



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

The Examining Authority's first written questions and requests for information (ExQ1) - **NATURAL ENGLAND RESPONSE – ref 529213**

Issued on 01 October 2025 - **Response dated 17/10/2025**

The following table sets out the Examining Authority's (ExA's) first set of written questions and requests for information - ExQ1.

Questions are set out using an issues-based framework derived from the Initial Assessment of Principal Issues provided as annex C to the [Rule 6](#) letter of 12 August 2025. The questions have arisen from the ExA's consideration of the application documents and representations. The answers to them will help the ExA to consider the application against relevant legislation and policy.

Column 2 of the table indicates who each question is directed to. Please could each party answer all questions directed to them, providing a substantive response, or indicating why the question is not relevant to them. This does not prevent an answer to any question being provided by any party if it is relevant to their interests.

Each question has a unique reference number which starts with an alphabetical code and then has an issue number and a question number. For example, the first question on the draft Development Consent Order (dDCO) is identified as DCO.1.1. **When you are answering a question, please start your answer by quoting the question reference number.**

The meanings of abbreviations are set out in the List of Abbreviations below.

You should respond to the questions by using the **Have your say** function on the [project page](#) of the National Infrastructure website and selecting 'Responses to Examining Authority's First Written Questions (ExQ1)' when asked.

Download a copy of this Microsoft Word version of the ExA's written questions, enter your answers and save the document using an appropriate file name. You can then submit the completed document by choosing 'Make a comment' and selecting 'Upload files'.

Responses are due by Deadline 2 on Tuesday 21 October 2025.



Abbreviations used:

APs	Affected Persons	MW	Megawatts
Art	Article	NE	Natural England
ALA 1981	Acquisition of Land Act 1981	NH	National Highways
BMV	Best and Most Versatile	NKDC	North Kesteven District Council
BoR	Book of Reference	NPS	National Policy Statement
BNG	Biodiversity Net Gain	NSIP	Nationally Significant Infrastructure Project
CA	Compulsory Acquisition	OCEMP	Outline Construction Environmental Management Plan
CPO	Compulsory purchase Order	PA2008	The Planning Act 2008
dDCO	Draft DCO	PRoW	Public Right of Way
EA	Environment Agency	PV	Photovoltaic
EM	Explanatory Memorandum	R	Requirement
ES	Environmental Statement	RR	Relevant Representation
ExA	Examining Authority	SAC	Special Area of Conservation
Fig.	Figure	SPA	Special Protection Area
HLAs	Host Local Authorities	SI	Statutory Instrument
IPs	Interested Parties	SoS	Secretary of State
LIR	Local Impact Report	SUs	Statutory Undertakers
LNR	Local Nature Reserve	TP	Temporary Possession
LPA	Local Planning Authority	WMS	Written Ministerial Statement
MP Order	The Infrastructure Planning (Model Provisions) Order 2009		



The Examination Library

References in these questions set out in square brackets (eg [APP-010]) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the following link:

[Examination Library](#)

It will be updated as the examination progresses.



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ExQ1: 01 October 2025

Responses due by Deadline 2: Tuesday, 21 October 2025

ExQ1	Question to:	Question:	Natural England Response:
GCT.1.17	Natural England (NE)	The applicant states, in paragraph 4.1.1 of document 7.3 Biodiversity Net Gain Strategy [APP-280] that the proposed development is anticipated to provide a net gain of 36.43% in relation to habitat units, a 10.79% net gain in relation to hedgerow units and a 15.95% net gain in watercourse units. Can NE and the EA please confirm they are content with the applicant's calculations and the proposed net gain in relation to national policy and priorities?	Natural England has not undertaken a detailed review of the Applicant's calculations; however, we welcome the overall approach to Biodiversity Net Gain and acknowledge the commitment to delivering a minimum of more than 10%.
BIO.1.9	NE	Can NE confirm they are in agreement with the methodology and data used in relation to ecology/HRA matters and that the applicant's approach is to their satisfaction?	Natural England has reviewed the methodology, data, and the applicant's approach and finds them acceptable. We have no additional comments to provide.
BIO.1.13	Applicant	In relation to the Appropriate Assessment and Adverse Effects on Integrity, can the applicant and NE confirm, for the sites listed in HRA Report Table 1, the conservation status of those sites?	<p>It should be noted that condition monitoring data is primarily maintained for SSSI designations, which serve as the statutory foundation for site-based conservation in the UK. These designations provide the baseline for other layers of protection, such as SACs and SPAs, which typically overlap with SSSIs.</p> <p>Please see below a summary of the condition of the underlying SSSI designation, for which information on condition monitoring for The Wash is held.</p> <p><i>Feature Condition</i></p> <p>Natural England's Designated Sites View currently shows that 67.65% of monitored features are in favourable condition. A further 8.82% are classed as unfavourable but</p>

