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Date: 21 November 2025

Dear Sir/Madam

Application by Beacon Fen Energy Park Limited for an Order Granting Development Consent for the Beacon Fen Energy Park Project
Deadline 4 Submissions for Lincolnshire County Council (LCC)

Post Hearing Submissions

Written summaries of the Council's oral submissions at ISH 2 and 3 are attached as Appendix A to this letter.

LCC's post hearing comments and response to action points are set out below:

Ecological Steering Group (ESG)

At ISH2 the ExA requested from LCC a form of words on how the proposed ESG could be secured. Please see paragraph 16 of Appendix A for further details and examples as referred to in our oral evidence at ISH2.

LCC has shared a sample Terms of Reference with the Applicant after ISH2. Discussions are ongoing between the Applicant, North Kesteven District Council (NKDC) and LCC regarding an associated financial contribution for the operation of the ESG and BNG monitoring.

Solar PV panel replacement and provision of waste forecasts

We note ISH3 action point 5 for the applicant to consider control provision on operational waste management in response to submissions made by LCC and NKDC.

A request was also made to LCC and NKDC at ISH3 to agree on wording that addresses concerns regarding the replacement of solar panels and notification of waste arising forecasts to the Waste Planning Authority.

Notwithstanding LCC's position outlined in oral submissions at ISH3, as summarised in paragraph 18 of Appendix A and in our LIR [REP2-044] and Deadline 3 response [REP3-009], which recommends including a DCO requirement to limit panel replacement and require notifications to the relevant planning authority, which remains our preferred control measure—LCC suggests incorporating wording similar to Section 2.10 (Replacement Schedule) of the draft outline Operational Environmental Management Plan (oOEMP) submitted for the Springwell Solar DCO [EN010149-000930-Springwell Energy Farm Limited - Outline Operational](#)

[Environmental Management Plan \(Clean\).pdf](#) be included in the Beacon Fen DCO documents. This approach has been discussed and agreed with NKDC.

However, as noted in paragraph 15.19 of our LIR [REP2-044], we would have anticipated the inclusion of oOEMP within the Beacon Fen DCO. In response to paragraph 15.19, the applicant states that *'The operational phase will be accounted for in the Site Waste Management Plan (SWMP).'* As the DCO application documents currently do not include an oOEMP or a SWMP, we would welcome further discussions with the applicant on how these requirements can be appropriately secured and would encourage the submission of an OEMP.

Protection of Trees and Hedgerows

Further to LCC's oral submission at ISH3 as summarised in Appendix A, paragraph 19.

LCC are of the opinion that the outline Landscape and Ecological Management Plan (oLEMP) could be strengthened through the inclusion of plans and documents referenced in the oLEMP as an appendices. For example (but not limited to) paragraph 2.4.1 refers to Figure 6.32 Vegetation Removal Plan (Document Ref: 6.4 ES Vol.3, 6.4.43) and the Vegetation Removal Schedule (Document Ref: 6.4 ES Vol.3, 6.4.43). Multiple paragraphs (e.g. 2.6.3, 2.6.10, 2.6.15) refer to Figure 6.31: Landscape Strategy Plan (Document Ref: 6.4 ES Vol. 3, 6.4.42).

We acknowledge NKDC's submission at Deadline 3 [REP3-010] and support their recommendations to include a clause in the oLEMP requiring the replacement of TPO trees if required by the local authority. Additionally, we agree that an annual maintenance schedule should be submitted, detailing any tree removals and whether replacements are planned. This aligns with the approach taken for the Springwell and Tillbridge solar schemes, where a replacement schedule was incorporated within the oOEMP.

Public Rights of Way (PROW)

Comments on outline Public Rights of Management Plan (oPRoWMP) [REP2-039] received at Deadline 2 and applicant's response to LCC's LIR

Following our Deadline 3 submission [REP3-009], when comments from LCC's PROW Officers were not yet available, the oPRoWMP has now been reviewed, and the following feedback is provided, notwithstanding LCC's concerns and objection to the closure of routes during the construction period, as set out in our LIR, Section 13 [REP1-044].

