

Beacon Fen Energy Park DCO

Application Reference: EN010151

Submitted by: LCJ Mountain Farms Ltd (Interested Party Ref: F8D0BCE95)

On behalf of: LCJ Mountain Farms Ltd and, if permitted, Leslie Christopher John Mountain and Patricia Lynn Mountain (Interested Party Ref: F5A76C031)

Document: Supplementary Exhibits Volume (ExD2-1 – ExD2-20)

Deadline: Deadline 2 (D2) – 21 October 2025

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Purpose

This Supplementary Exhibits Volume accompanies LCJMF's Deadline 2 submission, comprising (i) comments on the Applicant's Deadline 1 Response to LCJMF's 2 July representation, and (ii) responses to the Examining Authority's First Written Questions (ExQ1).

It compiles, in a single paginated document, all supporting evidence referenced throughout LCJMF's Deadline 2 submission. The exhibits provide additional spatial, technical, and ecological material which was not included in the original Written Representation, particularly in relation to:

- **Ecological proximity claims** concerning LWS 4722, Mill Drain and Willow Farm Drain;
- **Cable route corridor comparisons** between the Applicant's route and the LCJMF hybrid alternative;
- **Hydrological and ecological connectivity** of adjacent landscape features; and
- **Clarification of spatial relationships** relied on in the Applicant's response of 10 October 2025.

Structure

- **Page 2** : Supplementary Exhibits Index (table of contents for ExD2-1 – ExD2-20).
- **Pages 3 – 17**: Exhibits ExD2-1 – ExD2-20 in numerical order.
- Each exhibit begins on a new page, clearly labelled with its number and title.
- **PDF bookmarks** correspond to each exhibit number for ease of navigation.

Important

This volume contains **evidence only**. All commentary, interpretation, and argumentation are set out in LCJMF's **Deadline 2 submission**. The exhibits should be read alongside the relevant references in that document.

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ExD2.1 – LWS 4722: Applicant Corridor Adjacency & Construction Compound Offset

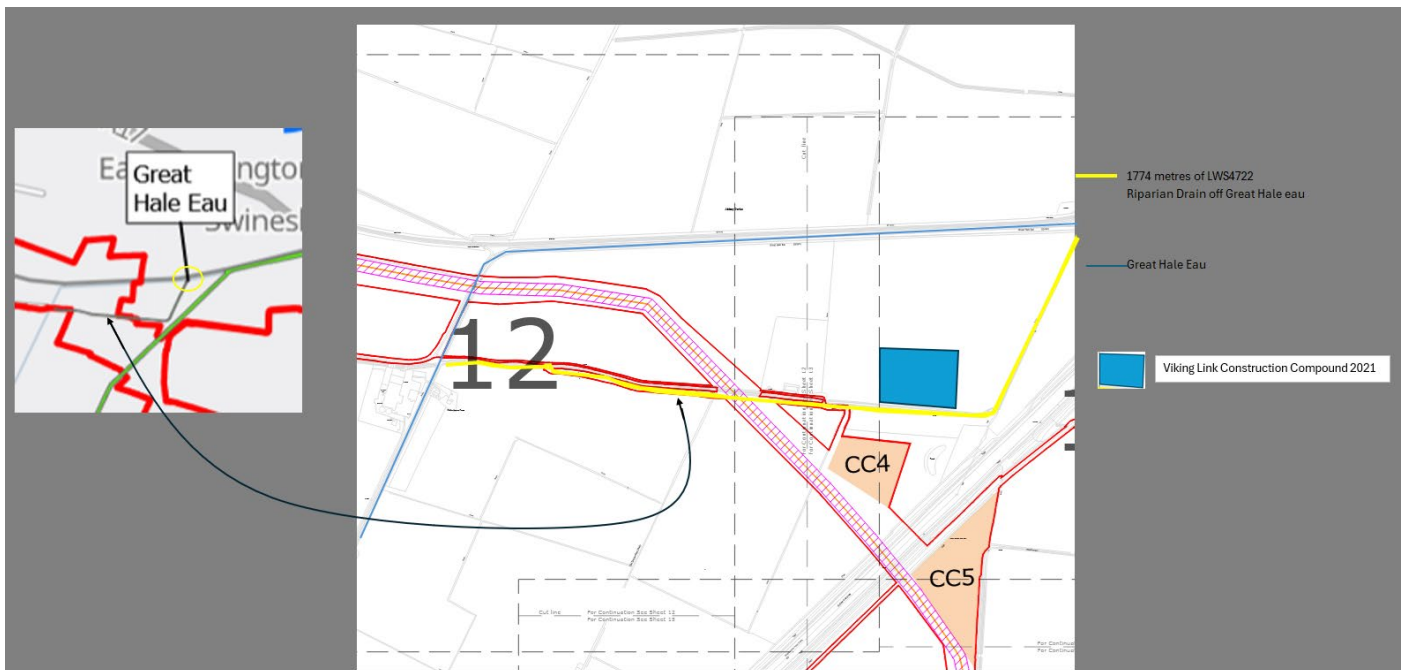
Description:

Annotated plan showing the spatial relationship between the Applicant's proposed 400 kV cable corridor and Local Wildlife Site (LWS) 4722 (Riparian Drain off Great Hale Eau, 1,774 m). The exhibit highlights approximately 1.19 km of longitudinal adjacency between the cable corridor and the LWS boundary, and the proximity (c. 70 m) of Construction Compound 4 to the LWS.

