LCJ Mountain Farms Ltd – Comments on the Applicant's Deadline 2 Submissions

Project: Beacon Fen Energy Park DCO (EN010151)
Deadline: D3 — 31 October 2025
Submission item: Comments on any further information/submissions received by Deadline 2
Interested Party: LCJ Mountain Farms Ltd (IP Ref: F8D0BCE95)
Also on behalf of (if applicable): Leslie Christopher John Mountain; Patricia Lynn Mountain (IP Ref: F5A76C031)
Contact: Matthew Mountain, Director — [redacted] | + [redacted]

Summary

LCJ Mountain Farms Ltd ("LCJMF") welcomes clarifications provided at Deadline 2, but considers the following matters remain unresolved and require short, proportionate consolidations (using material already on the record):

1. **Reasonable alternatives (post-BFS):** a like-for-like matrix that re-tests Option 1, Option 3, LCJMF's Aug-2023 hybrid and Nov-2021 partial PV/BESS against EN-1 (2023) §4.3 on proportionate alternatives.
2. **Environmental/cumulative gaps:** quantitative treatment of LWS 4722 and Viking Link repeat-use effects, and regional cumulatives with Heckington Fen.
3. **Land-rights/sterilisation:** define the permanent easement + operational offsets across LCJMF land and adopt a transparent sterilisation schedule (PV area; BESS pro-rata "blocked MW"), with CPIH indexation and professional fees.
4. **Future-proofing:** secure a mapped spur-node on LCJMF land and programme-neutral 33 kV duct governance (or the safeguarded fallback) to avoid later re-entry to the 400 kV corridor.
5. **Process compliance (Annex E/Rule 6):** tracked Book of Reference / Statement of Reason / Land Plan updates and concise change schedules; a short Detailed Negotiations Tracker.

Our detailed comments are keyed to REP2-040, REP2-041, REP2-042, REP2-043 and REP2-045 and are cross-referenced to the matrix in Section 2.

---

1. Purpose & Scope

This submission provides LCJMF's comments on the Applicant's Deadline 2 materials (the "D2 Submissions"):

- REP2-040 – Applicant's Responses to the ExA's First Questions (ExQ1)
- REP2-041 – Applicant's Comments on Local Impact Reports (LIRs)
- REP2-042 – Water Demand and Source Options Appraisal
- REP2-043 – Applicant's Comments on Written Representations
- REP2-045 – Update on Compulsory Acquisition

LCJMF draws only on documents already in the Examination Library (e.g., APP-054, APP-079, APP-277/285, Doc 9.1) and our filed exhibits. No new surveys are sought.

How to read this submission.

- Section 2 is a concise, document-keyed comments matrix aligned to your latest structure (headings 2.x, 3.x, 4.x, 5.x, 6.x, 7.x etc.).
- Section 3 lists the Requested actions (Rule 17 directions) and provides a single set of asks that the matrix lines point to.
- Annex A contains copy-ready Protective Provisions for a spur-node and programme-neutral 33 kV duct on LCJMF land (with a safeguarded fallback if the duct is not installed now).
- Annex B provides a sterilisation valuation schedule for the LCJMF corridor strip, to be fixed on as-built re-measurement.

- Annex C sets LWS 4722 construction safeguards consistent with EN-1's mitigation hierarchy.
- Where helpful, LCJMF signposts our D1 materials for context only (e.g., REP1-041/-042/-043); we do not repeat D1 argumentation.

2. Comments and Matrix

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
— 2. Update Since 2 July Submission —			
— 2.1 AGR3 consent and expansion potential (13 August 2025) —			
REP2-043 – Applicant's Comments on Written Representations	*Applicant narrative (kept):* AGR3 was on the ES long list (APP-081) but screened non-EIA; now consented on appeal. Applicant sees unlikely significant cumulative effects. The AGR3–Beacon Fen interface is outside LCJMF land and will be handled bilaterally with AGR; meeting held 20 Oct 2025. Applicant says it's unclear what LCJMF seeks; LCJMF's data-centre/BESS references appear hypothetical or early-stage.	Committed baseline & on-farm risk. AGR3 (49.9 MW PV + BESS) on LCJMF land (LPA Ref 23/1021/FUL; Appeal Ref APP/R2520/W/25/3363027) is now consented and therefore part of the committed cumulative baseline. The Applicant's 400 kV export corridor crosses LCJMF land before intersecting AGR3 further east (outside LCJMF). As the directly affected freeholder/occupier, LCJMF seeks proportionate, programme-neutral safeguards so the DCO does not foreclose a future Medium-Voltage (MV) tie-in to proximate strategic demand/storage on LCJMF land (e.g., BESS / data centre). This is not speculative: (i) AGR3 is consented; (ii) the corridor physically traverses LCJMF; and (iii) post-BFS configuration remains 600 MW import / 600 MW export with only 400 MW PV (headroom context).	Requirements / Protective Provisions + plans (programme-neutral; inside the Order limits): A) Mapped spur-node on LCJMF land. Reserve a defined spur-node location on LCJMF land with permanent rights (access, maintenance, future connection), engineering clearances and deposited as-built records, enabling a later Medium-Voltage (MV) tie-in without re-opening the 400 kV corridor. B) Parallel 33 kV duct now (iDNO-ready) from the PV site to the LCJMF spur-node. Lay a single empty 33 kV duct continuously along the export corridor within the Order limits from the PV site works to a capped spur-node chamber on LCJMF land. Delivery-route agnostic (installed by the Undertaker or by LCJMF/its licensed iDNO under a side agreement). Programme-neutral; does not alter offtake. *Interface case:* where any short section of the physical run lies outside the Order limits, the Undertaker installs the duct up to the Order-limit boundary and grants interface rights so LCJMF/its iDNO can complete the short off-line link to the spur-node on equivalent standards.

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
			Fallback if B is declined (safeguard-only along the same PV → LCJMF corridor): (i) Reserve a mapped "Reserved Strip" (width [x] m) with no-build/clearance standards for the entire run between the PV site interface and the LCJMF spur-node; (ii) Pre-install HDD sleeves with draw-ropes at all hard crossings (roads, IDB drains, utilities, PRoWs) intersected by that Reserved Strip, with pull-pits and as-builts; (iii) Grant LCJMF or its licensed iDNO a step-in/option to install the 33 kV cable later on deemed-consent terms unless a substantiated safety/engineering objection is issued within [30] days (disputes to an independent engineer, safety/engineering only). Separate sterilisation head (in addition to Code/crop loss): Compensate PV/BESS opportunity loss across the 12 m easement plus 5 m operational no-build offsets either side (total 22 m) along ~3.2 km on LCJMF, plus "halo" areas at joint bays/link boxes/any permanent access. Index to CPI and include LCJMF's reasonable professional fees and management time. *'Halo Areas' means the mapped polygons surrounding fixed cable infrastructure (including joint bays, link boxes, cabinets, access pads and any residual protection works) required to meet the Undertaker's operational clearance and access standards, which shall be treated as permanently sterilised land in addition to the Easement Strip.* Policy footing / proportionality: Implements EN-1 (2023) good-design/efficient-infrastructure principles and EN-5 coordinated, future-proofed network development; avoids foreseeable second-pass disturbance (soils, LWS) and is strictly programme-neutral.

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
— 2.2 FenResilience Food & Technology Hub —			
REP2-043 – Applicant's Comments on Written Representations	*Applicant narrative (kept): The Hub proposals are "nascent" (formal offer tabled; HoTs ongoing) with no confirmed delivery partners, signed land agreements, or planning applications. CNP NSIP should not be delayed to avoid constraints on hypothetical future projects; such an approach is not required by law/policy and would run counter to EN-1 para 3.3.63 ("progressed as quickly as possible").*	What is fixed today. (i) AGR3 (49.9 MW PV + BESS) on LCJMF land is consented and is part of the committed cumulative baseline; (ii) the Applicant's 400 kV export corridor crosses LCJMF land within 2.7 km of Bicker Fen 400 kV, adjacent to Viking Link (1.4 GW) and near Triton Knoll (857 MW); (iii) a formal 1 GW anchor-load proposal (data centre) and 60-acre glasshouse are under active commercial heads and site definition on LCJMF land. Policy relevance. Whether built in one phase or several, this spatially certain co-location is directly relevant to EN-1 good design/efficient infrastructure and EN-5 coordinated network development, and warrants proportionate future-proofing so the corridor is not re-opened later. Programme neutrality. LCJMF is not seeking delay or re-scoping of a CNP NSIP; we seek minimal, construction-phase civils + paper rights now to avoid re-entry and repeat disturbance.	Requirements / Protective Provisions + plans (programme-neutral; inside Order limits): (1) Parallel 33 kV duct now (iDNO-ready) – PV site → across LCJMF section → capped spur-node on LCJMF land. Lay a single empty 33 kV duct within the approved export trench envelope from the PV site, continuously across the LCJMF section, to a mapped, capped access chamber (the "spur-node") on LCJMF land, with deposited as-built records. Delivery-route agnostic (installed by the Undertaker or by LCJMF / its licensed iDNO under a side agreement). Programme-neutral; does not alter offtake. (2) If (1) is declined – safeguard-only fallback (PV site → across LCJMF section): (i) Reserve and map a 'Reserved Strip' with objective no-build / clearance standards; (ii) Pre-install HDD sleeves with draw-ropes at all hard crossings (highways, IDB drains, utilities, PRoW) along the Reserved Strip, with pull-pits and as-builts; (iii) Grant LCJMF or its licensed iDNO a step-in/option to install the 33 kV cable later on deemed-consent terms unless a substantiated safety/engineering objection is issued within a short window (fast-track determination by an independent engineer limited to safety/engineering). (3) Mapped spur-node on LCJMF land. Fix the spur-node location and grant permanent rights (access, maintenance, future connection) with engineering clearances