The oPRoWMP has been produced in consultation with LCC's Countryside Service and the provision of a new footpath bridge to link Ewerby to South Kyme is particularly welcome. However, we note it is proposed to be decommissioned at the end of the development. To provide lasting benefits to the network we would wish to see this bridge crossing retained in perpetuity.

There are some points of detail that LCC would wish to see clarified/added to the oPRoWMP and further recommendations are set out below:

LCC has a system in place for ensuring the PROW closures through the Development Consent Order process are fed in to OneNetwork and that publicity is undertaken. LCC therefore request that closures are notified to the authority in advance, to facilitate this process. We suggest that additional text is included in the oPRoWMP to require this.

We would also wish to see commitments in the oPRoWMP to notify the Council in advance prior to any changes being made on site, to ensure that any temporary closures are kept to the minimum time frame required for works to be undertaken, to ensure that any temporary diversions are agreed with the Council in advance, particularly with regard to path surfacing and signage, and that adequate and satisfactory reinstatement of the original paths are undertaken at the end of the construction works.

Inclusion of the measures outlined above in the oPRoWMP would in part address the concerns we raised in our LIR [REP1-044] regarding the powers in Article 16 in the dDCO [REP2-004]. We would welcome further discussions with the applicant on the final drafting of the oPRoWMP.

Yours faithfully,

[Redacted Signature]

For Neil McBride

Head of Planning

Appendix A

Appendix A

Beacon Fen Energy Park DCO

Application by Beacon Fen Energy Park Limited

POST HEARING SUBMISSIONS
ON BEHALF OF LINCOLNSHIRE COUNTY COUNCIL
AT DL4

Introduction

1. Lincolnshire County Council (“LCC”) attended the Issue Specific Hearings (ISH2 and ISH3) held on 12th and 13th November 2025 respectively. A summary of LCC’s oral representations for both hearings appears below.

ISH2

Item 3 - BESS

2. As indicated at the hearing event, LCC is seeking technical assistance with the points raised by the applicant in relation to the connection between MW capacity and physical scale of the BESS proposed. It remains LCC’s view that in relation to stated capacity in the form presented by the Applicant (i.e. MW) the BESS is not subordinate to the solar generating station – it is larger.
3. LCC notes that MW is a value relevant to the rate at which power is transferred rather than a measure of physical scale or necessarily planning impacts. However, that is the unit of measurement used by the Applicant in the presentation of its application for development consent. It is notable that other solar DCOs in Lincolnshire have capped the MW capacity of the BESS at the same or less than the MW capacity of the solar panels. LCC will endeavour to update the ExA on its position as soon as possible.

Item 4 - Landscape and Visual

4. Under Agenda Item 4 Landscape and Visual, the agenda was broken down into seven key matters, and the ExA used these to focus questioning in the hearing towards the applicant. Following running through the first six key matters of Agenda Item 4, at key matter seven the ExA provided the opportunity for the Host Authorities to comment on any issues raised so far.

Subsequently, we provided an overall summary of our comments on both the landscape and visual matters relating to the scheme and submission, as well as specific issues raised at this hearing. We were subsequently invited to identify any additional key matters that we wanted to address with the applicant at this hearing.

5. We initially clarified that a detailed LVIA review has been carried out, which has been appended to the NKDC and LCC LIRs. This review provides clarity on our position and where we have additional questions and queries on the submission, as well as areas where we currently have disagreement with the judgements. We went on to clarify that a meeting has been arranged between the applicant and two host authorities of NKDC and LCC. This is to be held on the 20th November 2025 and the agenda will cover key issues we have identified in our detailed review, where further clarifications are required, and will also likely cover matters discussed at the hearing. The outcome of this meeting will feed back into the evolving SoCG.
6. In regards to a provision of an overall summary of our comments on both the landscape and visual matters relating to the scheme; our position is that by virtue of its scale and massing, the Development would result in Significant adverse effects on local landscape character and visual amenity during all key phases (construction, early operation, and at year 15). The proposals would fundamentally alter the character of the site and its surroundings, replacing open, agricultural fields with extensive solar infrastructure. This represents a substantial alteration to land-use and long-term change to the openness, tranquillity, and rural character of the area.
7. As well as the scheme in isolation, we have a concern regarding both the change to the baseline landscape and also cumulative landscape effects: as identified at the statutory consultation stage, we have concerns regarding cumulative effects on the landscape at a wider district and regional scale. The mass and scale of several NSIP energy projects combined has the potential to lead to adverse effects on landscape character over an extensive area across multiple published character areas. The landscape character across the Nottinghamshire and Lincolnshire County areas will be altered by multiple schemes over their operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that is predominantly agricultural. While it is not suggested that agriculture will not remain as a defining characteristic, over a short period of time large scale solar will undoubtable become a widespread characteristic in the region. Subsequently, we judge that solar development would be a key characteristic in any updates to published character assessments from local to national scale.

