



By email to:

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Date: 12 January 2026

Dear Sir/Madam

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

This letter sets out Lincolnshire County Council’s (LCC) comments on the additional information and submissions received at Deadline 5.

Landscape and Visual

On behalf of Lincolnshire County Council (LCC), and North Kesteven District Council (NKDC), AAH Consultants has reviewed the relevant Landscape and Visual elements of the Deadline 5 (DL5) submissions of the Beacon Fen Solar Farm Application to provide comments to be incorporated within statements from both LCC and NKDC.

Following ISH2 held on 12th November 2025, a meeting was held on the 20th November 2025 between the applicant and two host authorities of NKDC and LCC. The agenda covered key issues we have identified in our detailed review, where further clarifications are required, and also covered matters discussed at ISH2. Following this meeting, AAH issued a series of actions and clarifications, that were agreed at the meeting, on 03rd December 2025 via email. Subsequently the applicant issued a response to these individual points on 15th December 2025. The outcome of the meeting on the 20th November, and subsequent

actions, clarifications and responses have fed into the DL5 updated information and will subsequently feed back into the evolving Statement of Common Ground (SoCG).

Key documents from DL5 that we have reviewed are:

- Document Ref 6.2.6: ES Chapter 6 Landscape and Visual (Revision 2) (Clean)
- Document Ref 6.2.6: ES Chapter 6 Landscape and Visual (Revision 2) (Tracked)*
- Document Ref 6.3.16: ES Appendix 6.4 Visual Assessment (Revision 2) (Clean)*
- Document Ref 6.3.16: ES Appendix 6.4 Visual Assessment (Revision 2) (Tracked)*
- Document Ref 6.3.17: ES Appendix 6.5 Residential Visual Amenity Assessment (Revision 2) (Clean)*
- Document Ref 6.3.17: ES Appendix 6.5 Residential Visual Amenity Assessment (Revision 2) (Tracked)*
- Document Ref 6.3.19: Outline Landscape and Ecological Management Plan (Revision 3) (Clean)
- Document Ref 6.3.19: Outline Landscape and Ecological Management Plan (Revision 3) (Tracked)
- Document Ref 9.18: Applicant's Responses to Remaining Action Points
- Document Ref 9.19: Applicant's Responses to Other Parties D4 Submissions
- Document Ref 9.20: Applicant's Responses to ExQ2

* Following the submission of information at DL5, the ExA have subsequently accepted some late DL5 submissions from the applicant on the 7th January 2026, relating to landscape:

- Updated 6.2.6 Chapter 6 Landscape and Visual (Revision 2) (Tracked) - Late Submission accepted at the Discretion of the Examining Authority
- Updated 6.3.16 Appendix 6.4 Visual Assessment (Revision 2) (Clean) - Late Submission accepted at the Discretion of the Examining Authority
- Updated 6.3.16 Appendix 6.4 Visual Assessment (Revision 2) (Tracked) - Late Submission accepted at the Discretion of the Examining Authority
- Updated 6.3.17 Appendix 6.5 Residential Visual Amenity Assessment (Revision 2) (Clean) - Late Submission accepted at the Discretion of the Examining Authority
- Updated 6.3.17 Appendix 6.5 Residential Visual Amenity Assessment (Revision 2) (Tracked) - Late Submission accepted at the Discretion of the Examining Authority

Comments on the Updated 6.2.6 Chapter 6 Landscape and Visual (Revision 2)

As clarified in email correspondence from the applicant on 15th December 2026: *The Applicant can confirm that the LVIA (Chapter 6 Landscape and Visual (APP-057)) represents a worst-case scenario assessment, has considered the clarifications provided in the Landscape Institute technical guidance note LITGN-2024-01 and that the photomontages included as part of the*

ES represent the maximum design parameters. This provides appropriate clarification, and we have no further comments in regards to these matters in relation to the updated LVIA in Chapter 6 of the ES.

