

1. Introduction

1.1 The Examining Authority has rightly asked the Applicant and NGET to explain how a 600 MW BESS would be utilised when only ~400 MW of solar generation is proposed. That 200 MW gap is not a theoretical quirk — it is a real, undeployed asset within a constrained transmission network.

1.2 LCJ Mountain Farms Ltd (LCJMF) has already put forward a practical, fully worked alternative that fills that gap: 618 acres of PV-capable land offered in August 2023, equating to 198 MW of additional solar capacity, plus a hybrid cable route and anchor demand on our land at Little Hale Fen. This offer has never been substantively assessed.

1.3 The question before the ExA is therefore straightforward:

Should 200 MW of connection capacity at Bicker Fen be left under-utilised — or should a deliverable, policy-aligned alternative that uses existing infrastructure more efficiently be examined properly?

2. A Precise Technical Match to the Grid Headroom

2.1 The Applicant’s own evidence [REP1-030] sets out the figures plainly:

Parameter	Value
Solar generation	~400 MW
Grid connection	600 MW
BESS capacity	600 MW

2.2 LCJMF’s August 2023 offer comprises 618 acres of PV-capable land (Ex8–Ex9; Ex16–Ex22, D1), equating to 198 MW at standard NSIP deployment density. This is almost exactly the 200 MW “headroom” identified by the ExA.

2.3 In other words: the land is there, the capacity fits, and the grid connection exists. Nothing speculative is required.

3. An Integration Opportunity Hiding in Plain Sight

3.1 Little Hale Fen is not a marginal site. It sits 2.7 km from Bicker Fen and is the planned location of a 400 MW BESS and a 1 GW hyperscale data centre.

3.2 By combining:

- 198 MW PV on LCJMF’s land,
- 400 MW BESS co-located, and
- 1 GW of strategic final demand,

the network could deliver genuine baseload consumption and flexible charging, not theoretical cycling.

3.3 This is exactly what EN-1 § 4.2.1 and EN-5 § 2.2.2 call for: maximising the use of existing transmission infrastructure through integrated design. The Applicant’s current proposal misses that opportunity entirely.

4. Deliverable Routing, Not a Paper Exercise

4.1 This is not an abstract “alternative”. The Hybrid Cable Route (Ex16–Ex22, D1) is identified, legally secured along LCJMF-controlled land, and includes a pre-carved crossing on Little Hale Drove.

4.2 It lies within the Applicant’s 10 km search radius, avoids third-party land, and steers clear of the LWS 4722 corridor.

4.3 The physical and legal groundwork already exists. This is not a reroute “on the back of an envelope” — it is shovel-ready corridor logic that the Applicant chose not to assess.

5. Outdated Arguments Should Not Carry Weight

5.1 The Applicant continues to cite non-contiguity criticisms from LCJMF’s 2021 offer and a self-imposed ≥ 300 ha sieve in Annex D. Both are obsolete.

5.2 The August 2023 offer resolved non-contiguity by bridging the two Great Hale Fen blocks internally and includes 277 ha of PAS 2 land, much of it Flood Zone 1. No like-for-like comparison has been produced.

5.3 If outdated internal sieves are allowed to trump credible, policy-aligned alternatives, the examination process risks missing the most efficient network solution available.

6. A Clear Evidential Gap in the Applicant’s Case

6.1 The Applicant has provided no load-flow, curtailment or utilisation modelling for the 600/600 MW configuration (Ex54, D1).

6.2 The ExA’s Rule 17 request highlights this same gap. A 600 MW BESS cannot be justified on the basis of a 400 MW generation fleet without showing where the additional energy comes from. LCJMF’s 200 MW PV offer answers that question directly.

7. Conclusion and Directions Sought

7.1 This is a classic example of headroom going to waste through lack of engagement. LCJMF has presented a spatially coherent, technically precise and policy-aligned solution; the Applicant has not engaged with it.

7.2 LCJMF invites the ExA to:

- (a) Require the Applicant and NGET to disclose their network utilisation modelling for the 600 MW connection;
- (b) Give little weight to the Applicant’s reliance on outdated non-contiguity and sieving criteria; and
- (c) Formally consider LCJMF’s August 2023 PV offer, hybrid cable route, and anchor demand as a credible alternative capable of delivering full utilisation of Bicker Fen.

7.3 The alternative is to let 200 MW of strategic transmission capacity sit idle, when a deliverable solution is already on the table.

Exhibits Referenced (Deadline 1)

- Ex8–Ex9; Ex16–Ex22 – August 2023 PV Offer and Hybrid Cable Route
- Ex54 – Headroom and Network Utilisation Evidence Gap