This figure evidences the sustained longitudinal disturbance zone created by the Applicant's alignment, including both trenching works and haul road formation immediately parallel to the LWS. It demonstrates that, contrary to the Applicant's assertions, the preferred route runs directly adjacent to LWS 4722 over a substantial length, increasing the risk of hydrological and ecological impacts compared with a perpendicular crossing.

Source:

LCJMF overlay based on Applicant's corridor and compound plans. Contains OS data © Crown copyright and database right 2025.



ExD2.2 Woodland South of LWS 4722 – Hydrological & Ecological Connectivity, and 0.43 ha AB1 Nectar Flower Mix and Construction Access Down LWS 4722

Description:

Annotated Google satellite imagery with LCJMF overlays showing the hydrological and ecological connectivity between LWS 4722 (Riparian Drain off Great Hale Eau) and the 7.20-acre woodland block immediately to its south, which together form a continuous riparian–woodland corridor. The figure overlays:

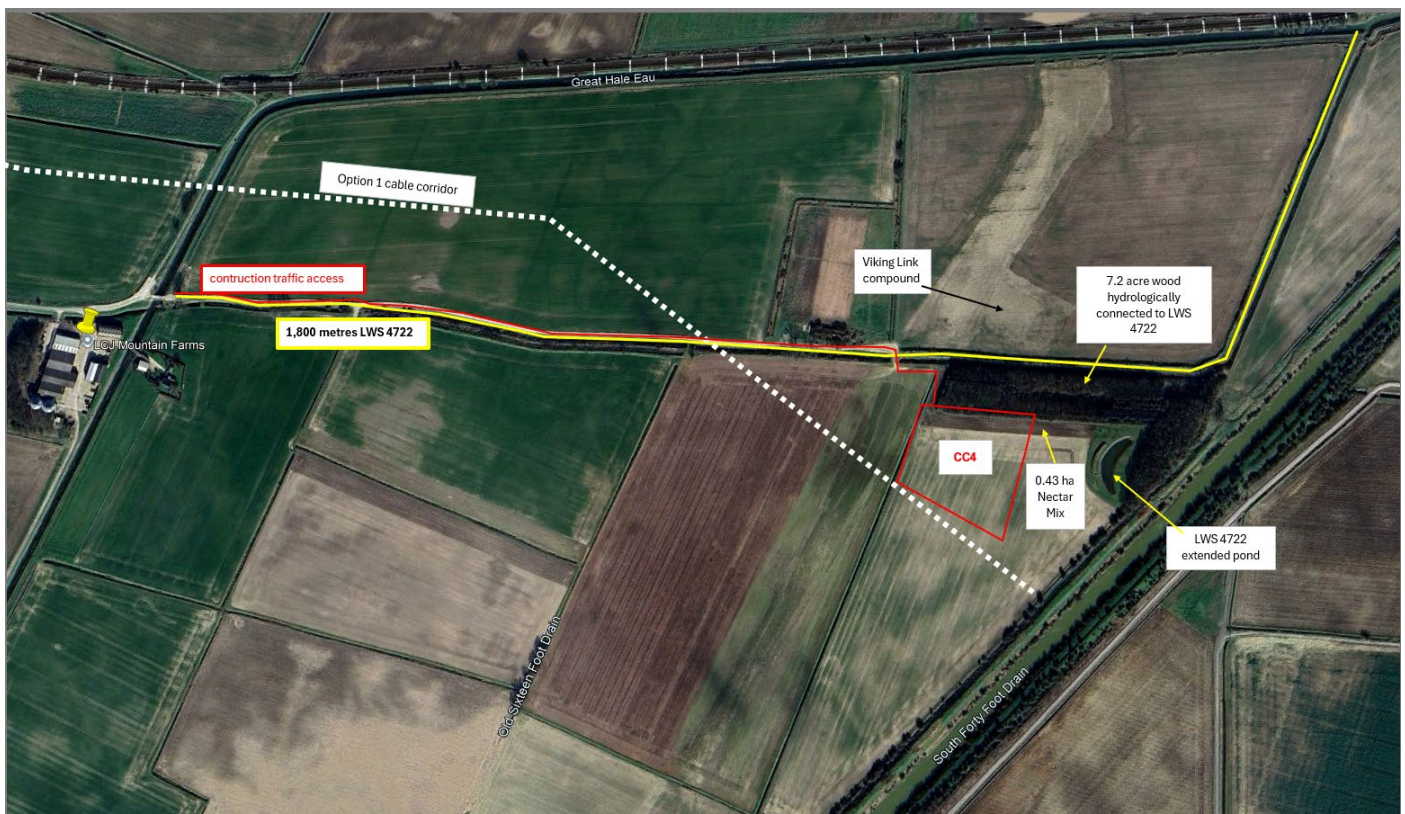
- the Applicant’s 400 kV cable corridor and haul road alignment, which run longitudinally along LWS 4722;
- the location of Construction Compound CC4, including 0.43 ha of AB1 Nectar Flower Mix (G65, TF1941 7485) under Mid Tier Countryside Stewardship (Agreement 1458243, 2023–2027); and
- key drainage lines showing hydrological continuity between LWS 4722 and the adjacent woodland.