8. However, given the absence of a unified, county-wide landscape character baseline across Lincolnshire, this presents a challenge when assessing cumulative effects of the scheme and how this additional development to those identified would change the assessed effect. Therefore, an approach we are promoting is to extract common landscape attributes of the area from the multiple character area assessments that cover the region, enabling a reasoned, evidence-led baseline, and subsequently assessment, of cumulative landscape effects across the wider area. For example, across Lincolnshire and east Nottinghamshire: the Land Use is strongly rural and predominantly arable farmland; Field Patterns are predominantly medium to large-scale; the Topography has a predominantly flat to gently undulating landform; Perceptual Qualities are predominantly quiet and with a rural character and high levels of tranquillity; the Settlement Pattern is generally dispersed villages and market towns; Vegetation & Tree patterns are generally open with sparse or isolated tree or woodland cover; and regarding Views & Openness, there is generally a strong sense of openness, big skies, and long expansive views. Therefore, across the region of Lincolnshire, based on these shared characteristics large scale solar development and new energy infrastructure would create cumulative change of the landscape character through an extensive Land Use change, directly affecting the perceived openness, and rural tranquillity. We judge large scale solar, battery and energy infrastructure will subsequently become a distinctive key characteristic across the region as a whole. This scheme will contribute to this regional change.
9. In regards to identification of key matters that we wanted to address with the applicant at this hearing; we provided six key points as follows:

Key Point 1: We identified that the process of assessing baseline Landscape and Visual Susceptibility and subsequently Sensitivity are not apparent in the LVIA, and we requested the applicant provide clarity as to where these sections were located and how these judgements have been made. We also noted that no Value or Susceptibility assessment for individual visual receptors could be located: only a final judgement of Sensitivity within Appendix 6.4. The applicant identified the locations where this information is available and we will discuss this further with the applicant at a focussed landscape and visual meeting to ensure the information identified is appropriate;

Key Point 2: ES Table 19.2 concludes residual significant landscape effects are limited to those at a Site-level, but we consider the broader character area (Fenland character area) would still subject to long-term significant adverse change (refer to AAH LVIA Review para. 4.13): Even with mitigation planting in place, the scheme is still a direct, large scale land use change across all fields in which above ground infrastructure is proposed. Open agricultural

fields are a key component of this landscape, and subsequently this landscape receptor would maintain a residual moderate adverse effect which would be significant;

Key Point 3: We identified a concern regarding mitigation planting causing adverse effects, particularly to open views. However there are several instances of this being assessed within the LVIA as reducing the Significance of visual effects through screening. Mitigation planting can be an effective way to screen development proposals and add valuable landscape and ecological elements; but this mitigation planting needs to be carried out in a way that is sensitive to the existing landscape character and views. As demonstrated on photomontages associated with the RVAA, existing open views across a rural landscape will be affected initially by the development, then at the residual stage once planting has matured. These open rural views will be drastically foreshortened by both the development and the maturing planting. The outlook for residential receptors will be completely altered from the existing, or baseline view. The view and photomontages from Howell Fen Farmhouse that was displayed and discussed at the hearing is an example of this.

We also queried as to whether there was additional scope to increase embedded mitigation by moving development further from visual receptors, particularly residents of nearby properties, but also PROW users would benefit from larger offsets.