We maintain our position, as identified in our detailed LVIA review (appended to the LIR), as discussed at ISH2 and applicant meeting on 20th November, and within the correspondence on actions and clarifications following this meeting, that: The broader landscape character area (Fenland character area) would still be 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 character area and these will be replaced with development, and subsequently this landscape receptor would maintain a residual Moderate Adverse effect at Year 15, which would be significant. This is in disagreement with the applicants' position and updated LVIA, and this will be reflected in the next revision of the SoCG as an area of disagreement.

Paragraph 6.3.20 of the updated LVIA identifies Stockpiles at 0.5 to 1.0m in height adjacent to the bespoke access road. There are two concerns in regards to these features:

1. The bunding would be out of character in this landscape and would likely appear as an engineered feature. This is a relatively flat, open landscape, and bunding such as that proposed would potentially be conspicuous in views and out of character with the existing landscape. We do however acknowledge that these are currently proposed as relatively low features, lessening their presence in views. Paragraph 6.6.57 of the LVIA has been updated to consider these new features, however we disagree that these elements will harmonise with the immediate context of the agricultural landscape as they will likely appear as engineered elements out of character with the existing landscape character and in themselves have the potential to have adverse landscape and visual effects; and
2. A topsoil stockpile for use decades later is not likely to be effective. We would welcome clarification from the applicant in this regard and a maintenance process that would maintain the topsoil integrity, but topsoil stockpiles are typically in place for a relatively short amount of time, usually 6 to 36 months. The characteristics of the soil are likely to change over a protracted period of time when in a stockpile, and in our experience unlikely to be useable.

The future baseline section of the LVIA has been updated to acknowledge, in paragraph 6.5.67, that energy infrastructure has increasingly characterised the southern part of the Study Area, and paragraph 6.5.68 acknowledges the increased demand for renewable energy development which may progressively influence landscape character at a county level. These updates reflect our position and comments made in the detailed LVIA review within the LIRs

that this is a landscape undergoing change and is under pressure from renewable energy and energy infrastructure.

We maintain our position, as identified in our detailed LVIA review (appended to the LIR), as discussed at ISH2 and applicant meeting on 20th November, and within the correspondence on actions and clarifications following this meeting, that: 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 undoubtedly 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. This is in disagreement with the applicant's position and updated LVIA in Chapter 6 of the ES, and will be reflected into the next revision of the SoCG as an area of disagreement.

AAH requested that the applicant review inconsistencies identified between assessment appendices and main LVIA chapter, and that these are subsequently rectified as track changes in updated LVIA chapter. Paragraph 6.10.16 of the updated LVIA has removed two receptors as part of this process, and we have assumed all other changes are reflected within the LVIA appendices. We would request that the applicant confirm all inconsistencies between tables/appendices and main LVIA text correlate.

Comments on the Updated 6.3.16 Appendix 6.4 Visual Assessment (Revision 2)

Following a request that the applicant review inconsistencies identified between assessment appendices and main LVIA chapter we note several updates to Magnitude and subsequent Significance of effect have been made to the assessment tables. We have reviewed and the inconsistencies appear to have been remedied, but we request that the applicant confirm all inconsistencies between tables/appendices and main LVIA text now fully correlate.

Comments on the Updated 6.3.17 Appendix 6.5 Residential Visual Amenity Assessment (Revision 2)

The changes to the updated RVAA are minimal, with the following which we have assumed is to remedy any inconsistencies, rather than address specific consultee comments:

- **R10 White House Farm** Construction effects amended to be Major adverse (previously Moderate); and
- **R11 Poplar Tree Farm** Y15 effects amended to be Minor adverse (previously Negligible)

