment, surface water drainage strategy, and sequential and exception tests have already been undertaken and agreed by the relevant Lead Local Flood Authorities. The Applicant further notes that the development incorporates appropriate design measures, including buffers to drainage features, and that solar development is unlikely to materially increase surface water runoff.
- 3.10. The Council broadly agrees with the approach as detailed, noting that the supporting documentation has previously been reviewed by the relevant consultees with no objections raised, and that the site design responds appropriately to flood risk constraints. Furthermore, no significant adverse effects relating to flood risk or drainage were identified during the determination of the application.
- 3.11. However, given the location of the site within Flood Zone 3a, the ES should include a concise summary of the findings of the Flood Risk Assessment and confirm that there are no likely significant effects, including cumulatively. Subject to this, it is agreed that a full standalone assessment is not required. **It is therefore agreed that this matter can be scoped out of the ES.**

Highways and Transport

- 3.12. The Applicant considers that this matter can be scoped out due to the temporary nature of construction traffic, the limited operational traffic associated with the development, and the suitability of the existing access arrangements and local road network. The Applicant also notes that no objections were raised in respect of highways matters during the determination of the application.
- 3.13. The Council accepts that operational traffic is likely to be minimal and that construction impacts are temporary in nature. Furthermore, no significant adverse effects were identified during the determination of the application.
- 3.14. However, the Council considers that additional consideration should be given to the potential cumulative impact on the local highway network, particularly in the event that nearby solar developments, including Treading Bank Solar Farm and Meridian Solar Farm, are constructed within similar timeframes. This has the potential to result in increased traffic movements and associated impacts.
- 3.15. On this basis, a proportionate assessment of construction traffic, including cumulative effects, should be provided within the ES or supporting documentation submitted originally to be updated accordingly. Subject to this clarification, a full detailed assessment is not required. **It is therefore agreed that this matter can be scoped out of the ES.**

Noise and Vibration

- 3.16. The Applicant considers that this matter can be scoped out on the basis that solar panels do not generate noise during operation, that associated infrastructure such as inverters and battery storage has already been assessed and demonstrated to comply with relevant standards, and that construction noise will be temporary and limited.
- 3.17. The Council agrees with the approach as detailed and notes that a Noise Impact Assessment has already been undertaken, demonstrating that operational noise levels are within acceptable limits at nearby receptors. Furthermore, no objections were raised by relevant consultees during the determination of the application, and no significant adverse effects have been identified. **It is therefore agreed that this matter can be scoped out of the ES.**

Socio-economic effects

- 3.18. The Applicant considers that socio-economic effects can be scoped out, noting that the development would provide temporary construction employment, limited operational employment, and would not result in the displacement of existing businesses or services. The Applicant also states that agricultural use of the land can continue in part and will be reinstated following decommissioning.

- 3.19. The Council agrees with the approach as detailed and considers that the development is unlikely to give rise to significant adverse socio-economic effects. The anticipated benefits, including renewable energy generation and temporary employment opportunities, are noted. **It is therefore agreed that this matter can be scoped out of the ES.**

Population and Human Health

- 3.20. The Applicant has not identified population and human health as a standalone topic, and it is considered that potential effects would be addressed through other topic areas such as noise, traffic, air quality and landscape.
- 3.21. The Council agrees with this approach and considers that there is no evidence to suggest that the development would give rise to significant adverse effects on population or human health. Any potential effects are likely to be limited, localised and adequately controlled through standard mitigation measures. **It is therefore agreed that this matter can be scoped out of the ES.**

Air Quality

- 3.22. The Applicant considers that air quality can be scoped out on the basis that the development would not generate operational emissions and that construction phase effects would be temporary, localised and controlled through mitigation measures set out within a Construction Environmental Management Plan.
- 3.23. The Council agrees with the approach as detailed and notes that no significant air quality impacts were identified during the determination of the application, and no objections were raised by relevant consultees. **It is therefore agreed that this matter can be scoped out of the ES.**

Waste Management

- 3.24. The Applicant has not proposed waste management as a standalone topic within the ES, on the basis that waste arising during construction and decommissioning can be appropriately managed through standard measures.
- 3.25. The Council agrees that the development is unlikely to give rise to significant adverse effects in relation to waste. Waste generation would primarily occur during construction and decommissioning phases and can be managed through the implementation of a Site Waste Management Plan or similar measures secured by condition. **It is therefore agreed that this matter can be scoped out of the ES.**

Agricultural Land Use and Soils/BMV

- 3.26. The Applicant considers that this matter should be scoped into the ES on the basis that the site comprises entirely best and most versatile (BMV) agricultural land, predominantly Grade 3a with a proportion of Grade 2 land.