The exhibit illustrates that:

- the woodland block and LWS 4722 operate as a single, hydrologically linked ecological feature, not isolated parcels;
- the proposed compound and access track directly interface with both the LWS and the AB1 habitat parcel, intensifying disturbance within a sensitive corridor; and
- the Applicant’s design would re-occupy and intensify disturbance along an established stewardship and ecological corridor, with no corresponding mitigation presented in the ES.

Source:

Google satellite imagery (2025) with LCJMF overlays; Countryside Stewardship Agreement 1458243 parcel data; Applicant’s DCO corridor and compound drawings.



ExD2.3 LWS Distribution within 2 km of LCJMF – Comparative Corridor Proximities

Description:

Annotated plan showing all Local Wildlife Sites (LWS) within a 2 km radius of LCJMF's land, overlaid with:

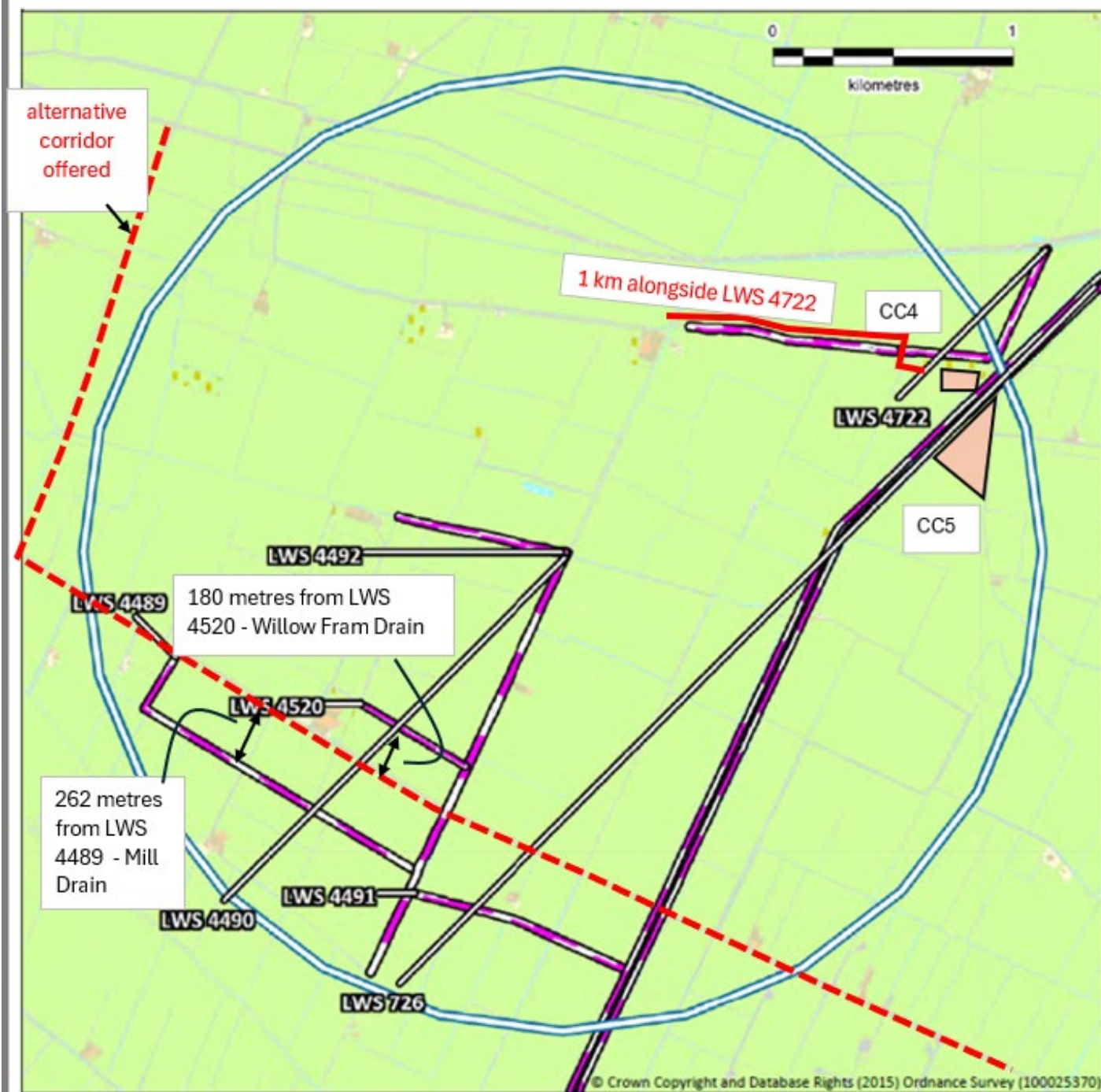
- the Applicant's 400 kV cable corridor, including the ~1 km longitudinal section running immediately alongside LWS 4722 (Riparian Drain off Great Hale Eau); and
- the LCJMF hybrid alternative cable route, which maintains stand-offs of approximately 180 m south of LWS 4520 (Willow Farm Drain) and 262 m north of LWS 4489 (Mill Drain).

