Lincolnshire Wildlife Trust

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7th October 2025

RESPONSE TO: Beacon Fen Energy Park – Examination Stage Deadline 1

Dear Sir/Madam,

Lincolnshire Wildlife Trust wishes to make the following comments with reference to Deadline 1 of the Examination Stage of the Beacon Fen Energy Park. We are aware that the Trust is not registered as an interested party for this examination. However, given our contributions to the application process to date, and the importance of the matters raised here, we respectfully ask that the Examining Authority accepts this submission and considers the points set out below.

Skylark

In our response to the Beacon Fen Energy Park (the Project) Statutory Consultation (22 January – 3 March 2024), we raised key concerns regarding the potential effects of the Project on local populations of ground-nesting birds (GNB), specifically Skylark. In that response, we stated our expectation that all lost Skylark territories should be compensated for on other land under the Applicant's ownership where possible, with offsite contributions discussed with the Trust if required.

We emphasised our position that, while an individual solar farm may not have a measurable negative impact on GNB at a population level, the cumulative scale of solar farm developments being proposed across Greater Lincolnshire presents a genuine risk to county-level populations. As such, we will continue to take a consistent approach in raising this issue.

Appendix 7.6 of the Environmental Statement (ES) (Breeding Bird Survey) records 71 Skylark territories within the "Northern Site" and 58 within the "Southern Site" – a total of 129 territories. These are significant numbers, particularly given Skylark conservation status; they are Red-listed Birds of Conservation Concern (BoCC), a Priority Species in England under the Natural Environment and Rural Communities (NERC) Act 2006, and also a Priority Species under the Lincolnshire Biodiversity Action Plan (BAP). We therefore maintain that our request for the Applicant to properly mitigate and compensate for losses of Skylark territories is both justified and reasonable.

Having examined the Preliminary Ecological Appraisal (PEA), Chapter 7: Ecology (ES), and Appendix 6.7 (Outline Landscape and Ecological Management Plan – OLEMP), we are

disappointed to see that the issue of Skylark territory loss has been largely neglected, and that compensation remains insufficient.

Paragraph 7.6.21 of Chapter 7 (ES) states:

> "The Site supports ground nesting birds, including skylark, which prefer open nesting areas. Within the open buffer areas adjacent to ditches, and in the wildflower meadows the habitats will be improved for this species. This will include delaying grassland cuts until after young are fledged; cut from June onwards and no more than once every seven weeks. These should increase the density of birds supported, and partially replace the areas lost. The details of these habitat enhancements will be included in the OLEMP."

Paragraphs 2.6.30–2.6.32 of the OLEMP (Protected Species Enhancement Measures – Birds) add:

> "Minor sections of hedgerow are proposed to be removed to allow access between fields within the Solar Array Area, Cable Route Corridor and Bespoke Access Corridor, so potential nests could be impacted by the construction works. To avoid this impact, site clearance works will be undertaken where possible outside of the active nesting season (taken to be March to August inclusive). In the event that such timescales cannot be accommodated, a check for the presence of active nests will be undertaken by the ECoW prior to commencement of works. Any active nests recorded would be identified and protected until the nesting attempt is complete.
>
> The woodland margin, scattered trees and the majority of the hedgerows which harbour the potential to support nesting birds will be retained and enhanced. This will increase nesting/foraging suitability across the Site.
>
> Along with the habitats being retained, newly created habitats will provide further nesting and foraging opportunities. With the proposed newly created areas of species-rich grassland, hedgerow and native shrubs with trees, it is anticipated that the Site could support a more varied bird assemblage as these habitats develop over time."

Skylarks require open vistas to breed, meaning small field margins and grassland patches are not sufficient. While we support the retention and enhancement of woodland margins, scattered trees and hedgerows, these measures offer no compensation for the loss of Skylark breeding habitat. We assume that the "newly created areas of species-rich grassland" refer to the proposed lowland meadow and floodplain grazing habitats. Although we support the creation of these areas in principle, they are not adequate to account for the potential loss of 129 Skylark territories.