The Applicant also acknowledges that the Secretary of State's Screening Direction identified the use of BMV land, particularly in combination with other solar developments in the area, as a key consideration in determining that the development constitutes EIA development. The potential for cumulative impacts on agricultural land resource has therefore been identified as requiring assessment.

3.27. The Council agrees with the approach as detailed and confirms that this is a key topic which must be fully assessed within the ES. The loss of BMV land, even on a temporary basis, is a matter of significant weight in planning policy and requires robust consideration.

3.28. The ES should:

- Provide detailed and verified Agricultural Land Classification (ALC) data across the site, clearly setting out the extent of Grade 2 and Grade 3a land
- Quantify the extent and duration of land to be taken out of conventional agricultural production
- Assess the direct effects on soil resources, including soil stripping, storage and reinstatement
- Clearly demonstrate how soil quality will be protected and restored during and following the operational phase
- Consider the reversibility of the development and the extent to which the land can be returned to its original agricultural quality

3.29. In addition, particular emphasis should be placed on cumulative effects. The ES should assess the combined impact of this development with other solar schemes in the locality, including Treading Bank Solar Farm and Meridian Solar Farm, on the availability and use of BMV land. This should include consideration of the potential implications for agricultural productivity at a local and, where appropriate, wider scale.

3.30. The assessment should be proportionate but sufficiently robust to enable the Council to reach a reasoned conclusion on the significance of effects.

Landscape and Visual Impacts

3.31. The Applicant considers that landscape and visual impacts should be scoped into the ES due to the scale of the development, the introduction of built infrastructure into an open rural landscape, and the potential for visual effects on nearby receptors including users of public rights of way, surrounding settlements and public vantage points. The Applicant also identifies the potential for cumulative effects with nearby solar developments, which was a key factor in the Secretary of State's Screening Direction.

3.32. The Council agrees with the approach as details and confirms that landscape and visual impacts represent a principle consideration for this development.

3.33. The ES should include a Landscape and Visual Impact Assessment (LVIA) undertaken in accordance with current best practice guidance, including Landscape Institute Technical Guidance Note 02/21 (assessing landscape value outside national designations). The assessment should:

- Define the baseline landscape character, including reference to relevant landscape character assessments
- Identify any valued landscapes and assess their sensitivity to change
- Assess the effects of the development on landscape character and visual amenity
- Include a clear methodology for determining significance of effects.

3.34. Visual assessment should include:

- Identification of viewpoints, including residential receptors and public rights of way (to be agreed with LPA)
- Zone of Theoretical Visibility (ZTV)
- Photographs and photomontages from agreed viewpoints (to be agreed with LPA)
- Consideration of seasonal variation

3.35. A comprehensive cumulative assessment is required. This should include:

- Assessment of intervisibility with nearby solar developments, including Treading Bank Solar Farm and Meridian Solar Farm
- Consideration of combined and sequential views
- Assessment of potential landscape character change arising from the concentration of solar development
- Cumulative CTV mapping and, where appropriate, cumulative photomontages.

3.36. The assessment should directly address the issues identified within the Secretary of State's Screening Direction and provide a clear and robust evaluation of both individual and cumulative effects.

3.37. The Council expects the LVIA to be proportionate to the scale of development but sufficiently detailed to allow a clear understanding of the likely significant effects.

4.0 CONCLUSION

4.1 The Council considers that the proposed scope of the Environmental Impact Assessment provides a broadly appropriate basis for the preparation of the Environmental Statement.

4.2 The identification of Landscape and Visual Impacts and Best and Most Versatile Agricultural Land as key topics is supported and these should be subject to robust assessment, including cumulative effects with other nearby solar developments.

- 4.3 While a number of topics may be scoped out, sufficient information should be provided to demonstrate that no likely significant effects would arise, cumulatively. This should include a proportionate assessment of cumulative impacts on the local highway network, particularly where construction phases may overlap with nearby schemes. In addition, appropriate consideration should be given to impacts on Public Rights of Way, including the provision of a mitigation strategy covering temporary closures or diversions, user safety and reinstatement of routes.
- 4.4 Subject to the requirements set out in this Opinion, the Council is satisfied that the Environmental Statement should enable a reasoned conclusion to be reached in accordance with the EIA Regulations.