The figure demonstrates the disproportionate ecological interface created by the Applicant's alignment along LWS 4722 compared with the perpendicular and offset geometry of the LCJMF hybrid alternative. Whereas the Applicant's design places sustained construction traffic and trenching directly adjacent to an LWS over 1 km in length, the LCJMF alternative avoids any longitudinal LWS interaction and preserves clear hydrological and ecological buffers to adjacent sites.

Source:

Greater Lincolnshire Nature Partnership Local Wildlife Sites Map, with LCJMF GIS overlays of the Applicant's DCO cable corridor and LCJMF hybrid route. Google satellite imagery (2025) used as basemap.

Non-statutory sites within the search area



Space restrictions on the map may result in some sites not being labelled. Please refer to the GIS layers or site citations for details.

- | | |
|---|--|
|  Local Wildlife Site |  Lincolnshire Wildlife Trust Reserve |
|  Local Geological Site (mine entrance) |  Roadside Nature Reserve |
|  Local Geological Site |  Search area |
|  Site of Nature Conservation Interest |  LERC boundary |
|  Regionally Important Geological/Geomorphological Site | |

ExD2.4 618 Acres of PV and BESS Land Offered within LCJMF Ownership and Hybrid Cable Route Alignment

SOYL base map with LCJMF overlays illustrating the 618 acres of land offered in August 2023 for solar PV and BESS, all located within LCJMF's owned and farmed block. The two main Great Hale Fen blocks (150 ac and 190 ac) are separated by only ~800 m, with LCJMF offering to bridge this internally. The hybrid alternative cable route would pick up an additional 78 acres (together with 340 acres) in Great Hale Fen and a further 200 acres in Little Hale Fen en route to Bicker Fen.

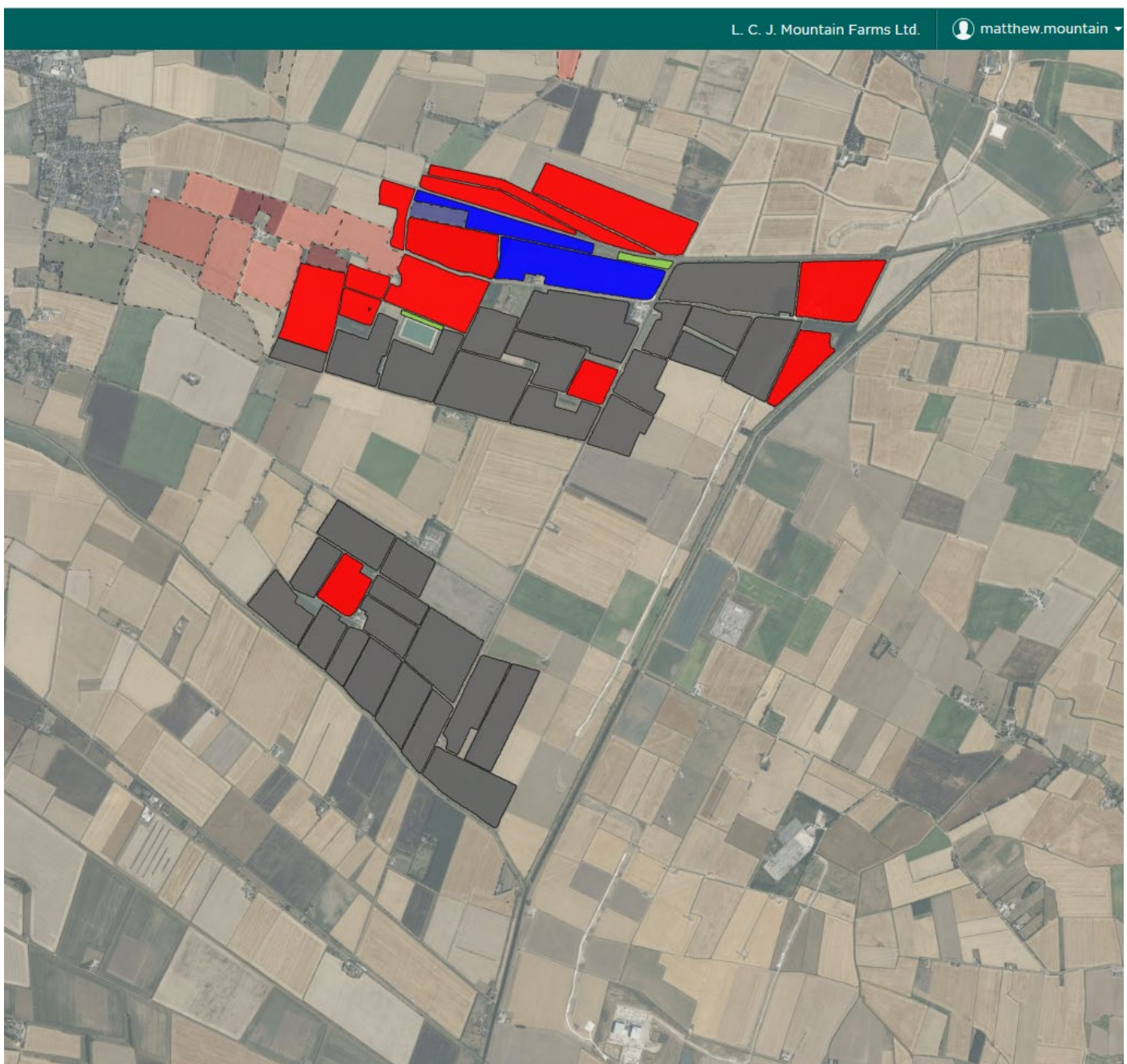


ExD2.5 LCJMF Family Land Ownership and Operational Control (~1,331 acres) – Spatial Coherence Under Single Ownership Reducing Non-Contiguity and Delivery Risks

Figure: LCJMF land ownership map showing red, blue and grey parcels [coloured fill fields – with solid black boundary lines] which are owned by LCJMF and/or Mr and Mrs Mountain [The Mountain Private Pension Scheme] and the faded orange and translucent parcels [with black dashed boundary lines, in the west] which are **leased** by LCJMF.