We therefore request that Skylark Mitigation Plots are incorporated into the Project plans. These plots should be a minimum of 16 m² each and located at least 50 m from field boundaries and margins to reduce predation risk. As Skylarks require open vistas to breed, such plots cannot be placed within the solar panel arrays; they are typically located in nearby arable fields. Calculations should be undertaken by the Applicant to determine how many plots are needed to compensate fully for the territories lost, and our position remains that at least as many plots should be created as will be lost due to the development.

Biodiversity Net Gain/Habitat Creation

We note that the Applicant has classified post-development habitat beneath the solar panels as modified grassland in moderate condition. The use of modified grassland in this context is supported; however, we caution that research findings conflict regarding the influence of solar panel shading on species composition and survival rates. Although a failure to achieve moderate condition would not drastically alter the projected habitat unit gains, the overall net gain figure of the development remains relatively low compared with other solar NSIP projects in Lincolnshire, where estimated net gains of around 100% per 500 ha have been reported.

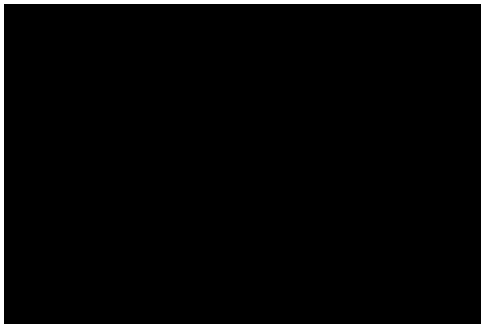
Given this, and particularly as the predicted uplift depends on achieving moderate condition beneath the panels, we consider that the Applicant could and should do significantly more to enhance local biodiversity. Table 3 of the Biodiversity Net Gain Strategy shows that 0 ha of existing habitat are proposed for enhancement. Table 4 identifies creation of 14.6 ha of lowland meadow, 13.14 ha of other neutral grassland, 2.96 ha of mixed scrub, and 2.78 km of native hedgerow (in addition to 461.07 ha of modified grassland). For a solar array area of 529 ha, these figures are disappointingly low. The Applicant has also not taken forward our pre-examination advice to explore novel approaches to habitat heterogeneity onsite – for example, varied seed mixes along field edges.

We therefore strongly recommend an increase in the area of land designated for biodiversity enhancement. While we recognise the urgency of addressing the climate crisis, the parallel decline in biodiversity is another global emergency that cannot be overlooked. The UK is one of the most nature-depleted countries on Earth[1]. Developments such as Beacon Fen Energy Park are uniquely placed to contribute to both climate and nature recovery, yet the current proposals give insufficient weight to the latter.

We therefore urge the Applicant to prepare a comprehensive Skylark Mitigation Strategy and to increase Biodiversity Net Gain uplifts. This should include the creation of further lowland meadows and the establishment of buffer strips or field margins sown with local provenance mixes, ensuring that biodiversity is given meaningful representation within the final design.

Lincolnshire Wildlife Trust respectfully requests that the Examining Authority accepts this submission, in light of our ongoing engagement with the project and our clear interest in its ecological outcomes. The Trust remains willing to assist both the Applicant and the Examining Authority in refining mitigation and enhancement proposals to ensure that the Beacon Fen Energy Park can contribute positively to nature recovery in Lincolnshire. Please do not hesitate to contact me if you have any queries or need clarification regarding the comments provided.

Yours sincerely,



Conservation Office

References

1. Burns, F, Mordue, S, al Fulaij, N, Boersch-Supan, PH, Boswell, J, Boyd, RJ, Bradfer-Lawrence, T, de Ornellas, P, de Palma, A, de Zylva, P, Dennis, EB, Foster, S, Gilbert, G, Halliwell, L, Hawkins, K, Haysom, KA, Holland, MM, Hughes, J, Jackson, AC, Mancini, F, Mathews, F, McQuatters-Gollop, A, Noble, DG, O'Brien, D, Pescott, OL, Purvis, A, Simkin, J, Smith, A, Stanbury, AJ, Villemot, J, Walker, KJ, Walton, P, Webb, TJ, Williams, J, Wilson, R, Gregory, RD, 2023. State of Nature 2023, the State of Nature partnership, Available at: [redacted]