We maintain our position, as identified in our detailed LVIA review (appended to the LIR), as discussed at ISH2 and applicant meeting on 20th November, and within the correspondence on actions and clarifications following this meeting, that: concerns regarding the proximity to several properties to above ground development, but also, as identified previously, 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 are very close to the development and offsets appear to be minimal. While the RVAA identifies significant effects at Year 0 for these receptors, they are all assessed to reduce in level of effect at Year 15 through the establishment of mitigation planting, with R1, R2, and R20 judged to reduce so that effects are not significant. We disagree with this assessment, and while we acknowledge that established planting will screen the proposals to a degree, the openness and extent of the existing view is completely changed with the planting and panels drastically foreshortening views resulting in a large scale change across the extents of the view, and subsequently the residual Year 15 effects on these receptors would remain Significant. This is in disagreement with the applicant's position and updated LVIA in Chapter 6 of the ES and associated Residential Visual Amenity Assessment (Appendix 6.5), and this will be reflected in the next revision of the SoCG as an area of disagreement.

Comments on the Outline Landscape and Ecological Management Plan (Revision 3)

No further comments on Revision 3 of the OLEMP.

Comments on Document Ref 9.18: Applicant's Responses to Remaining Action Points

In regards to Action Number 6 and the information presented within **Appendix 3: ISH2 Action Point 6 of Applicant's Responses to Remaining Action Points** to: *Clarify the applicant's overall approach to landscape and visual effects particularly how the applicant has taken into consideration the effects of the proposed mitigation on landscape and visual receptors, particularly how the applicant has considered changes brought by the proposed mitigation.*

We maintain the position that mitigation planting itself will cause adverse effects, particularly to open views. There are several instances within the LVIA where mitigation planting is assessed as reducing the Significance of visual effects through screening, and while we agree mitigation planting can be an effective way to screen development proposals and add valuable landscape and ecological elements; 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 were displayed and discussed at ISH2 are an example of this. This is in disagreement with the

applicant's position and updated LVIA in Chapter 6 of the ES and associated Residential Visual Amenity Assessment (Appendix 6.5), and this will be reflected in the next revision of the SoCG as an area of disagreement.

Comments on Document Ref 9.19: Applicant's Responses to Other Parties D4 Submissions

No further comments on the Applicant's Responses to Other Parties D4 Submissions as the key points and subsequent responses have been addressed in the comments above.

Comments on Document Ref 9.20: Applicant's Responses to ExQ2

No further comments on the Applicant's Responses to ExQ2 as the key points have been addressed in the comments above.

Ecology

Draft Development Consent Order (REP5-003)

The Council welcomes the commitment to the establishment of the proposed Ecological Steering Group and its funding and the funding of planting in Boston Borough Council's administrative area which the applicant is proposing through the amendment of Requirement 7 (2a) and Requirement 7 (2b).

However, the Council has previously stated the preferred mechanism for securing this funding would be through a s106 agreement, the Council continues to hold this preference. The Council considers the s106 mechanism for securing ESG funding would be consistent with the approach taken with other NSIP proposals, such as Springwell Solar Farm, whose draft s106 agreement includes the ESG/BNG monitoring fee.

Outline Construction Environmental Management Plan (oCEMP) (REP5-017)

The Council notes updates to the oCEMP in relation to birds at 6.7.12 and in relation to fish including eels at 6.7.15 - 6.7.16.

Outline Landscape and Ecological Management Plan (oLEMP) (REP5-025)

The Council notes the updates made in REP5-025 and has the following comments to make:

- Additions in 1.5.11 and 1.5.14 in relation to scarce arable flora are welcomed.
- The draft terms of reference for the Ecological Steering Group and its funding at 1.6.49 - 1.6.59 are welcomed. The Council suggests that a further point is added to the draft terms of reference which stipulates when the ESG should be formed / disbanded should be included and has provide the Applicant with a suggested form of words relating to this.
- The commitment to providing funding for offsite planting in Boston Borough Council's administrative area at 1.6.60 is welcomed

Chapter 7: Ecology (Revision 3) (REP5-013)

The Council notes the updates made in REP5-013 and has the following comments to make:

- The Council welcomes the clarification provided in 7.4.9 regarding the adoption of a ‘Rochdale Envelope’ approach.
- The Council notes that a permanent low level adverse impact on local skylark populations is still predicted. The Council remains concerned about potential for cumulative impacts on skylark populations given the number of other solar developments in the county which have the potential to reduce the area of nesting habitat available for the species.
- The Council welcomes confirmation of mitigation arrangements for water vole provided at 7.7.13 to 7.7.14.