ExQ1	Question to:	Question:	Natural England Response:
			<p>recovering, while another 8.82% are unfavourable and declining. The remaining 14.71% have no recorded condition. A detailed breakdown of the condition of all features within The Wash SSSI can be accessed here.</p> <p><i>Unit Condition</i></p> <p>Natural England's Designated Sites View currently shows that 67.98% of monitored units are in favourable condition. A further 31.61% are classed as unfavourable but recovering, while 0% are unfavourable and no change. The remaining 0.41% are classified as unfavourable and declining, while 0% are partially destroyed. A detailed breakdown of the condition of all units within The Wash SSSI can be accessed here.</p> <p>Further information regarding the condition of SSSI features and units can be accessed on Natural England's Designated Sites View.</p>
BIO.1.15	Applicant NE	In relation to the Wash and North Norfolk Coast Special Area of Conservation (SAC) – Otter HRA report paragraph 5.2.11 sets out that horizontal directional drilling (HDD) is to be adopted at Heckington Eau and South Forty Foot Drain as a mitigation for LSE on otter qualifying species at the Wash and North Norfolk Coast SAC. Can the applicant set out how it has taken into	In this scenario, the functionally linked land (FLL) for otter refers primarily to the river and riparian habitat, which the Applicant is avoiding through the use of horizontal directional drilling (HDD). As a result, there will be no direct loss of FLL. While there is a minor potential for disturbance associated with the launch pits, this is considered unlikely, and no resting or breeding sites have been identified in the vicinity. Therefore, we agree that likely

ExQ1	Question to:	Question:	Natural England Response:
		<p>account any potential impacts of the launch sites for the HDD equipment in this mitigation measure?</p> <p>NE are requested to provide a view on the adequacy of this mitigation measure. Specific reference in its response should include, the impact of the launch sites and the security of the mitigation measure as currently drafted in the outline Construction Environmental Management Plan [APP-077].</p>	<p>significant effects on otter, a qualifying species of the Wash and North Norfolk Coast SAC, can be ruled out. Additionally, the proposed development site is located at a considerable distance from the SAC, approximately 14.2 km away with a significant amount of alternative habitat available.</p>
WFR.1.2	Applicant EA NE IPs	<p>In relation to the Wash SPA and Ramsar and the Wash and North Norfolk Coast SAC, paragraph 4.3.2 sets out that “Measures to contain pollutants and avoid them entering the water courses have been set out in the OCEMP (Document ref 6.3 ES vol 2, 6.3.7) in particular Section 4.5. A minimum 5 m buffer will be maintained from all water courses. The hydrological regime has been considered in the OCEMP section 6.11, and water levels are maintained by the Internal Drainage Board.”</p> <p>The ExA seeks views from the EA, NE and other IPs as to whether the information provided in the oCEMP in relation to monitoring provides sufficient detail and therefore security to be relied upon to inform the final CEMP.</p>	<p>It is Natural England’s view that while the Outline Construction Environmental Management Plan (oCEMP) does not provide extensive detail on monitoring, it includes sufficient information and clear commitments to demonstrate that appropriate monitoring measures will be implemented. Although these measures are not explicitly set out in full, the content of the oCEMP provides adequate assurance that monitoring requirements have been secured.</p>