Source: LCJMF landholding plan (© LCJ Mountain Farms Ltd 2025). Contains OS data © Crown copyright and database right 2025. Used for examination purposes.

Note: This map illustrates the extent of the LCJMF family's ownership across Little Hale Fen and Great Hale Fen. It provides the spatial context for the LCJMF Nov 2021 and LCJMF Aug 2023 offers and related routing



ExD2.6 Countryside Stewardship – 0.43 ha Nectar Flower Mix Enhancing LWS 4722 Corridor

Figure: Google satellite imagery with LCJMF overlay showing the location of the 0.43 ha AB1 Nectar Flower Mix established under Countryside Stewardship immediately south of LWS 4722. The figure illustrates how this stewardship parcel stacks with the LWS's hydrological and ecological corridor, enhancing the site's natural capital value.

Source: Google satellite imagery with LCJMF overlay (© LCJ Mountain Farms Ltd 2025). Contains OS data © Crown copyright and database right 2025.

Date Agreement Document Generated: 11/10/2022							
Agreement Number 1458243		Agreement Version: 2				Page 6 of 17	
<div>Agreement Name: LCJ Mountain Farms Agreement Document Type: Mid Tier Agreement Number: 1458243 Agreement Start Date: 01/01/2023 Agreement End Date: 31/12/2027</div>							
Countryside Stewardship Agreement Document							
<h3>4. Summary of Multi-Year Options</h3>							
The following is a summary of the Multi-Year Options agreed to be implemented under the Agreement.							
Parcel name	Parcel number	Option code	Option title	Total parcel area	Option area/length	Option start date	Option end date
G65	TF1941 7485	AB1	Nectar Flower Mix	11.7625 ha	0.4300 ha	01/01/2023	31/12/2027




ExD2.7 Brown & Co note of call with Low Carbon (March 2025)

This internal contemporaneous note records a telephone conversation in which the Applicant stated that there was “no available headroom” under the 600 MW import / 600 MW export configuration, as all capacity was said to be allocated to the BESS. The Applicant also stated that even if spare capacity existed, it could not be made available or novated. No technical justification was provided for these assertions. This evidence is relevant to the transparency of network utilisation and the treatment of potential integration opportunities.

Source: Brown & Co email note of call with Low Carbon, 15 March 2025.

LC

 Ed Blundy [REDACTED]

Reply

Reply All

Forward

...

Sat 15/03/2025 3:28 AM

You forwarded this message on 17/03/2025 8:26 PM.

Hi Matt,

I have heard from James now and I'm afraid that it wasn't a positive call.

The official line is that there is no available headroom (because it is all being used for the BESS), but even if there was, they wouldn't be able/ allowed to make it available or transfer/ novate it to you.

James apologised and said he didn't understand fully the technical reasons for this, only that this was how he had had it explained to him (essential not allowed by NG, he thought). I explained that we thought it could be possible for them to use it, essential via us, or vice versa, in such a JV way that wouldn't need a novation. If there is no headroom however, that's somewhat immaterial.

He said they were 'heads down and busy getting ready for their submissions'.

Separately, (beforehand) I spoke with Sean at Ardent. He was calling in the hope of an update. I said that it was in LC's court and that I hoped to hear from them soon.

I emailed James to let him know this and he called within a few minutes.


At the end of the call, it felt as though we had reached the end of the line with LC in terms of trying to work with them as part of a farm-wide master plan. Regrettably.

[REDACTED]

Regards




Ed

Ed Blundy, MRICS FAAV REV
Partner | Head of Land Agency Division



For full details of all our services, please visit our [Website](#)