Key Point 4: We have identified concerns regarding the proximity to several properties to above ground development, but also, as identified above, the screening effects of established mitigation. In particular: R1 Group Receptor: Eweby Thorpe Farm; and Ewerby lodge; R2 Group Receptor; Howell Fen Farmhouse; Asgarby Barns; and Westmorelands Farm; R4 Gashes Barn (RVAT reached); R20 Group Receptor; Crown Cottage; and Keepers Cottage. These properties appear very close to the development and offsets appear to be minimal. Of particular concern is R4 Gashes Barn, where significant visual effects are identified, as well as this property reaching the Residential Visual Amenity Threshold (RVAT). The RVAT is a very high bar to reach for private views, and demonstrates the extent of change in view from this property and limited consideration in regards to the layout and embedded mitigation. We queried as to whether the applicant could review the offsets from this property to lessen the significance of effect for residents;

Key Point 5: The development of solar farm projects and energy infrastructure in the region is not acknowledged to be a factor in the future baseline within the LVIA. This is a landscape undergoing an extensive change to land-use, from agriculture to renewable energy and energy infrastructure. There are several projects already approved, and several in the planning system. These include Solar, BESS, Grid upgrades, Sub-stations and flexible generation facilities at both an NSIP DCO and TCPA scale.

Key Point 6: No Significant landscape or visual cumulative effects are identified in the LVIA. However, we have concerns regarding cumulative effects due to the unprecedented number and extent of renewable energy projects and associated infrastructure in the region. The mass and scale of several NSIP scale energy projects, along with planned National Grid projects, combined with Beacon Fen will likely lead to adverse effects on landscape character over an extensive area across multiple published character areas (refer to point above for additional information). We acknowledge that the initial list of cumulative projects identified at the statutory consultation stage have been considered within the LVIA, however the baseline is constantly changing with additional schemes coming online regularly (illustrating the pressure this landscape is under from renewable and energy development) and an updated list of nearby projects is being provided to the applicant to consider.

Item 5 - Historic Environment

10. Under agenda item 5 LCC elaborated on its concerns regarding the assessment of Farmsteads in the ES. The assessment fails to capture the collective setting and coherence of historic farmsteads that define the rural landscape. LCC requested a grouped assessment of receptors in relation to historic farmsteads, including both designated and non-designated assets. This would provide parity with other NSIP projects in the county that have undertaken similar work. LCC welcomed the applicant's commitment at the hearing to undertake a collective assessment.
11. LCC also expressed its concerns regarding the setting impacts and level of harm on Kyme Tower and Church of St Mary and All Saints. LCC does not agree with the applicant's conclusion that the magnitude of impact is low. The fenland setting is integral to the significance of both assets and LCC considers the impact to represent a moderate effect. LCC requested further assessment work for Kyme Tower, namely a terrain model /ZTV from the top of the tower. LCC welcomed the applicants commitment at the hearing to undertake a ZTV assessment.

Item 6 - Biodiversity and Ecology

12. Under Agenda item 6 Lincolnshire County Council ("LCC") made the following points:
13. LCC welcomed the Applicant's stated intention to include the delivery of specific Biodiversity Net Gain percentages on the face of the DCO.
14. LCC re-stated concerns expressed in the Local Impacts Report and at Deadline 3 relating to the predicted permanent negative impact on ground nesting bird species. Species affected will include skylark and meadow pipit which have been recorded on the application site but also

potentially lapwing, grey partridge and quail which have been recorded in the wider area. LCC acknowledged that the Applicant's habitat creation and enhancement proposals may provide benefits for the wider farmland bird assemblage in the form of enhanced foraging opportunities but stated that concerns are specifically in relation to reduction in nesting opportunities for ground nesting species. LCC stated that this issue is of particular concern given the number of other solar developments in the county which all potentially have the same type of impact.

15. LCC requested an update on the Applicant's position in relation to a proposed Ecological Steering Group (ESG). The Applicant had previously indicated that they were open to the potential establishment of such a group but there had been no further action on this matter.
16. LCC confirmed to the ExA that similar arrangements relating to the establishment of an ESG had been agreed with both the Outer Dowsing Offshore Wind application and the Springwell Solar Farm application. In the case of Outer Dowsing, the ESG and a financial contribution related to monitoring will be secured via a s106 agreement with LCC. In the case of Springwell, a Terms of Reference for the ESG is set out in the oLEMP. An associated financial contribution will be secured via a s106 agreement with both LCC and North Kesteven District Council.