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
			and deposited as-builts, enabling a later MV tie-in without re-opening the 400 kV corridor. (4) Separate sterilisation head (in addition to Code / crop loss). Compensate PV/BESS opportunity loss over the 22 m corridor (12 m easement + 5 m operational offsets each side) along ~3.2 km on LCJMF land plus "halo areas" around joint bays, link boxes/cabinets and any permanent access/turning pads (each halo mapped as a polygon). Index to CPI and include LCJMF's reasonable professional fees and management time. Policy footing / proportionality. Implements EN-1 (2023) good-design / efficient-infrastructure principles and EN-5 coordinated, future-proofed network development; avoids foreseeable second-pass disturbance (soils, LWS) and is strictly programme-neutral.
— 2.3 Heads of Terms and strategic context —			
REP2-043 – Applicant's Comments on Written Representations	*Applicant emphasis on CNP delivery speed; LCJMF's co-located demand (data centre/iDNO) and glasshouse still in HoTs and therefore "not required to be accommodated".*	Strategic context now fixed. Draft HoTs have been tabled for a 40-acre data-centre site at Little Hale Fen (via iDNO structure) and a 60-acre glasshouse; these evidence concrete planning for proximate, co-located demand and generation immediately alongside the Applicant's corridor. Little Hale / Great Hale Fen is emerging as a multi-vector energy & food hub, positioned between Bicker Fen 400 kV (2.7 km), Viking Link 1.4 GW (adjacent) and Triton Knoll 857 MW (nearby). This evolving, location-specific context is directly relevant to cumulative effects, co-location	Programme-neutral future-proofing (does not delay CNP): (A) Parallel 33 kV duct now (iDNO-ready) — PV site → across LCJMF section → capped spur-node on LCJMF land. Install a single empty 33 kV duct within the approved export trench envelope from the PV site, continuously across the LCJMF section, to a mapped, capped spur-node on LCJMF land, with deposited as-built records; delivery-route agnostic (installed by the Undertaker or by LCJMF/its licensed iDNO under a side agreement). (B) If (A) is declined — safeguard-only fallback (PV site → across

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
		opportunities, and efficient use of strategic grid infrastructure under EN-1/EN-5 (Refs D–H).	LCJMF section): reserve/map a narrow Reserved Strip with objective clearance standards; pre-install HDD sleeves with draw-ropes at all hard crossings (highways, IDB drains, utilities, PRoW) with pull-pits and as-builts; grant LCJMF/its licensed iDNO a step-in/option to install later on deemed-consent terms unless a substantiated safety/engineering objection is issued within a short window (fast-track independent engineer determination limited to safety/engineering). (C) Protect heat-reuse main crossing (data-centre ↔ glasshouse): secure alignment window, clearance/method standards, and as-builts in PPs to avoid later re-entry. (D) Sterilisation head (PV/BESS opportunity loss) on LCJMF land—index-linked and inclusive of reasonable professional/management costs (covers the 22 m corridor and mapped halo polygons around joint bays, link boxes/cabinets, and any permanent access/turning pads). Policy footing: Implements EN-1/EN-5 by minimising foreseeable re-entry and repeat soil/ecology disturbance in a uniquely constrained, nationally significant corridor—without constraining or delaying CNP delivery.
— 2.4 Sequentially preferable PV-capable land —			
REP2-043 – Applicant's Comments on Written Representations	*The Applicant queries how 9.45 acres could be "usefully incorporated" into a 529 ha Solar Array Area and says any sterilisation*	What the 9.45 acres means. Not an expansion ask for a 529 ha array; it is the permanent sterilisation on LCJMF land created by the export corridor: 12 m easement + 5 m offsets each side ≈ 22 m × 3.2 km =	Programme-neutral asks (unchanged in substance; routing clarified): Future-proof now — either: (a) Build-now, use-later duct: Install one empty 33 kV duct from the PV site, across any intervening land within the Order limits

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
	would be addressed through voluntary/statutory compensation.	7.04 ha (17.4 ac), plus joint-bay/compound halos taking the PV-capable portion to 9.45 ac. Why material here. (i) The corridor fixes a collector-spine control point on LCJMF land, shaping future collection geometry for tens of MW on Grade 3a/3b parcels and potential FZ1 BESS; (ii) network value > area value (2.3 MW equivalent at 4 ac/MW, but enables much larger adjacent deployment); (iii) market validation via active interest/HoTs with ib vogt, BSR Energy, Root Power. With post-BFS headroom and the Applicant's 10 km viability radius (Ref E), the sterilisation is material to reasonable alternatives, especially to avoid higher-value agricultural land.	(including third-party titles) and the LCJMF section, to a capped spur-node on LCJMF land (iDNO-ready), laid within the export trench envelope, with deposited as-built records. Delivery-route agnostic (installed by the Undertaker or by LCJMF/its licensed iDNO under a side agreement). Programme-neutral; does not alter offtake. (b) Safeguard-only fallback: Safeguard a continuous Reserved Strip from the PV site, across any intervening Order-limits land (including third-party titles) and the LCJMF section, to the mapped spur-node, with (i) objective no-build/clearance standards; (ii) HDD sleeves with draw-ropes at all hard crossings (roads/IDB drains/utilities/PRoW), pull-pits, and deposited as-built records; and (iii) a deemed-consent step-in for LCJMF/its iDNO unless a substantiated safety/engineering objection is issued within a short window (fast-track determination by an independent engineer limited to safety/engineering). Heat-main crossing protection (data centre ↔ 60-acre glasshouse): secure PPs wording (alignment window, clearances, methods, deposited records) so the NSIP does not sterilise heat-reuse. **<u>Distinct sterilisation head (separate from crop loss):</u>** • PV proxy: £1,100/acre/year on the PV-capable portion of the 22 m corridor (12 m easement + 5 m offsets either side) over 3.2 km plus mapped "halo" polygons at joint bays/link boxes/any permanent access/turning pads. • BESS proxy: £1,400/MW/year pro-rated to realistic hosting capacity foreclosed by corridor fixtures (basis by area/MW-loading to be agreed).

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
			• Include drainage/crop/compound tariffs, reinstatement, and construction/decommissioning bonds. Index to CPI and include LCJMF's reasonable professional fees and management time. Cumulative coordination — On Path Energy wind turbine (≤1 km, programme-neutral): 1) Acknowledge & map the wind option: show a search area and indicative 600 m (involved) / 800 m (non-involved) buffers overlaid on Order limits, joint bays, link boxes, compounds and access. 2) Scenario-test cumulatives (high-level): ETSU-R-97 noise, shadow-flicker, ZTV/LVIA, ecology, aviation/telecom, AIL and construction traffic. 3) Coordination safeguard (PPs/Requirement): site NSIP compounds/joint bays/access to avoid foreclosing turbine micro siting where reasonably practicable; include a short consult-and-avoid clause for known strategic renewables within 1 km. 4) Spur/Reserved-Strip preserved: confirm the 33 kV spur-node and Reserved Strip across the LCJMF section remain deliverable alongside any turbine siting (HDD sleeves + as-builts retained). 5) Costs: Applicant to meet reasonable professional/management costs of this coordination; no prejudice to either party's development rights. Why Code-only is insufficient: statutory compensation does not capture PV/BESS opportunity loss at a strategic collector spine nor the avoidable re-entry risk if proportionate integration/heat-main safeguards are omitted. This package implements EN-1/EN-5 by minimising sterilisation, protecting heat-reuse, and avoiding future re-opening of a

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
			nationally significant corridor segment—without delaying CNP delivery.
— 2.4 Direction sought (Update) —			
REP2-043 – Applicant's Comments on Written Representations	*Applicant narrative (kept): The AGR3/Beacon Fen cable interface is under discussion and the Applicant is confident it will be agreed before the end of the examination. The "FenResilience Hub" is at a very early stage and not relevant to alternatives/cumulative assessment. It is unclear what LCJMF seeks by "grid integration opportunities" since the scheme connects at NG 400 kV.*	Committed baseline / relevance. AGR3 is now a *consented* scheme (13 Aug 2025) and forms part of the cumulative baseline under EN-1/EN-3 and the EIA Regulations. The Applicant's corridor crosses LCJMF land; resolving an AGR–Applicant interface off LCJMF land does not address corridor design choices on LCJMF (e.g., LWS exposure, re-entry risk, heat-reuse crossings) or integration opportunities on LCJMF land. Hub context. The FenResilience Hub (co-located demand, storage, heat-reuse) is spatially fixed adjacent to the corridor. Whether delivered in one or several phases, this proximity makes proportionate future-proofing reasonable and material to alternatives, cumulatives, and efficient network use. What "grid integration" means (programme-neutral on LCJMF land): 1. 33 kV spur-node & duct: install a single empty 33 kV duct now within the export corridor to a mapped, capped spur-node on LCJMF land, with enduring rights (Requirements/PPs) and deposited as-builts (iDNO-ready). 2. Safeguarded fallback if (1) is declined: reserve a Reserved Strip with objective	Direction sought from the ExA. Treat AGR3 consent and the FenResilience co-location context as material considerations for alternatives, cumulatives, and integration. Invite the Applicant to either: (i) tabulate the future-proofing measures it will adopt on LCJMF land (as above), or (ii) provide a reasoned engineering/safety basis for declining them and propose an alternative safeguard, including a fallback sterilisation mechanism, to prevent unnecessary sterilisation and future corridor re-entry.

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
		clearance/no-build standards; pre-install HDD sleeves with draw-ropes at all hard crossings (roads/IDB drains/utilities/PRoW), with pull-pits and as-builts; include a deemed-consent step-in for LCJMF/its licensed iDNO unless a substantiated safety/engineering objection is raised (fast-track expert determination limited to safety/engineering). 3. Distinct sterilisation head: agree a PV/BESS sterilisation mechanism for the 12 m easement + 5 m operational offsets and mapped halos; index to CPI and include reasonable professional fees and management time. Policy footing / no delay. These are construction-phase civils plus paper rights that do not re-scope or delay a CNP NSIP; they implement EN-1 "good design" and EN-5 coordinated/efficient use, avoiding later re-opening of a nationally significant corridor segment.	
— 2.5 Applicant's Planning Statement and Appendix 2 references (Refs A–H) —			
APP-054 / APP-277 / Doc 9.1 (NaFRA2)	*Key statements relied on by the Applicant: Ref A EIA duty to describe reasonable alternatives & reasons; Ref B EN-1: alternatives must be proportionate but*	Material baseline change. Since the Applicant framed Refs A–H, (i) AGR3 is consented and within 2.7 km of the PoC; (ii) FenResilience Hub (co-located demand/storage/heat-reuse) is under active HoTs on	Treat Refs A–H as framing materials to test the Applicant's case against the updated baseline (AGR3 consent, Hub HoTs, NaFRA2). Invite the Applicant to:

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
	sufficient; Ref C "No alternative technologies or sites studied… could deliver project objectives"; Ref D ≥300 ha continuous PV site; Ref E 10 km connection radius viable; Ref F post-BFS configuration = 600 MW import / 600 MW export; 400 MW PV; 600 MW BESS; Ref G operational access for large vehicles/first responders; Ref H AIL logistics.	LCJMF land; (iii) NaFRA2 (2025) updates the flood-risk baseline. On that basis, a short, like-for-like refresh of alternatives is now required to remain "proportionate but sufficient". Siting filters. LCJMF's proximate Grade 3a/3b parcels (≤ 2.7 km; within the 10 km radius in Ref E) were not re-tested post-BFS. The ≥ 300 ha continuous filter in Ref D is a screening tool, not a policy bar to clustered/modular PV with a collection corridor and BESS/headroom (EN-1/EN-3/EN-5). Headroom & integration. Ref F confirms 600/600 headroom that technically supports co-ordinated generation/demand integration. Programme-neutral measures on LCJMF (mapped spur-node, single 33 kV duct within the corridor; shorter AIL/ops routes) would improve construction/operational logistics and avoid future re-entry, consistent with EN-1 "good design"	1. File a one-page side-by-side matrix re-testing Option 1, Option 3, and an LCJMF hybrid/collection-corridor using the new baseline (constraints, trench length, LWS interactions, PRoW, AIL mileage, crossings, logistics). 2. Confirm whether LCJMF proximate parcels were reconsidered against Ref E (10 km) and Ref D (≥ 300 ha), and provide reasons if clustered/modular parcels were discounted. 3. Explain how Ref F headroom supports/does not support a mapped spur-node + single 33 kV duct across LCJMF land, with deposited as-builts (iDNO-ready). 4. Provide AIL/first-responder routing and emergency-access comparisons per Refs G–H for each option. 5. Table draft PPs/Requirement text to secure the spur/duct package on LCJMF land; or, if declining, give a reasoned safety/engineering basis and propose an alternative safeguard plus a fallback sterilisation mechanism that avoids future re-entry.
— 3. Reasonable Alternatives (APP-054) (Refs A–F) —			
REP1-030 (Action Point 6), APP-054, APP-277, APP-079, APP-285	*Applicant position (kept): Alternatives were considered proportionately per EN-1 §§4.3.22–4.3.23; only options meeting objectives/timescale need be assessed. Internal sieves (e.g., contiguity/≥300 ha) ensured viable sites. APP-079 considers*	LCJMF core point (post-BFS refresh needed): (1) Proportionate ≠ omit a short matrix. EN-1 (2023) §§4.3.22–4.3.29 supports a one-page, like-for-like table comparing: (i) Applicant's chosen route/design; (ii) Option 3; (iii) LCJMF Aug-2023 hybrid; (iv) LCJMF Nov-2021 PV/BESS.	Specific, proportionate actions (no programme impact): A. One-page matrix: options (i)–(iv) with quantified metrics (LWS length/area; E–W trench vs N–S haul; PRoW & heritage crossings; HDD tally; ALC/FZ parity; HGV passes/stone tonnage). B. Flood/ALC parity tables: Ewerby Thorpe BESS vs LCJMF FZ1 BESS using NaFRA2 (Jan 2025).

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
	LCJMF's Aug-2023 hybrid (see §5.1.8+) and constraints plans (REP1-029 Appx 2).	(2) Internal sieves aren't policy tests and have been applied flexibly (Applicant's own PAS-2 = 277 ha). Post-BFS, contiguity/≥300 ha must not be treated as determinative. (3) Post-BFS change = narrow refresh, not a re-run: with 600/600 retained and 400 MW PV, re-test FZ1 vs FZ3 BESS (NaFRA2 Jan 2025) and LWS-4722 exposure (longitudinal vs right-angle crossings via Option 3 / Hybrid). (4) APP-079 treats the hybrid descriptively, not quantitatively: there is no tabulation of LWS length/area within working width, HGV/stone tonnage, PRoW/heritage crossing counts, HDD assumptions, or ALC/FZ parity (Ewerby Thorpe BESS vs LCJMF FZ1 BESS).	C. Headroom note (annex): set out BESS allocation, curtailment basis, residual capacity (per Ref F). D. Commit programme-neutral safeguards on LCJMF land: (i) install one empty 33 kV duct to a capped spur-node now; or (ii) safeguard a Reserved Strip with HDD sleeves + draw-ropes at hard crossings, pull-pits, as-builts, and deemed-consent step-in for LCJMF/iDNO (safety-objection carve-out). E. Sterilisation head (distinct from crop loss): agree PV/BESS opportunity-loss mechanism (easement + offsets + halos), indexed, incl. professional fees and reasonable management time.
— 3.2 November 2021 offer — PV + BESS (Ex1, Ex8–Ex9, Ex10, Ex13, Ex15) —			
REP1-030 (Action Point 6), APP-054 §3, APP-079 Ch.3, APP-285; Applicant reply excerpt	*Applicant narrative (kept): Alternatives were considered proportionately per EN-1 (2023) §§4.3.22–4.3.23; exercise fully compliant. LCJMF's Ex22 shows non-continuous parcels, "vast majority" in FZ3 with only small FZ2/FZ1 areas. LCJMF cited 2011 EN-1 (obsolete). APP-079 and REP1-029 address LCJMF's Aug-2023 hybrid; internal sieves (e.g., contiguity/≥300 ha) ensured viable sites on timescale.*	What LCJMF offered (Nov-2021). 516 ac (209 ha) at 2.7 km from PoC; at 4 ac/MW ≈ 129 MW. This was not a full relocation—just partial PV on ALC 3a/3b with BESS in Flood Zone 1 within the same block (Ex22). Why it was reasonable vs Option 1: (1) Proximity & efficiency (shorter trench, lower losses) (Ex8–Ex9).	Proportionate next steps (no programme impact): A) One-page like-for-like matrix comparing: (i) LC preferred; (ii) Option 3; (iii) LCJMF Aug-2023 hybrid;

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
		(2) Land quality: surveys show mainly ALC 3a/3b (Ex2; Ex2b; vs desktop polygons Ex3–Ex5). (3) Flood risk: FZ1 BESS available (Ex22; Ex6–Ex7). (4) Deliverability: offered at scheme outset; ample time for EN-1/EIA testing. (5) Integration: adjacent to strategic assets; compatible with hybrid corridor (Ex11–Ex12; Ex49–Ex52). Re Applicant points: (a) EN-1 (2023) is relied on (any older paragraph pin-points are citation slips). (b) Non-contiguity is not a policy disqualifier; LC's own PAS-2 = 277 ha shows sieve flexibility. (c) Flood test is FZ1-BESS parity vs chosen site using NaFRA2 (Jan-2025), not a headcount of all parcels in FZ3. (d) Material change post-2021: BFS withdrawn; 600/600 retained; 400 MW PV ⇒ headroom context. (e) APP-079 / REP1-029 describe constraints but do not quantify: LWS length/area in working width; HGV/stone tonnage; E–W vs N–S trench; PRoW/heritage crossings; HDD tally; ALC/FZ parity for an FZ1-BESS alternative.	(iv) LCJMF Nov-2021 partial siting—with quantified metrics (LWS exposure, trench/haul, PRoW/heritage, HDD, ALC/FZ parity, HGV/stone). B) Parity tables (paper-only): BESS in FZ1 (LCJMF) vs chosen BESS; PV on 3a/3b vs chosen PV—using NaFRA2 (Jan-2025) and ALC evidence already on file. C) Record headroom note (annex): 600/600 retained; 400 MW PV; allocation/curtailment/residual capacity. D) Programme-neutral safeguards on LCJMF land: (i) install one empty 33 kV duct to a capped spur-node now; or (ii) safeguard a Reserved Strip with HDD sleeves + draw-ropes at hard crossings, pull-pits, as-builts, and deemed-consent step-in (safety-objection carve-out). E) Distinct sterilisation head (easement + offsets + halos), indexed, including professional fees and reasonable management time.
— 3.2A Flood Zone comparison – inconsistent			

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
application of Sequential Test —			
APP-054 / APP-277 (Annex D Fig.7) / APP-079 / APP-285; Applicant reply excerpt	*Applicant narrative (kept): Overall site is "<50% FZ2+FZ3"; LCJMF's offered parcels are mostly FZ3 with only small FZ2/FZ1 (Ex22). EN-1 §§5.8.21–5.8.23 does not require like-for-like comparison of all parcels; "reasonably available" must reflect objectives/timescale. Applicant's objective includes an internal ≥25% FZ1 to host BESS and Onsite Substation (Site Selection §3.5.3).*	What we ask the ExA to test (proportionate). A narrow, like-for-like Sequential Test parity check for BESS siting only: Applicant's chosen BESS vs LCJMF's FZ1 BESS parcel (with associated ALC 3a/3b PV ~2.7 km from PoC). Why needed. The headline "FZ2+FZ3 <50%" blends FZ2 and FZ3 and masks that the solar array area is ~49.7% FZ3 and only ~4.5% FZ2 (Ex6). By contrast, LCJMF's proposed BESS parcel is wholly FZ1 (Ex22). Policy footing. EN-1 (2023) §§5.8.21–5.8.23, read with updated PPG, supports a targeted, proportionate Sequential Test on "reasonably available" alternatives—precisely this FZ1 BESS option. On Applicant points: (i) "Much of your wider land is FZ3" is beside the point—the test is the BESS plot, not wholesale relocation. (ii) The ≥25% FZ1 bar is an internal screen, not an NPS threshold; Sequential Test asks whether an FZ1 BESS location was reasonably available post-BFS (NaFRA2 Jan-2025 already in evidence). (iii) Availability/suitability/achievability are met: parcel offered (Nov-2021; refreshed Aug-2023), FZ1 for BESS, 3a/3b PV proximate, 2.7 km to PoC; a paper-only parity check does not delay CNP.	Proportionate next step (no programme impact): produce a 1-page Sequential Test parity table comparing: BESS (chosen) vs BESS (LCJMF FZ1) on: Flood Zone (fluvial/tidal), NaFRA2 surface-water risk (Jan-2025), land control/availability, deliverability/timescale; and Associated PV (ALC/BMV, trench distance/losses at partial scale). If FZ1 BESS is preferable without schedule harm, then either: (A) adopt minor future-proofing on LCJMF land now (33 kV spur/duct + mapped spur-node; or Reserved Strip + HDD sleeves/pull-pits + as-builts + deemed-consent step-in), or (B) provide a reasoned engineering/safety basis for declining and propose an alternative safeguard, including a fallback sterilisation mechanism (PV/BESS opportunity loss on easement + offsets + halos, indexed, incl. professional/management costs). Why this matters: transparently applies EN-1/PPG Sequential Test to BESS siting, avoids re-opening the corridor later, and does not affect CNP timelines.