For and on behalf of Brown & Co - Property & Business Consultants LLP

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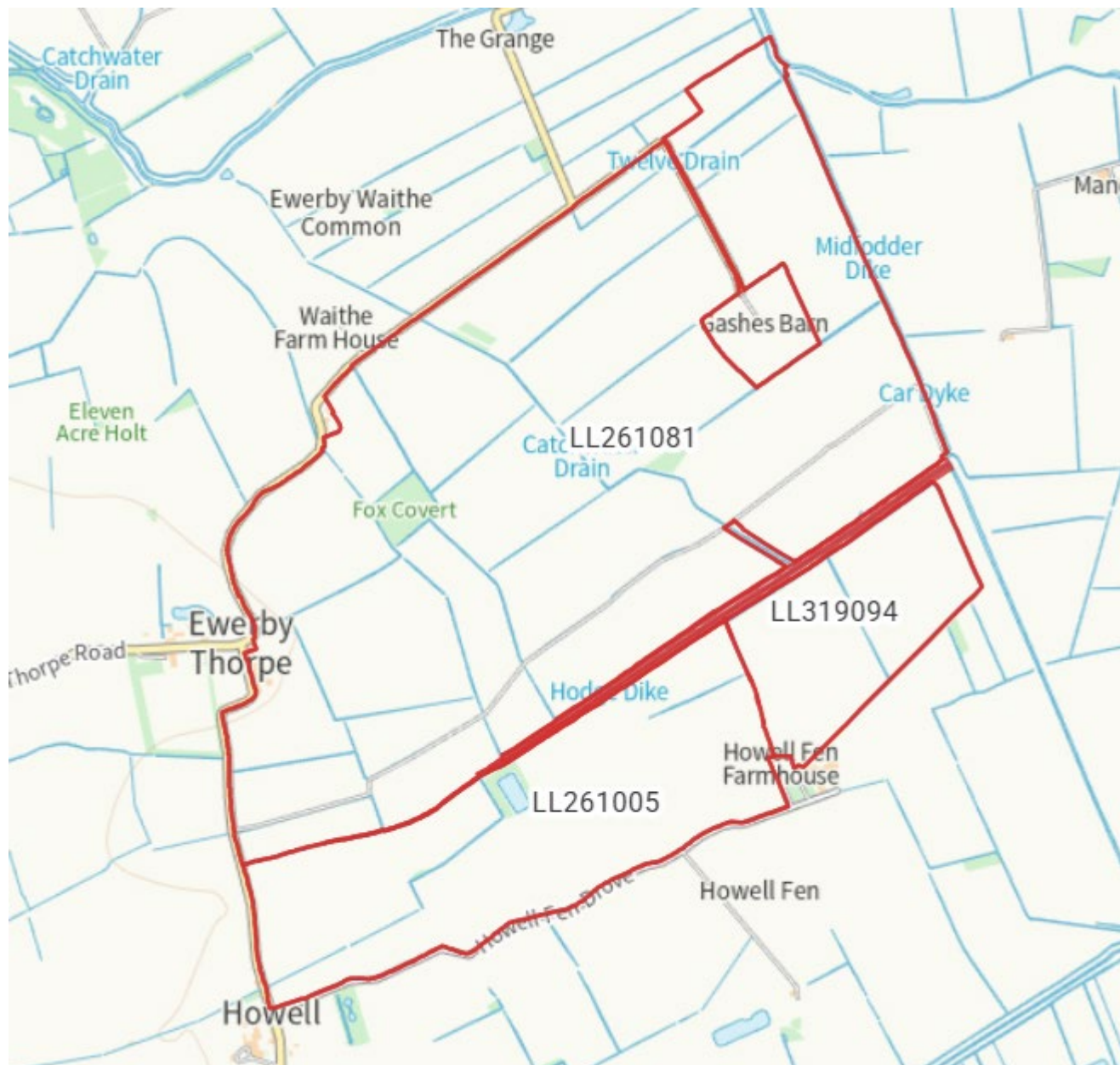
ExD2.8 – Beacon Fen North Land Ownership (Land App / Ordnance Survey Title Map): Three Separate Landowners Requiring Three Agreements, Compared with LCJMF’s 2021 and 2023 Offers (Potential Reduction in Agreements)

Titles shown:

