

By email to: beaconfen@planninginspectorate.gov.uk

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Date: 7 October 2025

Dear Sir/Madam

Planning Act 2008 – Section 89 and The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 8 and 9, 10, and 17

Application by Beacon Fen Energy Park Limited for an Order Granting Development Consent for the Beacon Fen Energy Park Project

Following the Planning Inspectorates Rule 8 letter dated 01 October 2025 the County Council submits its written representation in respect of this application. The Council provided initial comments in relation to this application in its Relevant Representation response earlier this year and full details on the impacts of the development in our Local Impact Report (LIR) submitted 07 October 2025 at deadline 1.

This written representation provides the Council's updated position following consideration of the application by the Council's Planning and Regulation Committee on 29 September 2025.

This written representation has been prepared in accordance with PINS advice note 8.4 and should be read in conjunction with the Council's LIR submitted by the Council at deadline 1. The LIR was brought to the Council's September Planning Committee when it was resolved to approve the Impact Report for submission. Based on the findings of this impact report the Council resolve to submit a **formal objection** to the application on the following grounds:

The Beacon Fen Energy Park aims to contribute to renewable energy generation, with a capacity of 400MW. The Council acknowledges that this aligns with the objectives of National Policy Statements and key national government commitments. Positive impacts in terms of the potential to deliver significant biodiversity net gain through the creation of mitigation and enhancements and some enhancement to the Public Right of Way (PRoW) network are proposed as part of the development. There are also some limited socio-economic benefits, the potential creation of employment opportunities and increased spend on local services during the construction phase however these would be time-limited and therefore need to be balanced against any negative impacts identified.

At this time these positive benefits are not considered to outweigh the negative impacts, that arise given the overall size and scale of the development both on its own and in combination with the other NSIP scale infrastructure projects proposed in this geographical area as follows:

A significant negative impact upon the landscape character and visually both individually and cumulatively with other projects which results in the conclusion that the scheme would be contrary to Central Lincolnshire Local Plan policies S5 (Development in the Countryside), S14 (Renewable Energy) and S53 (Design and Amenity). By reason of its mass and scale, the development would lead to significant adverse effects on landscape character and visual amenity at all main phases of the scheme. The development has the potential to transform the local landscape by altering its character on a large scale and consequently affect a wider regional scale landscape character, through significant land use change. The replacement of large areas of agricultural or rural land with solar development, will affect the current openness, tranquillity and agricultural character that are identified as defining characteristics of the area. The alteration of views within an agricultural or rural landscape to that of a landscape with large scale solar development would also result in significant adverse effects on views from receptors.

The development would result in adverse impacts on the setting of designated and non-designated heritage assets. The significance and special interest of the identified assets would be eroded by the change in landscape character arising from the solar farm and associated infrastructure. The applicant's assessment underestimates the scale of harm to several designated and non-designated receptors, particularly where the contribution of setting and group value has been overlooked. Based on the information submitted at this stage the proposal would result in harm to built heritage assets that has not been convincingly justified and further assessment and mitigation will be required to demonstrate compliance with planning policies. The potential for slight adverse impacts on archaeology has also be identified. As such it is considered the proposed development would have a negative impact on heritage assets and would be contrary to CLLP policy S57 (The Historic Environment), and South East Lincolnshire Local Plan (SELLP) policies 2 (Development Management), 3 (Design of New Development) and 29 (The Historic Environment).

A significant and permanent negative impact as a consequence of the loss of Best and Most versatile (BMV) agricultural land is identified. The proposal involves the loss of 277.3ha BMV land (56%). This can be broken down to 20.37ha permanent loss due to sealing over (e.g. from access roads, compounds and other built infrastructure) and 256.93ha temporary loss of BMV land (47%) for 40+ years, which is a substantial period. This loss is not only at a local level but significant when considered in-combination with the loss of land from other NSIP scale solar developments that are also being promoted and considered across Lincolnshire, contrary to CLLP policy S67 (Best and Most Versatile Agricultural Land) and SELLP Policy 31 (Climate Change and Renewable and Low Carbon Energy).

The potential for several negative socio-economic impacts have been identified. These include significant pressure on local services, particularly accommodation, due to the temporary construction workforce, with cumulative impacts acknowledged as major. The development's location within two valued National Character Areas raises

potential risks to the visitor economy, which are not fully addressed. Additionally, the ES does not assess the economic impact of reduced agricultural output, nor the broader effects on the food supply chain. The combined socio-economic effects of this and other NSIPs are considered substantial and insufficiently analysed or mitigated within the application. Furthermore, the temporary closure of multiple footpaths during the construction phase is likely to result in a detrimental impact on the accessibility and functionality of the wider PRoW network.

Additional information is needed to demonstrate how waste arising from solar infrastructure would be sustainably managed. Currently there are no facilities to process and recycle solar panels and associated equipment. When combined with the other solar projects in the County that have either had DCOs granted or that may be granted in the near future, would present a significant issue as additional facilities would be required to ensure these products are sustainably disposed. As such it is considered to be contrary to Lincolnshire Minerals and Waste Local Plan (LMWLP) policy W1 (Future Requirements for New Waste Facilities).

The nature and scale of current and emerging proposals relating to large scale solar developments and other NSIP scale developments in Lincolnshire is significant. 5 NSIP scale solar schemes have been granted a DCO in Lincolnshire and a further 8 schemes (including Beacon Fen) are either progressing through examination or are at pre application stage. In addition the County is host to a further 10 NSIP proposals including five Great Grid Upgrade proposals and a new Lincolnshire reservoir. The cumulative effects of the Beacon Fen Energy Park, in combination with other major infrastructure developments identified, could be considerable. The cumulative impacts of the Beacon Fen Energy Park, combined with the other developments identified (both TCPA and NSIP) could be significant and include landscape and visual effects, the long-term loss of BMV agricultural land, potential impact on ground nesting birds, socio-economic factors and waste.

In conclusion, whilst the Council currently objects to the proposed development on a number of grounds, the Council will continue to engage with the applicant and Examining Authority throughout the examination period in an attempt to resolve many of these concerns as possible by the close of examination.

Councillor Paul Lock, in his capacity as the County Council representative for the Boston Rural District, has also provided a written representation independently of the formal Council position outlined above. This separate submission is provided in addition to this representation.

Yours faithfully,

On behalf of Neil McBride Head of Planning