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
— 3.3 ALC/BMV evidence — why the Applicant's mapping is wrong —			
APP-257 (policy compliance), REP1-030 (Alt's – AP6), APP-054 / APP-279; Applicant reply excerpt	*Applicant narrative (kept): Minimising BMV was a key consideration. Broad-area screening used NE 1:250k provisional ALC mapping; this is proportionate/precedented at site-selection stage. EN-1 §§5.11.12 / 5.11.34 do not require site-specific surveys; doing so then would have delayed a CNP scheme. Later field surveys (LRA 2024; Viking Link post-works) post-date selection.*	**Field-scale evidence existed at the material time.** SES 2021 (Ex2)—contemporaneous with early optioning—records 96.1% Grade 3a / 3.9% Grade 2 on AGR3, and LCJMF notified LC in 2021 that wider parcels are predominantly Grade 3 (Ex17–Ex18). Best-available evidence at field scale. The 1:250k layer is indicative and mis-shaded key fields (e.g., Far 52 mapped Grade 1 vs surveyed Grade 3a) (Ex2, Ex2b, Ex4). EN-1 (read with PPG) expects proportionate use of best-available evidence when describing impacts and reasonable alternatives; here, that is the field data already on the record (SES 2021; LRA 2024: 72% 3a / 28% 3b on contiguous parcels; Viking Link pre/post works: mostly 3a with some 2) (Ex2b, Ex4). Proportionate check, not a re-survey. We seek a short ALC/BMV parity table using evidence already before the ExA to compare: (i) Applicant's chosen parcels vs LCJMF 3a/3b parcels (partial PV/BESS alternative); and (ii) BESS siting where an FZ1 parcel exists on LCJMF land. Planning balance. If desktop mapping overstated BMV on LCJMF land, a partial 3a/3b alternative would reduce BMV take relative to Applicant's assumed baseline—engaging EN-1 §5.11's avoid/minimise BMV principle.	Direction/relief sought (programme-neutral): (A) ExA to require a one-page ALC/BMV parity table (draw only on Ex2, Ex2b, Ex4 and Applicant's ALC evidence) comparing the partial LCJMF alternative with the chosen layout, with reasons recorded. (B) If parity shows lower BMV harm on LCJMF's 3a/3b parcels without schedule impact, invite the Applicant to: (i) adopt future-proofing on LCJMF land now (33 kV spur/duct + mapped spur-node, or Reserved Strip + HDD sleeves + pull-pits + as-builts + deemed-consent step-in), or (ii) supply a reasoned basis for declining and propose an alternative safeguard, including a fallback sterilisation mechanism (easement + offsets + halos; indexed; incl. professional/management costs).

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
— 3.4 Regional BMV and Flood Zone 3 Baseline Comparison —			
APP-277 (Appendix 2, Annex D 'All-Constraints'), APP-054/079/285; Applicant reply excerpt	*Applicant narrative (kept): EN-1 (2023) §§5.11.12/5.11.34 don't require site-specific ALC; references to 2011 EN-1 are obsolete; LCJMF parcels largely FZ3/2.*	EN-1 (2023) provisions supporting a proportionate parity check. We rely on §4.3 (Alternatives) – proportionate information on reasonable alternatives and reasons; §4.2 (Good design) – minimise adverse effects/inefficient routing; §5.8 (Flood risk) – proportionate Sequential Test of reasonably available sites; §5.11 (Agricultural land/BMV) – avoid/minimise BMV with appropriate evidence. Why the regional baseline matters. Applicant's own 'All-Constraints' material shows ~565.8 MW of nearby PV/BESS predominantly in Flood Zone 3 (Ex7), establishing the cumulative baseline. Against that, LCJMF's mixed ALC 3a/3b PV + FZ1 BESS ~2.7 km from PoC is a more efficient partial alternative: reduced BMV take; shorter cable runs/trenching; avoid longitudinal LWS 4722 occupation (Ex49–Ex52). Flood-zone scope (what's at issue). The test is not whether all LCJMF land is FZ1; it is whether a reasonably available FZ1 BESS parcel exists with proximate 3a/3b PV—it does. BMV evidence standard. EN-1 §5.11 doesn't force new surveys, but expects sound, proportionate evidence. Field-scale ALC already before the ExA (SES 2021; LRA 2024;	Specific, quantified exercise sought (programme-neutral): Produce a one-page matrix comparing (i) Applicant's chosen layout with (ii) a partial LCJMF alternative (PV on 3a/3b + BESS in FZ1), reporting: • BMV/ALC differentials; • Flood-zone differentials (BESS explicitly FZ1); • Trench length/cable haul & LWS-4722 interaction; • Indicative construction logistics (HGV/stone) where already calculated. Inputs come from APP-079 / APP-285 / APP-277 and Ex2/2b/4/7/49–52. Direction sought: ExA to request and the Applicant to provide this matrix and record reasons per EN-1 (2023) §§4.2, 4.3, 5.8, 5.11—informing the public-interest balance without delay to CNP delivery.

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
		Viking Link) indicates predominantly 3a/3b on LCJMF parcels—higher fidelity than the 1:250k layer.	
— 3.5 Cumulative rationale and duty to revisit —			
APP-054 §3; REP1-030 (AP6)	*Applicant relies on prior alternatives work; no revisit needed post-BFS.*	**Material change since 2021.** LC rejected the Nov-2021 offer on "cumulative" grounds when local TEC ≈ 99 MW (Ex13). By Aug-2024 TEC > 2.1 GW (Ex14); BFS withdrawn; 600/600 MW connection retained with 400 MW PV (headroom; Ref F). EN-1 §4.3.15, §§4.3.26–4.3.29 require proportionate re-appraisal in light of this change. None appears in APP-054/079/285 or REP1-030.	A targeted refresh: one-page matrix re-testing LCJMF partial, proximate options against LC's choice (BMV/FZ/trench/LWS/logistics), using record evidence only.
— 3.6 Applicant filters (≥300 ha / 10 km) —			
APP-277 (Appx 2)	*Internal sieves ensured deliverability.*	Not policy tests. The ≥300 ha and 10 km screens are internal, not EN-1 thresholds. PAS-2 (277 ha) was assessed (Ref C), proving ≥300 ha is not determinative. LCJMF's smaller proximate parcels (≤2.7 km to PoC) should have been appraised like-for-like. Option 3 uses Little Hale Drove (Ex50), overlapping LCJMF land.	A like-for-like Red Amber Green (RAG) comparing Beacon Fen North vs LCJMF parcels on ALC/BMV, FZ, cable length, LWS crossings, operational access, AIL logistics—rather than exclusion at Stage 1 by a non-policy screen.

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
— 3.7 Flood Zone treatment is not a bar —			
APP-054/079/285; REP1-030	*Flood considerations addressed; PPG/Sequential Test applied proportionately.*	Configuration, not relocation. EN-1 §§5.8.21–5.8.23 support a proportionate Sequential/Exception Test on reasonably available options. LCJMF identifies BESS wholly in FZ1 with adjacent ALC 3a/3b PV 2.7 km from PoC—a lower-risk, shorter-cable partial configuration that should have been comparatively tested.	A 1-page Sequential-Test parity table: BESS (chosen) vs BESS (LCJMF FZ1), and associated PV (ALC/BMV + trench deltas).
— 3.8 Apply the sieve consistently —			
APP-277 (Stage 1 sieve)	*BFN meets Stage-1 (non-BMV proportion).*	Consistency. Beacon Fen North only narrowly meets Stage 1 (52.6% non-BMV; Ref B). Closer mixed-grade LCJMF parcels would shorten trenching, reduce LWS interactions, and improve ops. EN-1 §4.3.15, §§4.3.26–4.3.29 favour a comparative check, not rigid sieve exclusion.	Direct LC to supply a like-for-like quantified matrix (BMV/FZ/trench/LWS/ops/AIL) for BFN vs LCJMF; record reasons.
— 3.9 System sizing & headroom —			
Ref F; Ex16–Ex22, Ex21	*LC states BESS "already allocated".*	Unsubstantiated headroom claim. Post-BFS 600/600 retained with 400 MW PV (200 MW headroom). LCJMF's Aug-2023 BESS-only offer sought to align with that headroom; LC replied BESS already allocated (Ex21) but provided no allocation/curtailment evidence. EN-1 §4.3 and	Ask the ExA: (i) require a short Headroom Annex (allocation schedule, curtailment basis, residual capacity); (ii) if headroom exists, secure spur/duct safeguards on LCJMF land (33 kV duct + mapped spur-node or Reserved Strip + HDD sleeves/pull-pits + as-builts + deemed-consent step-in).

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
		§§5.8.21–5.8.23 warrant a proportionate appraisal of the FZ1 BESS option.	
— 3.10–3.14 Parallel projects / Aug-2023 offer / hybrid corridor / co-location —			
Ex42–Ex54; Ex11–Ex22; Ex49; Ex61	*Applicant points to prior responses; maintains EN-1 compliance.*	Live proximate offers not quantified. LCJMF repeatedly offered FZ1 BESS, a hybrid corridor (Little Hale Drove), and co-location (data centre, glasshouse, private-wire) aligned with ~200 MW headroom. Aug-2023 offer (618 ac) acknowledged (Ex19) but no quantified comparison appears in APP-054/079/285; agent later said "not looking for any more land at this stage" (Ex20). After BFS withdrawal, requests to include LCJMF land were not re-tested.	Ask the ExA (programme-neutral): require LC to provide: (A) a one-page like-for-like matrix (LC choice vs Option-3 vs LCJMF hybrid vs LCJMF partial) with BMV/FZ/trench/LWS/logistics metrics; (B) the Headroom Annex; (C) either adopt future-proofing on LCJMF land now (33 kV duct + spur-node / Reserved Strip + HDD sleeves + pull-pits + as-builts + deemed-consent step-in) or give a reasoned engineering/safety basis for declining plus a fallback sterilisation mechanism (easement + offsets + halos; indexed; incl. professional/management costs).
— 3.15 Flood risk baseline materially worsened (NaFRA2 2025) —			
AS-022 (Climate Change Allowances & NaFRA2 Review); Doc 9.6 (Responses to ExQ1 WFR.1.1)	*Applicant narrative (kept): NaFRA2 became available mid-2025 after site selection; implications are addressed in AS-022; scheme aligns with latest flood-risk guidance (see Doc 9.6).*	**Timing isn't a get-out;** decisions use the current baseline. Under EN-1 (2023) the ExA/SoS determine on the latest evidence. NaFRA2 (Jan–Mar 2025) materially increases surface-water extents over the chosen layout (Ref E / Doc 9.1). AS-022 considers mitigation	Direction sought (programme-neutral): require a one-page NaFRA2-based addendum: Table A – Sequential parity: Chosen BESS vs LCJMF FZ1 BESS, reporting FZ 1/2/3 exposure, NaFRA2 depth/extent, residual risk post-mitigation.