- LL261081 – c. 935 acres
- LL261005 – c. 240 acres
- LL319094 – c. 110 acres

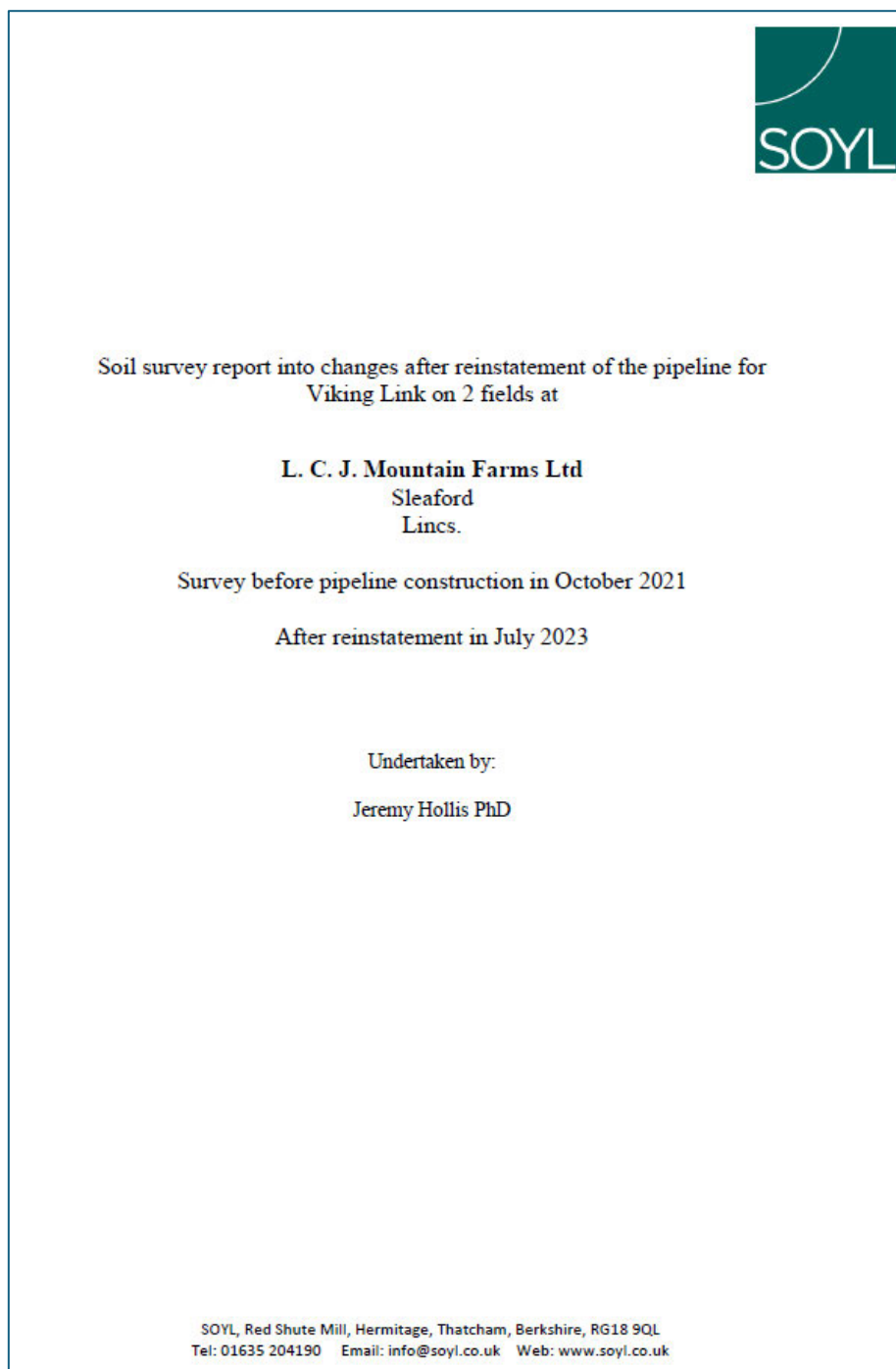
Total: c. 1,282 acres

Source: Land App base mapping with Ordnance Survey data (© Crown copyright and database right 2025) and HM Land Registry title overlays.



ExD2.9 – Viking Link Pipeline: Before-and-After Soil Structure Survey (2021–2023), LCJ Mountain Farms Ltd

Source: SOYL Ltd (Jeremy Hollis PhD), *Soil survey report into changes after reinstatement of the pipeline for Viking Link on two fields at LCJ Mountain Farms Ltd, Sleaford, Lincolnshire*. Baseline survey conducted October 2021; post-construction survey conducted July 2023.



Topsoil structure results

The structure is considerably worse now than before the pipeline was put in. In 2021 only the heaviest soil type (10) had a poor structure whereas now most of the reinstated land has a poor structure. Out of 7 assessments only 2 weren't poor and were classified as adequate. These were on the lighter soil in their respective fields (soil 6 in Far 52 and soil 1 in Starvalls). This is also on the lowest conductivity land (page 8) and suggests that all the heavier land that is higher in conductivity is now poorly structured.

Now there is no good structure whereas in the original survey, the heaviest soil in Starvalls (soil type 8 & 9) was well structured (page 9) which suggests that the whole field was well structured. Some of the soil types in Far 52 are lighter than soil type 8 (page 6) and therefore they may also have been well structured before the pipeline.