Biodiversity Net Gain Strategy (Revision 3) (REP5-070) and Biodiversity Net Gain Metric (REP5-039)

In response to the Applicant’s submitted change request, the Council stated:

“...given that additional areas of habitat are likely to be removed under the Proposed Change, the Council considers that the Applicant's BNG Strategy (REP2-029) and the underlying post-development Statutory Biodiversity Metric (REP2-031) calculations will need to be reviewed and updated accordingly to ensure they take account of this.”

REP5-013 Para 7.4.9 (and elsewhere in the document) states that it has been assumed that a waterbody within Bicker Fen substation will be removed. It does not appear that REP5-070 or REP5-039 have been updated to account for the BNG implications of the change request.

Notwithstanding the above comment, the Council notes the updates made in REP5-070 and REP5-039 and has the following comments to make:

- The Council notes the updated predictions for the levels of BNG to be delivered of 33.2% area habitat units, 10.79% hedgerow units and 15.95% watercourse units.
- The Council also notes that the trading rules in the metric are now being met and welcomes this.
- Given the Applicant’s commitment to establishing an Ecological Steering Group (ESG) which will help to oversee the monitoring of BNG delivery, 6.1.2 of (REP5-070) could usefully refer to reports being submitted to the ESG.

Summary of current LCC position in relation to Ecology and BNG

In general, The Council considers that details now included in the application in relation to ecology are adequate and that appropriate mitigation measures are set out and will be appropriately secured for most impacts. However, the Council remains concerned about the level of mitigation provided for ground nesting farmland birds, principally skylark, and the potential for cumulative impacts from other developments in the county with similar impacts.

In relation to BNG, the Council considers that the current level of BNG predicted to be delivered by the development is acceptable and that its delivery will be appropriately secured. However, the Council is of the opinion that the BNG assessment does not yet properly take account of the Applicant's submitted change request and therefore considers that the additional updates to the BNG assessment and metric are still required.

The Council welcomes the Applicant's commitment to the establishment and funding of an Ecological Steering Group which will oversee the delivery of ecological mitigation and enhancement measures as well as the delivery of BNG.

Protection of Trees and Hedgerow

Outline Landscape and Ecological Management Plan (oLEMP) (REP5-025)

The updates to the oLEMP at paragraphs 1.3.5, and 1.4.5 to clarify that the final proposals for vegetation removal must be in accordance with the Vegetation Removal Plan, paragraph 1.6.21 regarding TPO tree's and replacement planting and 1.6.46 regarding the submission of an annual monitoring reports are welcomed. The updates primarily address the Council's concerns about the DCO drafting in respect of the removal of trees and replacement planting expressed at ISH3. We note that applicant in its response to LCC's deadline 4 submission (REP5 –047) does not consider it practical to append the plans as requested in our deadline 4 submission (REP4-030).

Archaeology

Whilst the Council are content that provision for appropriate and fit for purpose archaeological mitigation has been included within the documentation agreed, there are some slight concerns over the general lack of coverage of these requirements in other topic management plans. The historic environment is included within the oCEMP and oDEMP albeit the Archaeological Clerk of Works (ACoW) is not specifically mentioned within these documents. The Applicant confirmed this would be rectified in an email exchange dated 30th and 31st October but it has yet to be done within the documents themselves. The Council would request that this change is made for review at the next deadline.