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
		for the selected scheme but does not re-apply the Sequential/Exception Tests against LCJMF's BESS-in-FZ1 partial alternative (Ex22) with nearby ALC 3a/3b PV (~2.7 km to PoC). The Sequential Test isn't "mitigate only"; it first asks if a less vulnerable configuration exists meeting objectives. Consultation record: LCJMF's 21 Dec 2023 letter (Ex25) set seven routing/capacity/BESS queries; 23 Jan 2024 reply (Ex26) deferred to generic PEIR text, providing no site-specific, quantified appraisal. With NaFRA2 now in play, the omission is amplified.	Table B – Delivery parity: objective fit, cable length deltas (~2.7 km proximity), LWS 4722 interaction, indicative logistics (HGV/stone where already calculated). If the FZ1-BESS alternative scores better on flood risk without schedule harm, either: (i) adopt future-proofing on LCJMF land now (33 kV duct + mapped spur-node / Reserved Strip + HDD sleeves + pull-pits + as-builts + deemed-consent step-in), (ii) provide a reasoned engineering/safety basis for declining and propose an alternative safeguard, incl. a fallback sterilisation mechanism (easement + offsets + halos; indexed; incl. professional/management costs).
Applicant D2 doc (EL ID)	*Issue*	LCJMF comment	Consequence / Ask
— 3.X Summary of LCJMF alternatives offered & Directions sought (Alternatives) —			
Record of offers: Ex1; Ex8–Ex9; Ex16; Ex18; Ex11–Ex12; Ex22; Ex49–Ex52	*Applicant position (kept): No obligation to produce further comparative documents; site selection "settled"; EN-1 §§4.3.22–4.3.23 already satisfied.*	Offers lodged and live during the relevant windows. • Nov 2021: 516 ac PV+BESS, 2.7 km to PoC, ALC 3a/3b, FZ1 BESS (Ex1; Ex8–Ex9). • Aug 2023: 618 ac expanded offer, FZ1 BESS (Ex22), hybrid corridor (Ex11–Ex12; Ex49–Ex52), submitted during statutory consultation (Ex16; Ex18).	Directions sought (programme-neutral; suitable for Rule 17): A1. Require a quantified alternatives matrix comparing the Applicant's design with LCJMF Nov-2021 and Aug-2023 offers (Refs A–C; F). A2. Direct Flood Zone (NaFRA2 baseline) and ALC/BMV parity tables comparing Applicant parcels vs LCJMF parcels (Refs A–E).

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
		Why proportionate information is still required now. Under EN-1 (2023), applicants must provide proportionate information on reasonable alternatives and reasons for choice for the scheme as examined (post-BFS; with NaFRA2 2025). A short, quantified comparison using material already before the ExA is the proportionate way to discharge that duty.	A3. Clarify sieves: confirm ≥300 ha and contiguity are not policy tests and were applied internally (EN-1 §4.3.22; Refs A–C). A4. Require site-selection reconsideration addendum in light of NaFRA2 2025 / Doc 9.1 (Ref E) with an explicit comparison to LCJMF's FZ1 BESS element. Procedure: invite via Infrastructure Planning (Examination Procedure) Rules 2010, Rule 17—a concise, two-table return (documentation, not redesign), preserving CNP timelines.
— 4. Environmental Matters (APP-079) (Ref E) —			
— 4.1 LWS 4722 (Option 1 only) —			
APP-079 (ES), REP1-029; Ex35–Ex38; Ex49–Ex52; Ex50; Ex36–Ex37	*Applicant points to REP1-029 in response to LWS 4722 issues.*	**REP1-029 doesn't answer the quantitative comparison.** Option 1 enters LWS 4722, places CC4 within its boundary, and entails ≈ 1.19 km of in-LWS HGV haul (Ex35–Ex38). Option 3 and LCJMF Aug-2023 hybrid avoid longitudinal occupation, crossing Old Forty Foot Drain (LWS 4490) at right angles only (Ex49–Ex52; Ex50). The ES/REP1-029 do not quantify: (i) LWS length/area affected for each option; (ii) HGV passes / imported stone tonnage / duration of in-LWS haul; (iii) cumulative	Proportionate Rule 17 remedy (no programme impact): 2-page LWS comparison pack using Applicant-held data: Table A – LWS metrics: LWS length/area affected; crossing count/type; HDD vs open-cut; construction duration. Table B – Construction logistics: in-LWS HGVs, stone tonnage, compound/access adjacency. Table C – Cumulative: Viking Link re-use within LWS 4722 (HGVs/stone/soil handling) and reinstatement interactions. Minimum design safeguards if Option 1 retained: Relocate CC4 outside LWS buffer; right-angle crossings only; no longitudinal haul within LWS; secure via Construction Environment Management Plan / Construction Traffic Management Plan: LWS-specific access controls, haul-road material limits, seasonal

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
		overlap with Viking Link and CC4 within the same LWS 4722 footprint (see Ex36–Ex37 overlays). Policy tests engaged. EN-1 (2023) good design/proportionality; EN-1 biodiversity mitigation hierarchy (avoid → minimise → compensate) supports right-angle crossings over longitudinal runs; EIA Regs require reasonable alternatives with main reasons for selection—i.e., side-by-side metrics, not narrative alone.	windows, ecologist-led watching brief, reinstatement standards with verifiable success criteria. Bottom line: REP1-029 is a pointer, not a quantitative answer; EN-1/EIA require the short matrices, or else adopt the Option 3 / LCJMF right-angle solution to satisfy the mitigation hierarchy.
— 4.2 Repeat-corridor cumulatives — Viking Link —			
APP-079 (ES), REP1-029; PINS Advice on CEA; Ex34–Ex38	*Applicant narrative (kept): Per PINS CEA Advice, completed schemes are treated as baseline; soils impacts addressed in REP1-029.*	Baseline ≠ no in-combination assessment. Treating Viking Link (VL) as baseline sets receptor as-left condition; it does not remove the duty to assess additional disturbance from re-opening the same corridor within a short recovery window (soils, hydrology, LWS 4722). Why it matters: (i) Slow recovery — subsoil compaction/drainage disruption from 4,800 t aggregate (VL haul/compounds; Ex34) can be multi-year; (ii) Same footprint, second hit — CC4 directly overlaps the VL route; CC5 lies across the South Forty Foot Drain, adjacent to the prior compound (Ex35–	Proportionate, programme-neutral addendum (Rule 17): 1) Quantify repeat-use cumulatives for CC4/CC5: HGV trips; stone volumes; haul lengths; LWS length/area under traffic; predicted bulk-density change/recovery timeline. 2) Compare alternatives: Option 1 (longitudinal LWS occupation/re-use) vs Option 3 / LCJMF hybrid (right-angle crossings; no longitudinal LWS occupation). 3) Set repeat-use controls: relocate CC4 off LWS; right-angle LWS crossings only; pre-installed HDD sleeves/draw-ropes at hard crossings; seasonal soil-moisture windows; granular-import limits; independent as-left soil testing & hydrology monitoring. 4) Commit to use VL as-built data (haul alignments, aggregate depths, compaction readings) to inform design and the Outline CEMP/Soil Management Plan. Bottom line: VL as baseline +

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
		Ex38) → a temporal cumulative on the same receptors; (iii) EIA duty — even if VL is baseline, the ES must still evaluate likely significant cumulative effects where residual effects persist. What's missing: no quantified "greenfield vs repeat-use" comparison for the LWS 4722 / Old Forty Foot Drain corridor: HGV trips & stone tonnage relative to VL (4,800 t); soil structure/bulk density & recovery window; hydrological pathways (drain crossings/dewatering/interception); LWS length/area under repeat haul/compound; residual VL impacts elevating sensitivity.	additional disturbance must be assessed; a short addendum closes the gap without affecting CNP timelines.
— 4.3 Regional cumulatives —			
APP-069 (ES Ch.18 Cumulative Effects), REP1-029; Table 18.3	*Applicant narrative (kept): Cumulative assessment provided, including with Heckington Fen Solar NSIP (consented Jan-2025); Table 18.3 summarises inter-cumulative effects.*	High-level summary ≠ decision-grade cumulative for adjacent NSIPs. APP-069/Table 18.3 are largely narrative, lacking receptor-specific, quantified analysis for two near-contemporary, neighbouring NSIPs. What's missing (illustratively): (i) Agricultural land/soils: no combined ALC/BMV tally, no cumulative soil structure/compaction risk where haul routes/compounds/reinstatements coincide or adjoin. (ii) Traffic/haulage: no integrated construction programme, daily/peak HGV totals, junction stress tests, or diversion sensitivity for phasing slips.	Rule 17, proportionate addendum (programme-neutral): 1) Provide quantified cumulative matrices (construction & operation) for soils/ALC loss, traffic (AADT/HGV, peak-hour), LVIA (paired viewpoints incl. night lighting), ecology (LWS length/area; crossings), PRoW/community receptors. 2) Map overlapping/adjacent compounds, haul roads, access nodes; include a combined construction schedule identifying concurrency. 3) Commit to co-ordinated mitigation with Heckington Fen: stagger peak HGVs, relocate/resize compounds to avoid LWS/PRoW pinch-points, right-angle LWS crossings only, shared reinstatement specs, joint community liaison. 4) File a short Statement of Common Methodology with Heckington Fen to close scope gaps left by Table 18.3. Outcome: a decision-grade cumulative picture consistent with EN-1 proportionality—documentation, not redesign.

