

Submission ID: S5AE218AC

See attached oral script from ISH1

## **Oral Script – ISH1 (Need, Site Selection & Alternatives) - Matthew Mountain, Director of LCJ Mountain Farms Ltd**

Good morning, and thank you, Inspector. I am Matthew Mountain, Director of LCJ Mountain Farms Ltd, a directly affected landowner, with over a third of the cable route, 3.2 kilometres, running through our farm.

### **First, by way of update since our 2 July submission:**

- The AGR3 solar and battery project on our land, 49.9 megawatts, was consented at appeal on 13 August.
- This is now a committed scheme, and its interaction with the DCO route needs to be considered.
- We are also in active discussions on further expansion and associated infrastructure, which reinforces the need for future-proofing.

### **Second, on reasonable alternatives (see ES Chapter 3 – Alternatives and Design Evolution, APP-054):**

- In November 2021 we offered the Applicant 516 acres, only 2.7 kilometres from Bicker Fen, mostly Grade 3a and 3b, as a willing landowner.
- That land has since been independently classified under the AGR3 appeal process as predominantly Grade 3a. In other words, the land we offered was of the same quality now confirmed by detailed ALC assessment — but far closer to Bicker Fen and without the long cable corridor.
- This was discounted early on the grounds of cumulative impact, when the zone contained only 99 megawatts on the TEC register. Today, that figure has grown by over 2,000% to more than 2,100 megawatts — yet our alternative has never been revisited, even after Beacon Fen South fell away. That is not consistent with EN-1 and EN-3 requirements.
- National Policy Statements EN-1 and EN-3 require minimising loss of best and most versatile land and demonstrating efficient use of infrastructure. That has not been met here.

### **Third, on inaccuracies and omissions (see Appendix 3.1 Cable Route Corridor Appraisal, APP-079):**

- Local Wildlife Site 4722 has been mis-identified. The proposed route directly affects it.
- Cumulative impacts with Viking Link works and compounds have not been properly assessed.
- Soil impacts are understated. Our before-and-after soil surveys from Viking Link show lasting degradation despite so-called “embedded mitigation.”

### **Fourth, on consultation and procedural adequacy (see Planning Statement, APP-277):**

- Despite our clear interests in battery storage, data centre demand, and a glasshouse project, we were not meaningfully engaged as a statutory consultee after our 2021 land offer, or even after our March 2024 objection letter via Mishcon de Reya.
- Instead, the Applicant chose to approach third-party developers such as ib vogt, who at that time held no rights over the land in question. That raises real questions about whether consultation duties under sections 42 to 44 of the Planning Act were properly fulfilled.

### **Fifth, on integration and grid efficiency (see Electricity Grid Connection Statement, APP-285):**

- The scheme has been designed as a sealed linear export.
- In practice, this area is becoming an integrated energy and demand hub – with AGR3 now consented, Root Power’s consented 100MW BESS, Ecotricity’s Heckington Fen NSIP, and AGR’s licensed iDNO position.
- The scheme proposes 600 MW of BESS against 400 MW of PV. That ~200 MW headroom is precisely the capacity that could support local final demand — for example, the AGR data centre — via safeguarded spur/node/substation options. EN-1 expects efficient, multi-use infrastructure. A sealed linear export forecloses that opportunity.
- We raised this directly with Low Carbon earlier this year, through Brown & Co. Their response was that “no headroom was available,” and even if it were, National Grid would not allow it to be transferred. That answer demonstrates the problem: the DCO scheme has been hardwired as a closed export pipeline. It is not designed to enable local integration, despite EN-1’s clear expectation for efficient, multi-purpose use of infrastructure.
- Importantly, when we offered our alternative in 2021, we also shared a Letter of Comfort with National Grid Viking Link safeguarding safe crossings of their assets on our land. Yet the current design brings a cable from 10 kilometres away to converge at this very point. That creates a direct conflict with existing national infrastructure, contrary to EN-1’s requirement for efficient use of grid assets.

### **In summary, we respectfully ask the Examining Authority to ensure that:**

1. Alternatives are robustly assessed;
2. Environmental effects are accurately tested;
3. Consultation duties with the correct parties are properly fulfilled;
4. Infrastructure conflicts such as Viking Link are resolved; and
5. Integration and efficiency of grid connections are fully examined.

Supporting expert evidence on these points will be provided at Deadline One, on 7 October. Thank you.