Overall, the Council is satisfied that the Applicant has appropriately considered the potential for, significance of and impact to the archaeological resource within the footprint of the scheme. The investigations to date have been sufficient to design an Archaeological Mitigation Strategy (AMS) and committed to appointing an ACoW to oversee the daily construction work and monitor the operational and decommissioning phases. The Council considers that these commitments have secured the appropriate mechanism for managing the archaeological resources within the site on a long-term basis and will ensure appropriate and fit for purpose mitigation during the lifespan of the project. The Council looks forward to working with the Applicant on forthcoming archaeological evaluation and

mitigation measures and designing an effective programme of public engagement as part of the public archaeology and community engagement strategy.

Built Heritage

Beacon Fen Energy Park Kyme Tower Action Point 8

The Council welcomes the Applicant's supplementary heritage appraisal of Kyme Tower and acknowledges that it provides a clearer and more detailed discussion of the asset's significance and its relationship to the historic cluster at South Kyme. The Council broadly accepts the Applicant's conclusion that the Proposed Development would result in less than substantial harm to the significance of this asset.

However, the further work does not fully address the Examining Authority's Action Point 8 in methodological terms. While the report includes a series of photographic plates, it does not include any mapped or modelled analysis (for example, a ZTV or similar desk-based intervisibility study) to demonstrate where the Proposed Development could theoretically be visible from different levels of the tower. As a result, the assessment of potential visibility and the conclusions on the level of harm rely on a limited set of currently available viewpoints and are expressed largely in descriptive rather than analytical terms.

The assessment also places some reliance on the tower's current access arrangements and physical condition when considering views from the upper levels. While these constraints are understood, they should not be assumed to be permanent and the long-term appreciation of the asset and its setting should not be assessed solely by reference to present-day access or condition.

In the Council's view, the absence of a ZTV or similar analysis at the height of the former floor levels and the top of the tower means that the potential extent of intervisibility has not been explored in a fully systematic way. The assessment of effects on setting is therefore necessarily more qualitative than it might otherwise have been and the conclusions on the level of harm should be treated with an appropriate degree of caution.

Historic Farmsteads and Group Value Action Point 10

The Council welcomes the Applicant's additional assessment of group value in relation to historic farmsteads and notes they have applied the group value framework provided by LCC for assessing effects at a collective level.

The Council also notes that the scope of the exercise is limited to non-designated farmsteads with designated assets considered separately through the ES and that the impacts assessed largely relate to temporary and reversible construction-phase works associated with the cable route corridor. In that context, the generally neutral outcomes at group level are unsurprising.

Water Resources and Flood Risk

The Council has reviewed the updated ES Chapter 11 Water Resources and Flood Risk (Revision 2) (REP5-016), Appendix 11.1 Flood Risk Assessment (Revision 3) (REP5-027) and Appendix 11.3 Summary of Watercourse Crossings and Photography (Revision 2) (REP5-029) and as Lead Local Flood Authority has no comments to make.

Sequential Test and update to Planning Statement (REP5-010)

The applicant highlighted within the most recent iteration of the SoCG with LCC (submitted at DL6) that Annex G of the planning statement has been updated to expand the sequential test commentary, tracked changes are not evident within this document. The Council would request that the applicant provide a tracked change version of this document update for review.

Soils and Agriculture

The Council has reviewed the updated Outline Soil Management Plan (oSMP) (Revision 3) (REP5-031) and has no further comments on the oSMP.

ISH 3 Action Point 7 in Applicant's Responses to Remaining Action Points (REP5-046)

The updated figures are acknowledged, noting that the One Earth Solar proposal has since corrected its previous submission, which the Council broadly agrees with. However, the Council's core concerns regarding the impact on Best and Most Versatile (BMV) agricultural land remain, as outlined in our LIR (REP1-044).