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
		(iii) Landscape/LVIA: no paired-view in-combination visibility or night lighting analysis; limited sequential views on key routes/PRoWs. (iv) Ecology networks: no corridor-scale LWS/ditch connectivity, barrier effects, or sequential disturbance (including repeat use of drains/berms). (v) Community resilience: no combined effects on farm access, severance, dust/noise peaks, or emergency access during concurrent works. Why it matters: Two large NSIPs in the same landscape/timeframe can cause material in-combination effects even if each is acceptable alone. EN-1 (2023) requires proportionate but sufficient evidence; a high-level table without metrics is not sufficient here.	
— 4.4 Soils —			
APP-065 (ES Ch.14 Soils & Agricultural Land) §14.3.15; APP-176 (Outline Soil Management Plan 2024); Draft DCO Req.16; APP-079 (Corridor Appraisal); REP1-029	*Applicant narrative (kept): ES soils assessment is desk-based; detailed pre-construction soil survey to be secured via Req.16 and APP-176. LCJMF's alleged discrepancies should be supported by submission of full third-party (RHE) reports. APP-079 already explains why LCJMF's alternative route was not preferred; further comparative analysis not necessary.*	**Baseline & evidence exist now (not just "desk-based").** The record already includes decision-stage, site-specific evidence on the same corridor: (i) pre/post Viking Link soil surveys (Ex4), (ii) NDVI (3 Oct 2023) showing persistent vegetation stress along the reinstated strip (Ex27), (iii) field photos (21 Oct 2023) evidencing waterlogging on-corridor vs controls (Ex28–Ex33), and	Directions sought (Environment) — programme-neutral: E1. ES addendum table comparing Option 1 vs Option 3 vs LCJMF Aug-2023 hybrid on the metrics above (drawn from Ex4, Ex27–Ex33, Ex34, Ex49–Ex52, Ex55–Ex60). E2. Baseline reconciliation: record any ES/RHE variances and commit to seasonally appropriate re-survey where indicated, applying the precautionary principle where uncertainty remains. If Option 1 retained: strengthen CEMP/Soil Plan with repeat-use controls (granular import limits, moisture-window working, independent as-left soil testing, hydrology monitoring) and avoid longitudinal LWS haul.

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
		(iv) RHE independent walkovers/desk studies (Ex55–Ex60). This material should inform option selection and cumulative assessment now, not be deferred to post-consent plans. Repeat-use matters. Re-occupying the Viking Link strip (4,800 t prior stone imports; Ex34) risks cumulative compaction, drainage impairment, and LWS disturbance. A future Soil Management Plan does not answer the examination question: whether Option 3 / LCJMF hybrid would avoid or reduce these impacts. Proportionate quantified comparison. EN-1 (2023) expects proportionate but sufficient evidence. A short, metric-led comparison can be produced from material already on file, comparing options on: • HGV movements & stone tonnage; • LWS length/area affected; • Soil metrics (bulk density/penetrometer ranges) where the corridor is re-used vs avoided; • Reinstatement passes & hydrology indicators (ponding extent/duration).	
— 5. Consultation (APP-277) (Refs A–E) —			
APP-046 – APP-048; AS-018 (Consultation Report & apps); AS-095 (Land Interest	*Applicant narrative (kept): No alleged s44 breach; consultation approach set out in APP-046–048/AS-018. Engagement with LCJMF evidenced (Ex63); land-rights*	No s44 allegation — the issue is formative timing and adequacy. LCJMF's policy-aligned, proximate alternatives (Nov-2021; Aug-2023) were not engaged	Directions sought (proportionate; programme-neutral): C1. A two-page consultation adequacy note setting out: (i) timeline (offers vs Applicant milestones), (ii) how each LCJMF

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
Engagement Schedule); REP1-029	*negotiations sensibly progressed once Order limits known; alternatives adequately considered under EN-1 §§4.3.22–4.3.23.*	at a stage when they could shape route/siting before Order limits were effectively fixed. Sequencing (documented): Nov-2021 516 ac offer (2.7 km to PoC) + corridor rights context (Ex1, Ex44); Aug-2023 618 ac re-offer incl. FZ1 BESS + hybrid corridor (Ex16–Ex20); Nov–Dec 2023 site-specific appraisal requested → generic PEIR reply (Ex24–Ex26); LIQ Aug-2023, targeted consultation Jan–Mar 2024; HoTs Jan-2025; substantive discussions Sep-2025 (AS-095; Ex62–Ex63). Saying engagement waits on fixed limits is circular—landowner alternatives (shorter cable, FZ1 BESS, avoid longitudinal LWS) are inputs to setting those limits. The Ex24 quote (“dialogue is now happening…”) shows dialogue came after key choices advanced; it is not evidence that LC tested LCJMF’s alternatives when it mattered. Evidence gap: no short, like-for-like appraisal (RAG/ALC/FZ/LWS/cable length/land interests) and no note of design change attributable to LCJMF input.	alternative (Nov-2021, Aug-2023, Nov-2023 BESS-only) was assessed, (iii) any design changes adopted/rejected with reasons. C2. A concise alternatives matrix (chosen route vs LCJMF options) using only existing evidence (APP-054/079/277/285 + Ex1/16–20/44/62–63), covering ALC/BMV, Flood Zones (NaFRA2), LWS interactions, trench/cable length, AIL/logistics, land interests. Rationale: aligns with EN-1 expectation that alternatives information be sufficient and capable of influencing design, without delaying CNP delivery.

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
— 5. Consultation (APP-277) — Effect on LCJMF, Evidence base, Directions sought —			
APP-046–APP-048; AS-018 (Consultation Report & apps); AS-095 (Land Interest Engagement Schedule); REP1-029	*Applicant narrative (kept): Consultation adequate; no s44 breach; engagement occurred and is evidenced; additional documents "not justified nor proportionate."*	No s44 allegation — the problem is formative timing and adequacy. By the time focused engagement with the freehold/occupier began, routing/siting choices were already advanced. Reasonable alternatives capable of reducing flood risk, BMV take, and LWS occupation (the Nov-2021 and Aug-2023 LCJMF offers) were not tested at a formative stage, limiting consultation's ability to influence the design (Refs A–C). Evidence base: AS-095 shows first substantive engagement with LCJMF late-2023; Heads of Terms only 2025. Ex62–Ex63 show sustained 2023–2025 attempts to engage. Together, the documents evidence late landowner engagement, not a procedural s44 defect. The stance that engagement must await fixed Order limits is circular: the LCJMF alternatives (proximate PV+BESS, FZ1 BESS, hybrid corridor) are inputs to setting those limits.	Directions sought (Consultation) — proportionate Rule 17 clarifications (clerical, not redesign): C1. Consultation Addendum (1–2 pages): For each LCJMF alternative (Nov-2021; Aug-2023 proximate PV+BESS / FZ1 BESS / hybrid corridor), set out date received, any like-for-like testing undertaken (or none), and reasons for rejection (Ex1; Ex16–Ex22; Ex11–Ex12; Ex49–Ex52; Refs A–C). C2. Consolidated timeline (1 page): Cross-reference AS-095 with Ex62–Ex63 to show when design-shaping engagement with the freehold/occupier actually occurred and summarise responses to LCJMF's specific alternatives. C3. Third-party proxy confirmation: State whether dialogue with ib vogt (or others) was treated as a proxy for ss42/44 engagement with LCJMF; if so, explain how landowner alternatives could still influence design (Ex42–Ex43). Why proportionate/necessary: Meets EN-1 (2023) §§4.3.22–4.3.23 proportionality; uses existing record only; no programme risk; material to the planning balance on alternatives.
— 6. Integration and Grid Efficiency (APP-285) (Refs D, F–H) —			
APP-278 (Design & Access Approach);	*Applicant narrative (kept): Good design principles acknowledged (APP-278).*	Correcting references & framing. Noted: APP-285 has no §4.5. Our reliance is on EN-1 (2023) Part 4	Programme-neutral future-proofing (two routes): Primary (now):

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
APP-285 (Electricity Grid Connection Statement)	*Applicant disputes that EN-1 (2023) §§4.2–4.4 require installing "spur-ready nodes / parallel 33 kV ducting," and queries reference to APP-285 §4.5 (no such section).*	(Design) and the Applicant's own APP-278. These require efficient, future-proof design that minimises re-entry and makes efficient use of existing corridors. We do not argue EN-1 "mandates ducts"; we submit EN-1 supports proportionate future-proofing where it avoids foreseeable second-pass disturbance and improves network efficiency. Context: LCJMF land is 2.7 km from Bicker Fen PoC, directly adjacent to Viking Link (1.4 GW), Triton Knoll (857 MW) and AGR3 (49.9 MW PV+BESS). Co-location potential is exceptional; yet no spur/duct safeguard has been tested or secured. Why EN-1 design principles fit here: (i) Least disturbance — avoid reopening the 400 kV corridor (soils/hydrology/LWS); (ii) Efficient integration — enable proximate behind-the-meter or iDNO links without future trenching in the same sensitive strip; (iii) Proportionate — a single reserved strip + HDD sleeves now is de-minimis cost/complexity for the Applicant, high value for cumulative-impact reduction.	Install one parallel 33 kV iDNO-compatible duct across the LCJMF section to a mapped, capped spur node (2.7 km from PoC), laid concurrently with export works. Fallback (rights if no duct now): Protective Provisions to: (a) reserve a mapped 'Reserved Strip' with a simple no-build/clearance standard; (b) pre-install HDD sleeves with draw-ropes at all hard crossings (highways, drains, PRoWs, utilities) + pull-pits and as-built records; (c) grant an Option/step-in for LCJMF or its nominated iDNO to install later via deemed consent after [30] days' notice, with any objection determined by an independent engineer limited to safety/engineering feasibility. Drafting policy (Requirement / Protective Provision text): "The Undertaker shall (i) reserve a [x m] wide 'Reserved Strip' for a future 33 kV spur as shown on [Plan], kept free to [clearance standard]; (ii) install HDD sleeves with draw-ropes at all highway, drain, PRoW and utility crossings intersected by the Reserved Strip and provide as-built records; and (iii) grant LCJMF or its nominated iDNO an option to install a 33 kV cable within the Reserved Strip following [30] days' notice, with any objection determined by an independent engineer limited to safety or engineering feasibility." Compensation neutrality: This safeguard is separate from sterilisation/fee heads. Outcome: Aligns with EN-1 Part 4 good-

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
			design aims (efficiency, resilience, least disturbance) without delaying CNP delivery.
— 6.1 Headroom under 600 MW / 600 MW configuration —			
APP-278 (Design & Access Approach); REP1-030 (AP7); APP-285 (Grid Conn. Statement)	*Applicant narrative (kept): 600 MW import / 600 MW export; 400 MW PV; 600 MW BESS. Disputes any obligation to provide "spur-ready nodes."*	Policy footing (EN-1 2023, Part 4 – good design): We are not invoking 2011 EN-1 and not asking for a 400 kV interlock. EN-1's design principles favour efficient, future-proof layouts that avoid foreseeable second-pass disturbance. Headroom context: With 600/600 connection and 400 MW PV, operational headroom/ utilisation should be transparently explained and, where practicable, safeguarded for proximate demand (data centre, BESS, glasshouse heat-reuse) so the 400 kV corridor isn't re-opened. Independent system view: NGET Rule 17 response (21 Oct 2025) notes the arbitrage/BESS approach can be fulfilled on the applicant's connection; a single large hybrid connection is efficient; and suggests NESO may add further comment. This supports efficient co-location/ future-proofing rather than sealing the corridor.	Directions sought (programme-neutral): H1 — Utilisation statement: Require a short technical note setting out, in plain terms, how 600 MW import / 600 MW export with 400 MW PV / 600 MW BESS will be utilised over time, and whether unallocated headroom (import/export) could be assigned to proximate final demand without re-entering the 400 kV corridor. H2 — Future-proofing safeguard: If the Applicant will not install a duct now, include Protective Provisions to: (i) reserve a mapped 'Reserved Strip' on LCJMF land with a simple no-build/clearance standard; (ii) pre-install HDD sleeves with draw-ropes at all hard crossings (highways/drains/PRoWs/utilities) with pull-pits and as-built records; (iii) grant a step-in/option for LCJMF or its nominated iDNO to install a 33 kV spur later on deemed consent after [30] days' notice, with any objection determined by an independent engineer limited to safety/engineering grounds. Rationale: Aligns with EN-1 Part 4 good-design aims; consistent with NGET's efficiency framing; commercially and programme-neutral; avoids foreseeable re-entry and sterilisation.

