

## **Beacon Fen Energy Park DCO**

### **Application by Beacon Fen Energy Park Limited**

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**POST HEARING SUBMISSIONS**  
**ON BEHALF OF LINCOLNSHIRE COUNTY COUNCIL**  
**AT DL1**

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#### **Introduction**

1. Lincolnshire County Council (“LCC”) attended the Preliminary Meeting (PM) and first Issue Specific Hearing (ISH) held on 23<sup>rd</sup> and 24<sup>th</sup> September 2025 respectively. A summary of LCC’s oral representations for both hearings appears below.

#### **Preliminary Meeting**

2. LCC remains concerned to ensure that members of the public wishing to participate in the examination are able to do so. It was noted that the OFH had been cancelled through a lack of those signed up to participate. LCC is concerned that holding entirely online hearings may be excluding members of the public wishing to attend and very much welcomes the ExA’s intention to hold hybrid hearings for ISH2 and beyond. LCC would encourage the ExA to schedule another OFH at a time and in a manner that would allow residents to attend in person if so desired.
3. LCC notes that ISH1 is relatively narrow in scope and requests that the ExA give consideration to holding ISHs in relation to the draft DCO, cumulative effects, agricultural land and to revisit the consideration of flood risk following the submission of any further information by the Applicant on this topic.

#### **ISH1**

##### **Item 3- General**

4. LCC is concerned that the Applicant has not fully justified the inclusion of a BESS at the proposed scale as ‘associated development’ within the DCO.

5. The Applicant's planning statement [APP 277] addresses this issue in part at paragraph 1.6.7 where it is stated that *"The capacity of the BESS is proportionate as it is sized to make efficient use of the connection with an output capacity of 600 MW. Furthermore, paragraph 2.10.16 of NPS EN-3 explicitly states that energy storage may be considered associated development alongside solar farms."*
6. However, the requirement is not for it to be proportionate to the grid connection but *"subordinate to the project"*. Proportionality should also be considered relative to the development i.e. the development that is properly an NSIP. A 600MW BESS is not self evidently proportionate or subordinate to a 400MW solar scheme.
7. 'Planning Act 2008: Guidance on associated development applications or major infrastructure projects' (April 2013)) states that *"Associated development should be proportionate to the nature and scale of the principal development"* and *"The definition of associated development requires a direct relationship between associated development and the principal development. Associated development should therefore either support the construction or operation of the principal development, or help address its impacts... ii. Associated development should not be an aim in itself but **should be subordinate** to the principal development."* (Emphasis added).
8. Here, that is the solar array and its generation capacity, not solely the footprint of that development. The Guidance plainly envisages consideration of both nature and scale – i.e. a fully textured analysis of the relationship between the associated development and the main project and consideration as to whether it is genuinely intended to support the main project, this is not a test that is passed simply on a 2D assessment of land use.
9. In short, BESS capacity above that of the solar generation calls for a clear explanation as to how it is (1) subordinate and (2) "supports the operation of" the solar in relation to the capacity that exceeds that provided by the panels.
10. LCC notes that the omission of waste and health from the ES. It would encourage both these matters to be considered carefully by the ExA. This is particularly so in relation to waste where LCC notes that the Applicant has not evidenced the availability of funding for the decommissioning stage ( a matter addressed in LCC's LIR at paragraph 18.1). In relation to health, LCC would seek a health impact assessment aligned with CLLP Policy S54 in the absence of an ES chapter on this topic to allow health impacts to be properly taken into account (a matter addressed at paragraph 14.7 of LCC's LIR).

#### **Item 4 - Alternatives**

11. LCC is not persuaded by the Applicant's explanation as to why split sites were excluded from the site selection assessment. In the planning statement [APP277] at paragraph 3.4.7 the Applicant states that *"As the proposed Site is continuous, collections of non-continuous sites which when taken together cover an area greater than 300 ha were not considered as there would be likely increased costs in surveying, designing, screening, connecting and legally securing (with reference to land ownership) multiple separate sites which would impact viability and make them incomparable to the continuous Proposed Site"*
12. However, LCC is host authority to a number of other NSIP scale solar schemes which have included split sites such as Cottam. It is therefore clearly not the case that all split sites are "unviable" and there is a question as to whether the Applicant's assertion that this would "impact viability" would cross over into making the scheme "unviable" properly so called. Clearly additional cable runs etc would come at a cost but the rationale given for excluding split sites calls for additional evidence when it is clear that other developers have viably developed such sites even when not required to do so in order to avoid areas of flood risk. As a justification for including development within areas of higher flood risk, this falls short in LCC's view.
13. This matter, in so far as it feeds into the Applicant's ability to pass the sequential test in terms of flood risk is addressed in section 11 of LCC's LIR.

#### **Item 6 – Access and traffic**

14. As set out in section 10 of LCC's LIR, LCC as highway authority is content with the proposed access arrangements subject to matters relating to further approvals being included within a CTMP.
15. LCC objects to the closure of some of the proposed PROW and this is addressed in the LIR in Section 13. LCC would also request the submission of a PROW management plan to address how crossings and closures of PROW will be managed during the construction and decommissioning phases of the development.