Waste

The Council continues to raise concern regarding the lack of any forecasts from the Applicant for waste arisings for any phase of the project. The Council understands these figures would be indicative, however the Council considers they should be submitted into the examination and calculations should be made using assumptions.

The lack of available capacity for recycling PV panels, particularly in light of the cumulative quantity alongside similar projects and the Applicant's failure to calculate/provide cumulative quantities is also of significant concern to the Council.

Please see the below commentary to updated documents submitted at DL5 with regard to waste matters.

Draft Development Consent Order (Revision 6) (Tracked) [REP5-004] and Schedule of Changes to the Draft DCO (Revision 6) (REP5-005)

Addition of requirement 22 (operational waste) and associated references to the Waste and Recycling Strategy – The commitment to produce an 'operational site waste management plan' is welcome however the Council would also request that the applicant also provides indicative waste arisings forecasts as soon as possible.

Planning Statement (Revision 2)1 (REP5-010)

The Applicant suggests waste quantities would be small but says that forecasting quantity and destination is not possible at this stage. The Council would like to see indicative forecasts of quantity of each waste type at each phase of the project, including the proposed fate (e.g. recycling). In particular, it is a concern that the applicant believed the quantity of waste PV panels will be ‘not... significant’ and that recycling facilities will appear for them.

Outline Construction Environmental Management Plan (Revision 4) (Tracked) (REP5-018) and Outline Decommissioning Environmental Management Plan (Revision 3) (Tracked) (REP5-020)

The Council notes the lack of references to potential PV panel failures during the construction phase, and should this occur the destination of this waste stream. The oCEMP and oDEMP also lack reference to the intended destination for PV panel waste at decommissioning and finally, the forecasts for quantities of any types of waste are not referred to in either document.

Waste and Recycling Strategy (Revision 2) (Tracked) (REP5-034)

The Council disagrees with the statement made at paragraphs 4.1.4 to 4.1.5 that, even if a full PV panel replacement programme proves to be unnecessary (some other solar NSIPs have suggested a 25 year lifespan for panels), the quantity in need of replacement will be “negligible”. At the very least, the applicant should provide a forecast of the quantity of panels (ideally by weight) they think will fail on installation, need replacing each year of operation and, in particular, need processing at decommissioning.

The Council disagree that “cumulative arisings from other solar NSIPs locally are unknown at this stage” as stated within paragraph 4.1.6, as other solar NSIPs have been able to provide a forecast of these cumulative quantities. Without such information, it is unreasonable to describe the impacts as “not anticipated to be significant” or “negligible” (7.3.6). Within paragraphs 4.1.8 and 4.1.9 (also 5.2.2 - 5.2.4) –the applicant speculates that the UK PV panel recycling market will grow but this is unknown at present, as such, the Council considers there needs to be an acknowledgment of the possibility that EOL panels will need to be exported or landfilled.

At paragraph 5.2.5 the applicant suggests a PV panel failure rate of 0.2% per annum during operation. It should thus be relatively simple for them to provide the requested forecast of an annual tonnage of PV panel waste.

The Council notes paragraph 7.1, Construction Phase does not make reference to the percentage of solar panels failing on installation. Other solar NSIPs have made reference to this figure within their examination documentation and the Council requests that the applicant also provides this figure.

The Council also considers, as above, paragraph 7.2 Operational Phase should also provide figures regarding forecasted for the annual quantity of PV panel waste, and a commentary on the current lack of suitable recycling facilities.

The Council welcomes the commitment to provide an annual planned replacement schedule. However, this does not remove the need to provide an indicative forecast at this stage of annual PV panel waste.

In relation to the Decommissioning Phase, paragraph 7.3, the Council requests that the applicant provides a forecast for the quantity (weight) of PV panel waste arising from decommissioning. Without this, it is impossible to assess the impacts, particularly as the applicant is assuming that recycling capacity will appear in the meantime.