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
— 6.2 Operational access and efficiency —			
APP-060 (Ch.9 Access & Traffic); APP-278 (Design & Access Approach)	*Applicant narrative (kept): Residual traffic effects are "negligible"; good-design approach set out in APP-278.*	EN-1 (2023) Part 4 – good design still applies beyond EIA thresholds. Even if residual effects are "negligible," good design requires efficient layouts, shorter operational mileages, and future-proofing to avoid corridor re-entry. Proximate option: Locating BESS / spur-node on LCJMF land 2.7 km from Bicker Fen, adjacent to AGR3/Viking Link, would (i) shorten O&M and first-responder routes, (ii) reduce export cable length, (iii) avoid longitudinal occupation of LWS 4722 (vs Option 1), and (iv) limit repeat-use impacts in the Viking Link corridor. Field ALC shows LCJMF parcels are mostly 3a/3b; NaFRA2 (2025) supports FZ1 BESS here.	Directions sought (programme-neutral): Ops/BESS Annex — one-page quantified comparison of current BESS vs LCJMF FZ1 BESS on: annual O&M vehicle-km; AIL/escort distances; first-responder time bands; corridor re-entry frequency; indicative lifetime O&M CO_2. ALC/BMV Parity Table — one page using existing field surveys (SES 2021; LRA 2024; VL pre/post) comparing Applicant parcels with LCJMF 3a/3b parcels for a partial PV/BESS alternative. Flood Parity Note — like-for-like Sequential/Exception Test: current design vs FZ1 BESS + associated PV (NaFRA2 baseline). LWS/Corridor Note — Option 1 vs Option 3 vs LCJMF hybrid: LWS length/area within working width; HGV/stone tonnage; reinstatement passes; soils/hydrology indicators. Protective Provisions (if redesign resisted): (1) map a Reserved Strip on LCJMF land with objective clearances; (2) HDD sleeves + draw-ropes at all hard crossings now, with pull-pits and as-builts; (3) deemed-consent step-in right for LCJMF/iDNO to install a 33 kV spur later (independent engineer to resolve safety/engineering only); (4) a separate indexed sterilisation head (PV/BESS) plus indemnity-basis professional fees and reasonable management time.

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
— 6.3 Abnormal Indivisible Load (AIL) logistics —			
APP-060 (Ch.9); APP-278 (Design & Access Approach)	*Applicant narrative (kept): Access strategy "fully considered"; bespoke access road proposed; EN-1 §4.5.3 (marine) said to be irrelevant.*	Good design (EN-1, 2023 Part 4) still requires efficient, least-impact logistics. AIL convoys (transformers/BESS plant) are a discrete construction risk. Proximate siting on LCJMF land 2.7 km from the PoC could: (i) shorten AIL route distance/time, reducing police-escort hours and highway disruption; (ii) avoid/lessen A17 interface works and TM durations; (iii) reduce corridor occupation length (incl. within/near LWS 4722), cutting HGV passes and soil/hydrology risk; (iv) lower cumulative disturbance in the Viking Link corridor. This is a narrow, programme-neutral comparison, not a redesign request.	Direction sought (AIL Logistics Note, 1–2 pages): Compare current design vs proximate LCJMF siting on: (1) AIL route km and convoy minutes; (2) number/duration of TM interventions (escorts/closures); (3) any A17 works otherwise required; (4) HGV/corridor passes within/adjacent to LWS 4722; (5) cumulative heavy-vehicle movements in the Viking Link corridor. If redesign is resisted, secure Protective Provisions to minimise AIL impacts on LCJMF land (defined AIL route window, LWS right-angle crossings only, seasonal soil-moisture constraints, and independent as-left verification).
— 6.4 Documented integration opportunities —			
APP-285 (Grid Connection Statement); APP-278 (Design & Access Approach)	*Applicant narrative (kept): Integration with Viking Link/Triton Knoll limited to crossings; PP to be agreed; separate AGR3 interface discussions underway.*	**This is not about using Viking Link /Triton Knoll cables**. Integration = construction/interface coordination on LCJMF land: shared/managed A17 access, co-lay/pull-through a spare 33 kV duct with a capped spur to LCJMF boundary, trenchless LWS4722	Design/consenting actions (proportionate, inside red line): (1) Design Principle – Integration & Reserved Right: deliver one spare 33 kV duct and capped spur to LCJMF boundary at

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
		crossings, and siting rules (no link boxes/joint bays in headlands) to avoid repeat disturbance. Protective Provisions alone protect assets; they don't deliver integration outcomes. AGR3 Lease Clause 3.19 already reserves LCJMF's cable-crossing/co-location right—this sits outside AGR's delivery and should be accommodated by the DCO.	chainage [X]; no ancillary infrastructure within LWS; no link boxes/joint bays in headlands. (2) Requirement – Interface & LWS Controls: no commencement of Little Hale Fen section until an Interface & Integration Plan is certified showing: (i) accommodation of Clause 3.19; (ii) concurrent delivery of the spare duct to boundary; (iii) agreed A17 access-sharing parameters with Triton Knoll OFTO (hours, caps, wheel-wash/escort); (iv) trenchless at all watercourse/ditch crossings; no haul/laydown in LWS4722. (3) Quantified Note (1 page): show integration benefits—HGV movements saved, working-width days avoided, re-open/stone tonnage avoided, LWS haul avoided. If declined, provide reasoned engineering/safety basis and propose an alternative safeguard of equivalent effect.
— 6.5 Provision of 33 kV duct to an LCJMF spur node —			
APP-285 (Grid Connection Statement); APP-278 (Design & Access)	*Applicant narrative (kept): no private-wire anticipated; separate 33 kV duct not assessed (technical/regulatory); no basis to install apparatus for LCJMF; LCJMF projects too early-stage; PPs/crossings could hinder or delay CNP delivery.*	**Not asking for supply or energised plant.** We seek programme-neutral safeguarding so the 400 kV corridor is not sterilised for proximate, policy-aligned demand (AGR3 consented; iDNO identified). EN-1 (2023) Part 4 (good design) and EN-5 coordination aims support passive future-proofing that avoids foreseeable second-pass disturbance	Rule 17 direction sought (inside red line; no CNP delay): Preferred – build-now/use-later: lay a passive (un-energised) 33 kV duct within the export working width from PV site to a capped spur node on LCJMF land (chainage [X]). Fallback – safeguard-only: (1) map a Reserved Strip (fixed width; objective clearances);

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
		(HGV/stone, LWS, soils/hydrology) without altering 400 kV design or route-to-market. Passive civils now ≠ commercial interlock.	(2) install HDD sleeves + draw-ropes now at all hard crossings (roads/PRoWs/drains/utilities) with pull-pits & as-builts; (3) grant a step-in option for LCJMF/its iDNO to install later on deemed consent after short notice (disputes → independent engineer limited to safety/engineering); (4) agree an indexed sterilisation head (PV/BESS) for easement + offset + halo plus indemnity-basis professional fees and reasonable management time; (5) include heat-loop crossing PPs so the closed-loop data-centre ↔ 60-acre glasshouse main can cross the 400 kV corridor without sterilisation. If Applicant maintains "no feasibility assessed", require a 2-page technical note (assumed separations, crossing details, and why passive provision would not delay CNP delivery).
— 6.6 Behind-the-meter opportunity —			
APP-285 (Grid Connection Statement); APP-278 (Design & Access)	*Applicant narrative (kept): BTm/private-wire to LCJMF "not part of the Proposed Development" and "not aligned with objectives"; cites EN-1 ¶4.3.22 (only consider alternatives that meet project objectives).*	This is a design safeguard, not an "alternative." LCJMF is not asking the Applicant to supply LCJMF or re-scope the NSIP. We seek programme-neutral future-proofing (passive 33 kV duct or safeguarded strip with HDD sleeves) so the corridor is not sterilised for lawful, later iDNO connection to proximate anchor load(s). EN-1 (2023) Part 4 (good design) and EN-5 on coordinated, efficient networks support measures that avoid foreseeable second-pass disturbance (HGV/stone,	Rule 17 direction sought (inside red line; no CNP delay): (i) Preferred – build-now/use-later: install a passive (un-energised) 33 kV duct within the export working width from PV site to a capped spur node on LCJMF land (chainage [X]). (ii) Fallback – safeguard-only: (a) map a Reserved Strip (fixed width; objective clearances); (b) install HDD sleeves + draw-ropes now at all hard crossings with pull-pits & as-builts; (c) grant a step-in option for a licensed iDNO on deemed-consent terms (disputes → independent engineer limited to safety/engineering).