APPENDIX 1 – LIST OF CONSULTEES

Consultee	Response
National Gas Transmission	05/03/2026
National Gas Transmission	23/03/2026
Fenland Highways Division	16/03/2026
Designing Out Crime Officers	24/03/2026
Environment & Health Services (FDC)	16/03/2026
Mr Dan Horn (FDC)	-
CCC (Lead Local Flood Authority)	12/03/2026
Head Of Environmental Services (Mark Mathews)	17/03/2026
Development Manager Transport (FDC) (W Otter)	No response
Parish/Town Council	No response
Ward Default	No response
North Level Internal Drainage Board	No response
The Ramblers Association (G Thomas C/o B Foster)	No response

Definitive Map Team	11/03/2026
British Horse Society	No response
Arboricultural Officer (FDC)	No response
The Wildlife Trust	No response
FDC Ecology	05/03/2026
South Holland DC (Housing & Plan Services)	No response
Active Travel England	03/03/2026
Highways Division	16/03/2026
Environment Agency	24/03/2026
Natural England (Francesca Shapland)	06/03/2026
Anglian Water Services Ltd	12/03/2026
Senior Archaeologist (CCC)	13/03/2026
Principal Licensing Officer (FDC)	No response
WWA Landscape	20/03/2026

APPENDIX 2 – RESPONSES FROM CONSULTEES

SUMMARIES

Please note that full details of the responses received are available for viewing on the Council website.

Consultee	Comments
National Gas Transmission	High pressure Gas pipelines run through the land and could be affected by AC or D/C interference from the proposed installation. No development is permitted within the easement without formal written approval from National Gas Transmission.
Fenland Highways Division	A construction Traffic Management Plan must be prepared or conditioned and all other matters associated with the highway impact should be addressed in a Transport Assessment submitted with a future application.
Designing Out Crime Officers	Advice provided in terms of site security and designing out crime principles.
Environment & Health Services (FDC)	As with the original application, all previously identified noise mitigation measures should be carried forward. We also request restricted working hours as previously specified are retained to limit

	potential noise impacts on nearby residential properties.
CCC (Lead Local Flood Authority)	The Environmental Impact Assessment Scoping Report submitted includes information of the water environment proposals. The principles of surface water drainage outlined within the scoping report are acceptable. We note the report states that in response to the LLFA pre-application meeting a separate Surface Water Management Plan, (ref. FCL/644/SW01) was also submitted in support of this application. This has not been submitted for formal review as part of this scoping opinion. A Surface water drainage strategy will need to be submitted to support any future application.
Head Of Environmental Services (Mark Mathews)	We recommend the ES includes the noise mitigations measures as set out within the original planning application and that working hours are restricted as previously specified.
Definitive Map Team	The proposal is likely to affect several different public Rights of Way (PRoW) and should therefore, provide a Rights of Way mitigation strategy to include the proposed effect, timings and locations for any temporary traffic regulation orders, warning signs where construction interacts with PRoW and any diversions, details of proposed dilapidations surveys and a commitment to return the surfaces to the condition as they were prior to construction.
FDC Ecology	Given the development is unlikely to affect any sites designated for nature conservation value or significant populations of specially protected or priority species, I would considered Ecology and Biodiversity matters could be scoped out of the EIA.
Active Travel England	Standard advice note provided.
Highways Division	A construction Traffic Management Plan must be prepared and could be conditioned. All other matters should be addressed in a Transport Assessment.
Environment Agency	We are satisfied with the approach set out in the Scoping Report.
Natural England (Francesca Shapland)	Standing Advice notably: The development site may impact of the Nene Washes (Whittlesey) SSSI. The ES should include a full assessment of the potential impacts of the development on local landscape character. Impacts of the development on soils and best and most versatile (BMV) agricultural land should be considered, the ES should set out details of how adverse impacts on BMV land can be minimised alongside how any adverse impacts on soils can be avoided/minimised. The ES should identify how the development affects the ability of the natural environment to adapt to

	climate change. The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains.
Anglian Water Services Ltd	The proposed development has the potential to require non-domestic water for construction and based operations activities at the site. A water resources strategy will be required.
Senior Archaeologist (CCC)	Archaeological trial trenching and geoarchaeological evaluation has been undertaken across the development area, this details findings of late medieval to post-medieval ditches, sporadic peat layers and small sinuous former channels. Well preserved Mesolithic to neolithic peat was detected however this is deeply buried and beyond the impact of the development. No further mitigation is required for the Cambridgeshire portion of the scheme.
WWA Landscape	A Landscape and Visual Chapter is fundamental to the EIA. The proposed assessment methodology looks to be appropriate and welcome agreement of LVIA viewpoints and photomontage locations with the LPA in advance. Would add clarity regarding the Landscape Institute Technical Guidance Note 02/21 as part of the methodology.