ISH3

Item 3- Development Consent Order

17. LCC maintains its position that it would be appropriate to cap the percentage of panels that could be replaced under the powers to "maintain" the DCO at 5% in the terms and for the reasons provided by the ExA in the Springwell DCO examination. LCC set out its position at Deadline 3 on this matter.
18. Further, regardless of the position in the DCO as to a cap on panel replacement, LCC is strongly of the view that the Applicant should be required to commit to annual reporting of waste arising and projections for future waste needs to assist with waste planning in the County. LCC would encourage the inclusion of a requirement for the undertaker to submit an Operational Environment Management Plan for approval of the relevant waste planning authority which should include a commitment to submit annual reports on waste arisings and forecasts covering the type, quantity, and proposed fate of waste to the waste planning authority.
19. In relation to Article 44 and provisions in relation to trees. LCC would welcome an update to the OLEMP which included an express assurance that the undertaker would take reasonable endeavours not to fell any tree outside those identified for removal unless operationally required. LCC also requests that figures which are incorporated by reference into the OLEMP

are actually brought within that document to provide certainty and clarity without the need for a future reader to cross refer back to the ES.

20. In relation to articles 11 and 13, LCC encourages the inclusion of additional text within the CTMP along the lines of that agreed to be included in the CTMP for the Springwell DCO as follows:

“5.4. Delivery of Road Modifications

5.4.1. Prior to any construction works being undertaken within the limits of highway adoption, the detailed design of these works must be submitted to the Lincolnshire County Council for approval. These submissions will include:

- A programme for the works, details of the construction method and traffic management requirements;*
- A detailed design pack of drawings and specifications detailing the works and any service / utility works that may need to be accommodated;*
- The necessary health and safety information required under the Construction, (Design & Maintenance) Regulations, or their equivalent at the point of submission;*
- Details of the proposed contractor, including their insurance provisions;*
- If required by the local road authorities, a Road Safety Audit (RSA) to a combined Stage 1 and Stage 2 standard;*
- Details of any necessary road signage and road markings; and*
- Details of any proposed remediation proposals should the works not be permanent.*

5.4.2. The Applicant will reimburse the highway authorities for the technical approval process at the time the applications are made, in line with costs for similar Section 278 or Section 184 applications made under the Highways Act.

5.4.3. The finalised CTMP will detail the exact process for these technical approvals.”

Item 4 – Land Use

21. LCC considers that the list of projects assessed for likely significant cumulative effects should be updated.

22. In relation to land use and loss of BMV, LCC notes that the equivalent percentage calculated by the applicant for the One Earth solar DCO which is proceeding along a similar timeframe to this examination and also represents a solar DCO project in Lincolnshire tasked with calculating cumulative loss of BMV, has calculated this percentage as 6.54% of BMV land to be lost in Lincolnshire if pipeline projects are delivered. This represents a strikingly larger figure than that presented by this Applicant and LCC requests an update to the figure and to see additional inputs into the calculation so that a true comparison can be made. A similar request has been made of the One Earth applicant.
23. LCC notes that loss of BMV is not merely academic and has knock on implications for the wider agricultural economy and therefore socio economic factors more broadly. Such matters are not assessed in ES Chapter 15.

Item 5 – Water Environment and Flood Risk

24. LCC considers the sequential test information is lacking in detail. For instance, whilst a broad range of factors are set out, it is not possible to tell from the site selection information why the particular alternative sites were located. For example, site 1 is located 50% in flood zones 2 and 3 whereas land to the immediate west is located in flood zone 1 and is not very apparently constrained by other factors. Site 2 is discounted in part due to size but it is not very clear as to why the boundaries have been drawn in that location when other apparently unconstrained land exists surrounding site 2.

Item 6 – Cumulative Effects

25. LCC maintains its position as set out within its LIR [REP1-044] and DL3 representations [REP3-009] that waste is a likely significant cumulative effect that has not been assessed. LCC considers that forecasting is needed in order to allow LCC to properly plan for the waste arising from this and other solar developments in Lincolnshire that are all likely to experience breakages during construction, panel failures during extreme weather and be decommissioned at around the same time.