

By email to:

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Date: 16 February 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 7.

Ecology

Outline Construction Environmental Management Plan (oCEMP) (Revision 5) (REP7-020)

The Council notes the updates made in REP7-020 and has the following comments to make:

The Council welcomes confirmation at 6.7.8 that pre-construction surveys will include surveys for scarce arable flora and that where scarce arable flora are detected the seedbed will be removed and planted in areas to be managed as neutral grassland.

The Council welcomes the inclusion of measures at 6.7.13 to 6.7.17 aimed at mitigating potential impacts on birds including specific pre-construction surveys for quail.

Outline Landscape and Ecological Management Plan (Revision 5) (REP7-025)

The Council notes the updates made in REP7-025 and has the following comments to make:

The Council welcomes the inclusion of details relating to the establishment and disbanding of the proposed Ecological Steering Group (ESG) at 1.6.56. The Council has agreed with the Applicant that the requirement for recommendations made by members of the ESG to be 'written' should be removed. This will allow for recommendations to be made at meetings of the ESG as well as in writing. The final text agreed is as follows:

1.6.56 The Applicant will establish the ESG at least 6 months prior to the submission of the first detailed LEMP(s) to provide an opportunity to make recommendations on a the draft LEMP(s) in advance of its submission pursuant to Requirement 7. The Applicant must have regard to such recommendations received within two weeks of the draft being shared and subject to the principles in 1.6.51. The ESG would convene and begin normal operations in advance of the commencement of the activities set out in the approved LEMP(s) and shall continue to exist until completion of decommissioning works, unless a shorter period is agreed between the members of the ESG.

The Council welcomes the inclusion of details relating to how financial contributions relating to the ESG will be secured in the DCO at 1.6.60.

Biodiversity Net Gain Strategy (Revision 4) (REP7-032) and Biodiversity Net Gain Strategy Metric (REP7-034)

The Council notes the updates made in REP7-032 and REP7-034 and has the following comments to make:

The Council welcomes the updates and clarifications which address previous comments relating to the incorporation of the change request (PD-015).

The Council considers that the role of the Ecological Steering Group in relation to the BNG Strategy should be referenced in Section 6.

Applicant's Responses to Other Parties Deadline 6 Submissions (REP7-051)

The Council notes the Applicant's comments on Deadline 6 submissions and confirms that the lack of full mitigation for the predicted permanent negative impact on ground nesting farmland birds, particularly skylark, remains a matter of disagreement.

Landscape and Visual

The Council has reviewed the documents submitted at deadline 7 in respect of landscape and visual impact matters, in particular the Applicant's Responses to Other Parties Deadline 6 Submissions [REP7-051]. The Council has no further comments to make at this stage and our position remains as set out in our LIR [REP1-044], and in further submissions most recently through REP6-041 following updates to the Environmental Statement and through the SoCG.

Archaeology

The Council welcome the inclusion of the Archaeological Clerk of Works (AcoW) role within the oCEMP (Para 3.2.15) [REP7-020]. It would have been useful to include mention of the AcoW within Section 6.8 Cultural Heritage of the oCEMP for consistency and completeness. The precise scope of the role, their responsibilities and remit will be finalised after discussion between the Applicant and LCC.

The Council look forward to working with the Applicant on the forthcoming Public Archaeology and Community Engagement Strategy (PACES), with agreed provisions for engagement and benefits set out maximising the results of the cultural heritage works. Consideration of enhancement of the historic environment is invaluable in balancing the impacts of any development proposal and interest in archaeology, particularly any remains which have been found locally, can be massive and, if done well, can have the potential to foster high amounts of positive publicity. It can increase both physical and mental well-being and offset elements of a development which may be poorly perceived or have a visibly negative impact on surrounding communities and its value has recently been reported on for Lincolnshire ([valuesofheritagereport2025.pdf](#)).

Waste

The Council has reviewed the Applicant's Responses to Other Parties' Deadline 6 Submissions [REP7-051] and notes the Applicant's signposting to REP2-041 and the indicative waste figures contained within that document. These figures, which we have also reviewed, were submitted under Cumulative Impacts at item 17.12 rather than within the waste section. There are some points of detail regarding these figures set out below.

PV panels –

- Construction – Unlike some of the other solar NSIPs, there is no mention of any failures on installation. Others schemes have generally suggested that this would be expected to be similar to the annual operational failure rate.
- Operational – The estimated failure rate of 0.2% per annum and the overall figure of 52 tonnes p/a is noted. It would be useful to clarify whether a planned replacement programme is proposed, or if replacements are intended to be carried out solely on an ad hoc basis.

Other wastes –

- Quantities are only described (under item 17.12) as ranging from “significant” (e.g. batteries at decommissioning) to “limited”. It would be helpful to have tonnage forecasts for each waste type, particularly for batteries, at each project phase to help establish the potential impacts.

Overall, we remain concerned about the quantity of waste arisings, especially cumulatively alongside other similar projects working to similar timescales, and how they will be managed. This is particularly the case for PV panels where limited recycling capacity is currently available, as expressed in LCC's SoCG [REP6-031].

Draft Development Consent Order (Revision 8) [REP7-004]

Articles 50

The Council are satisfied that the inclusion of Article 50 would be an appropriate alternative to a Section 106 agreement to secure funding for the ESG contributions, and we are generally satisfied with the wording as drafted.

Yours faithfully,

A solid black rectangular box used to redact the signature of Neil McBride.

For Neil McBride

Head of Planning