Applicant's Responses to Other Parties D4 Submissions (REP5-047)

'Solar PV panel replacement and provision of waste forecasts' the Council welcomes the commitment to produce an 'operational site waste management plan' and 'annual planned replacement schedule'. However, the Council would still like to see, as soon as possible, forecasts for waste arisings, particularly for PV panels.

Public Rights of Way

Outline Public Rights of Way Management Plan (REP5-045)

The Council notes from the information provided within Table 1 'summary of PRoW management measures' that there is only one temporary diversion planned for KkLT/4. The six other footpaths listed for temporary closures do not have proposed diversions. The Council is of the opinion, where a diverted route is possible, it should be implemented, especially should the construction period run for an extended duration.

Public Health

It is noted that no updated documents relating specifically to Health and Wellbeing were submitted at deadline 5. As such the below comments are restricted to the Councils main areas of concern, mental health impacts from a changed landscape, the perceived risk from Electromagnetic Fields (EMFs), and physical health impacts of EMFs, as expressed in our Local Impact Report (REP1- XX). The Council continue to raise concern regarding these topics as the updated documents do not give assurance that the cumulative EMFs decrease sufficiently with distance from source to not be a risk to people in the area.

Upon reviewing Ref 6.2.6: ES Chapter 6 Landscape and Visual (REP5- XX) there have been minimal changes to the content of the document. Formatting and sentence structure were perceived to be the main changes. Though the soil stockpiles were the only noticeable screening mitigation measure that has been included.

Cumulative Effects

The Council has reviewed the Technical Note: Cumulative Effects Assessment Update (REP5-049) and confirms that the additional schemes included in the update align with those previously requested by the Council. REP5-049 states that the review of additional schemes identified since the original ES concludes that no update to the Cumulative Effects Assessment is required. Most new projects were either already considered, are too distant or small to result in significant combined impacts or lack sufficient detail for meaningful assessment at this stage. Large-scale developments such as Ossian offshore wind and National Grid infrastructure will incorporate Beacon Fen in their own future assessments. Overall, the cumulative effects remain as previously reported, and the applicant does not consider that an update to the Cumulative Effects Assessment is required.

As such there remains some points of disagreement remain regarding conclusions made on the significance of inter-project cumulative effects in the overall assessment of cumulative effects with other developments, which the Council considers to be under-assessed. In particular those related to landscape and visual impact, waste, and the loss of best and most versatile (BMV) agricultural land. These areas of disagreement are detailed in our LIR (REP1-044), and further written submissions, and in the Statement of Common Ground (SoCG). The Technical note does not fundamentally alter our position on these matters.

Outline Safety Battery Management Plan (OBSMP) (REP5-035)

Lincolnshire Fire and Rescue (LFR) have reviewed the updated oBSMP and LFR comments are provided below:

- Executive Summary – Whilst updated, LFR will still need details of ‘final BESS design’ to allow comments to be made, e.g. site layout, BESS spacing etc.
- 2.3.3 / 2.3.6 - Positive to see that the EA are referenced in relation to consultation around fire water management, and the development of the Outline Firewater Management Strategy
- 2.6.5 - Updated national documents have been referenced – NFPA 855 – Outlines BESS design and specification - with a key update being that BESS design and site layout is validated through Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any LFR intervention in a thermal runaway incident
- 4.1.8 – Updates to outline tests will be in-line with national standards – 9540A
- 4.3.14 – Updated water supplies, including volumes available – Primary and secondary water supplies will need to be finalised with LFR (as stated).
- 4.3.21 – Reference to containment of firewater runoff is outlined – LFR reserve the right to discuss details with the EA to support concept of minimalising impact on the environment – Consideration would need to be given when developing fire fighting tactics, e.g. quantities of water to be used
- 4.3.23 – LFR reserve the right to be consulted with when the applicant is developing the ‘firewater management strategy’, before agreeing suitability

Yours faithfully,

[REDACTED]

For [REDACTED]

Head of Planning