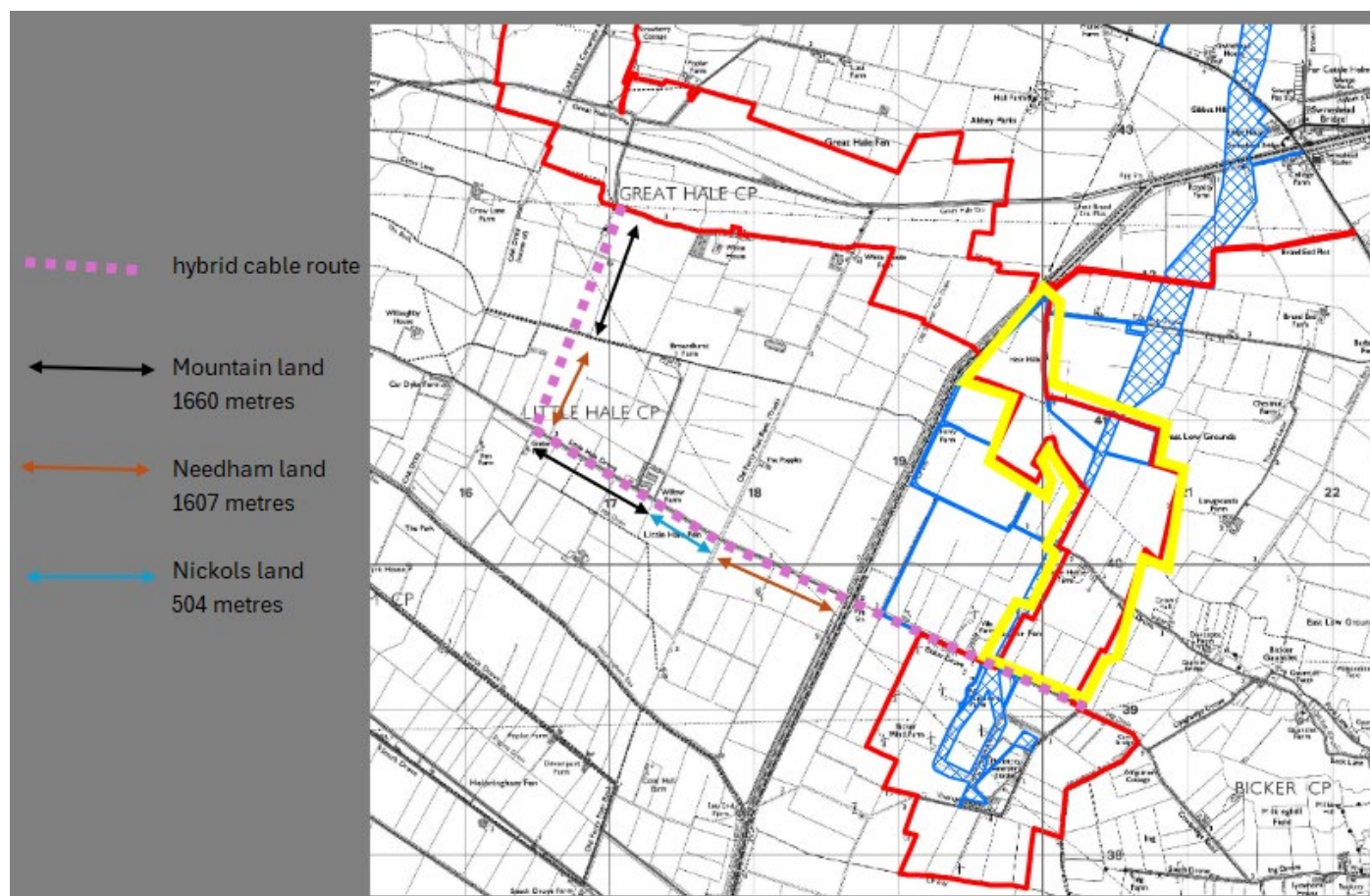
ExD2.10 – LCJMF Hybrid cable route offer across LCJMF land, with all PV parcels with LCJMF controlled areas making interconnection possible without additional land rights.



ExD2.11 Moving the hybrid cable route slightly east (yellow dotted line heading south) through LCJMF land — picking up all LCJMF August 2023 PV and BESS offers.



ExD2.12 Order limits east of the South Forty Foot showing landowners [yellow boundary] that would be avoided by the LCJMF hybrid corridor offer of going south to Little Hale Fen across LCJMF land and east to Bicker Drove and into Bicker substation point of connection.



Bicker Drove east of the South Forty Foot



ExD2.13 - AGR3 lease clause – cable corridor co-location

Description:

Clause 3.19 of the AGR3 lease requires the Tenant to use reasonable endeavours to position cable infrastructure within or alongside Little Hale Drove, so as to enable additional infrastructure to be installed by the Landlord in the future. The clause provides a contractual mechanism for shared use and future-proofing of cable corridors, including through crossing agreements under clause 10.3.

Source: AGR Solar 3 Ltd lease agreement, clause 3.19.

Confidentiality: Extract provided for examination commentary. Commercial lease content – not for wider circulation.

3.19	Cable Route	24
<p data-bbox="225 1232 1377 1406">The Tenant shall use reasonable endeavours to locate any infrastructure or equipment which it intends to lay within or alongside Little Hale Drove, so as to allow additional infrastructure or equipment to be laid in Little Hale Drove by the Landlord in connection with the development of the Landlord's Adjoining Property for any purpose, provided that where a crossing agreement or similar is required clause 10.3 shall apply.</p>		

[Contains commercial lease extract – for examination use only; not for wider circulation.]

ExD2.14-19 Photo set – Starvalls Field flooding on Viking Link corridor (21.10.2023) and control

Description:

A series of site photographs taken on 21 October 2023 documents localised flooding along the reinstated Viking Link cable corridor in Starvalls Field. The images capture significant standing water and surface flooding at the south end and middle of the corridor, contrasted with adjacent control areas that were unaffected by cable works. This differential drainage performance illustrates the medium-term impacts of trenching on soil structure and hydrology in intensively farmed fenland. The photographic evidence provides a relevant analogue for assessing the likely agricultural consequences of the proposed Beacon Fen cable route.

Source:

Site photographs taken by LCJ Mountain Farms Ltd, 21 October 2023. © LCJ Mountain Farms Ltd 2023. Used for examination commentary.











< 1



Dad

21 Oct 2023



West side of Starvalls
walked firm . I was sinking in
in Viking Link corridor

19:02

ExD2.20 NDVI (03.10.2023) – Starvalls Field cable corridor condition

Description:

Near-Infrared (NDVI) satellite imagery dated 3 October 2023 depicts persistent vegetation stress and reduced crop vigour along the reinstated Viking Link cable corridor within Starvalls Field. The linear feature visible through the cropped area corresponds to the trench alignment, illustrating post-construction impacts on soil structure and crop performance that have not fully recovered.

This imagery is included to provide a relevant analogue for the anticipated medium-term impacts of the Beacon Fen cable route across high-quality agricultural land, particularly where reinstatement is proposed on intensively cultivated Grade 1 and 2 soils.

Source:

Commercial NDVI satellite dataset, 3 October 2023. LCJMF overlay © LCJ Mountain Farms Ltd 2025. Used for examination commentary.