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
		LWS, soils/hydrology) and make efficient use of existing corridors. Network charges (TNUoS/DUoS/BSUoS) can be 30–50% of delivered cost for large consumers; a safeguarded MV route enables BTm options without changing export arrangements. Passive civils now ≠ commercial interlock later.	If Applicant maintains "outside scope/ no feasibility," require a 2-page note confirming assumed separations, crossing details, and why passive provision would not delay CNP delivery.
— 6.7 Commercial optionality —			
APP-285 (Grid Connection Statement); APP-278 (Design & Access)	*Applicant says private-wire/BTM supply is not part of the Proposed Development and need not be considered under EN-1 ¶4.3.22.*	Optionality, not offtake. LCJMF does not seek to mandate supply or vary CfD/PPA positions. A passive 33 kV duct or safeguarded strip simply preserves lawful, later third-party connections (e.g., via iDNO) and avoids second-pass disturbance of the corridor. This aligns with EN-1 (2023) Part 4 (good design/efficient infrastructure) and EN-5 (co-ordination/future-proofing). For anchor loads, network charges (TNUoS/DUoS/BSUoS) can be 30–50% of delivered cost; safeguarding keeps that option alive without rescoping the NSIP.	Rule 17 – proportionate, programme-neutral design safeguard: (i) Preferred: install a passive (un-energised) 33 kV duct to a capped spur node on LCJMF land within the export working width; or (ii) Fallback: (a) map a Reserved Strip (fixed width; objective clearances); (b) pre-install HDD sleeves + draw-ropes at all hard crossings with pull-pits and as-builts; (c) provide a step-in option for a licensed iDNO on deemed-consent terms (disputes limited to safety/engineering). Require a 2-page note if the Applicant maintains "outside scope," confirming separation assumptions and why passive civils do not delay CNP delivery.
— 6.8 Failure to evidence the claimed "lack of headroom" —			
REP1-030 (Action Point 7); Planning Statement (Ref F)	*Applicant asserts all headroom within 600 MW import / 600 MW export is fully allocated to BESS and not*	REP1-030 (AP7) does not provide minimum artefacts to verify "no headroom" post-BFS (400 MW PV vs 600/600).	Rule 17 – targeted utilisation & safety note:

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
	available/novatable; no technical evidence supplied.	Missing: capacity-allocation schedule; load-flow/thermal limits (N-1/N-1-1) and margins; curtailment modelling basis; interface/protection constraints; and a statement on whether such constraints preclude passive civils safeguards. LCJMF is not seeking to alter export routes or contracts—only clarity and proportionate safeguarding.	(1) Utilisation table for the 600/600 arrangement (PV/BESS import–export envelopes; firmness/curtailment). (2) One-page load-flow summary (limiting elements, ratings, contingencies, residual margins). (3) Curtailment case summary (scenarios; annualised % for PV/BESS). (4) Safety/engineering confirmation whether constraints do / do not bar passive civils (Reserved Strip; HDD sleeves with pull-pits; capped spur / empty 33 kV duct). If refused, include the safeguard-only fallback in the DCO and provide reasons limited to safety/engineering (not commercial policy).
— 6.9 Directions sought (Integration) —			
REP1-030 (ISH1 AP7); ExQ1 (Doc 9.6, NED); APP-278 (Design & Access); APP-285 (Grid Connection Statement)	*Applicant says AP7/ExQ1 already explain 600/600 configuration; rejects being required to install "spur-ready nodes" or PPs for LCJMF; warns such measures could hinder CNP delivery.*	LCJMF is not asking for supply, contract changes, or any energised MV apparatus. We seek programme-neutral passive civils so the 400 kV corridor isn't sterilised: mapped space on LCJMF land, HDD sleeves + draw-ropes at hard crossings, and deposited as-builts. This fits EN-1 (2023) Part 4 (good design; efficient use; minimising future disturbance) and is within the red line, with no CNP delay.	Rule-17 directions (concise): 1) Headroom evidence — one-page utilisation note for post-BFS 600 MW import / 600 MW export (allocations PV/BESS, import/export envelopes, curtailment basis). 2) Options check (passive civils vs do-nothing) — one page comparing (i) do-nothing with (ii) light-touch safeguards: Reserved Strip (LCJMF land); HDD sleeves + draw-ropes + pull-pits at highways/IDB drains/PRoW/utilities within Order limits; as-builts (XY/ZZ/depth) lodged with LPA.

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
			3) Protective-provision wording — short draft mapping the Reserved Strip; preserving LCJMF/iDNO rights for later non-interfering civils; dispute to fast-track expert determination limited to safety/engineering. If any element is impracticable, give engineering/safety reasons (not commercial policy). 4) If a parallel 33 kV duct is declined now — confirm acceptance of the least-impact fallback (HDD sleeves + draw-ropes + pull-pits + Reserved Strip). If not accepted, state the engineering reason and propose an alternative passive safeguard that avoids future re-entry to the corridor/LWS.
— 7. Cable Route: Like-for-Like Comparison (Option 1 vs Option 3 vs LCJMF Aug-2023 hybrid) —			
REP1-029; APP-079	*7.1 LWS geometry (4722 vs 4490) — Option 1 runs longitudinally through LWS 4722 with CC4 adjacent; Applicant asserts alternatives add impacts.*	LCJMF hybrid mirrors Option 3: right-angle crossing of LWS 4490 (Old Forty Foot), avoids in-LWS haul through 4722; 1.19 km of in-LWS HGV activity exists under Option 1 (Ex35–38; Ex50–52).	Rule-17 table: For each option report (i) LWS length (m) & area (ha) within working width; (ii) count/type of LWS crossings; (iii) construction HGV days within LWS; (iv) HDD vs open-cut assumptions.
REP1-029 Appx 2; APP-079	*7.2 Hybrid alignment geometry (Car Dyke → Little Hale Drove) — LC says LCJMF route increases impacts/land interests without numbers.*	Hybrid = 732 m along Car Dyke + 233 m field link + 2,733 m along Little Hale Drove; avoids LWS 4722; crosses LWS 4490 at right angles; **reduces 3.2 km of E–W cross-block trenching (Ex11–12; Ex49–52).**	Ask: Provide trench length (m), haul-road length (m), HDD count, and cross-field metres avoided vs Option 1.

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
REP1-029; REP1-030 (AP6)	*7.3 PRoW & non-designated heritage — Applicant alleges additional interactions on LCJMF route but gives no counts/lengths/buffers.*	Verge-running on Little Hale Drove typically lowers PRoW severance vs cross-field cuts; require counts by option, not narrative.	Ask: For each option: (i) PRoW count & metre-length inside works; closure durations; (ii) non-designated heritage counts in 0–50 m and 50–100 m bands.
REP1-029 Appx 2	*7.4 Land interests (normalised) — Applicant cites more titles affected along LCJMF/Option 3.*	Title totals are not normalised for working width or verge vs arable. More highway-edge titles can still mean less productive land disturbed.	Ask: (i) Freeholder count within necessary working width; (ii) arable hectares subject to trenching/reinstatement, by option.
APP-079; APP-060	*7.5 Construction metrics missing — ES lacks a consolidated numbers table to compare options.*	Decision needs a single, numbers-first matrix spanning environment & logistics.	Ask: One-page matrix per option showing: trench length; HDD count; haul-road length; LWS length/area; PRoW metrics; heritage bands; HGV days in LWS 4722; indicative stone tonnage.
APP-278 (Design & Access)	*Policy fit (EN-1 2023, Part 4) — Applicant suggests EN-1 refs are obsolete.*	LCJMF relies on EN-1 (2023) Part 4 (good design: efficient layouts; minimise adverse effects) — not the 2011 numbering.	Ask: Applicant to cite the EN-1 (2023) principles actually applied in preferring Option 1 over right-angle alternatives and provide the comparative metrics relied upon.
— 7.3 Integration with offered parcels (collection corridor) —			
REP1-029; APP-079 (Cable Route Corridor Appraisal); APP-285 (Grid Connection Statement); APP-278 (Design & Access)	*Applicant says "responded above"; no side-by-side numbers; asserts hybrid would add impacts/land interests without quantified comparison.*	LCJMF Aug-2023 hybrid is a collection spine that picks up 418 ac (Great Hale) + 200 ac (Little Hale) = 618 ac (predominantly ALC 3a/3b) on the way to the PoC (Ex6; Ex8–Ex9; Ex16–Ex18; Ex49–Ex52). Supports EN-1 (2023) good-design & network-efficiency by integrating proximate parcels now and avoiding future re-entry to the 400 kV corridor.	Rule-17: one-page matrix (Option 1 "as-is" vs Hybrid "collection corridor") — 1) Trench/Haul: total trench length (m); HDD count; haul-road length (m). 2) Environment: LWS length (m)/area (ha) in working width; LWS crossing count/type; PRoW metres within works & closure days; non-designated heritage counts in 0–50 m & 50–100 m bands.

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
			3) Soils/Farm impact: arable hectares disturbed; field breaks/headlands crossed (count). 4) Operational/future-proofing: Yes/No—would later PV/BESS connections require reopening the 400 kV corridor under each option? If hybrid shows shorter cable, fewer sensitive interactions, less arable disturbance and no re-entry, record reasons for preferring Option 1 **or adopt the hybrid spine**. Program-neutral.
— 7.4 Prior rights and engineering feasibility (crossings / spurs) —			
APP-079; REP1-029; REP1-030; Ex44 (AGR3 Lease Cl.3.19 / 10.3); Ex11	*Applicant relies on dispersed ES narrative; no acknowledgement of LCJMF's reserved cable-crossing/co-location right or quantified PRoW effects on Little Hale Drove.*	Prior right exists and was notified Nov-2021. AGR3 Lease Cl.3.19 reserves LCJMF's crossing/spur along Little Hale Drove (governed by Cl.10.3). This demonstrates the hybrid route is technically/legally feasible, not merely preferable on geometry. LCJMF hybrid interacts with PRoW for 267 m parallel/adjacent alignment with one crossing (Ex11). Consistent with EN-1 (2023) Part 4 early integration.	Rule-17: (1) Acknowledge and accommodate Cl.3.19 in certified Design Principles/Requirement so LCJMF's crossing/spur can be exercised without re-opening the corridor; (2) require an Interface & Integration Plan (Little Hale Drove) confirming method (incl. HDD where needed), PRoW management and spur geometry within Order limits; (3) include the PRoW metrics above in the cable-route comparison. Programme-neutral.
— 7.5 Direction sought (Cable Route) —			
APP-079; REP1-029 (Appx 2 plans); REP1-030	*Applicant says "already covered in ES"; no side-by-side, like-for-like comparison is provided.*	Material is dispersed across volumes; the ExA cannot see deltas for Option 1 / Option 3 / LCJMF Aug-2023 hybrid on the same metrics. EN-1 (2023) 4.3.22–	Rule-17 — Cable Route Like-for-Like Matrix (1–2 pp): For each option tabulate with sources/assumptions:

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
		4.3.23 supports a short proportionate consolidation using existing data only.	Ecology (LWS length/area within working width; right-angle vs longitudinal); PRoW (count; closure duration; diversion lengths); Heritage (stand-offs; HDD feasibility/lengths); Watercourses (count; HDD/open-cut; geometry); Utilities (constraints/working-width); ALC/Flood Zone (by chainage: FZ1/2/3; BMV vs 3a/3b); Trenching/Haul (total metres; E–W vs N–S split; HDD count; haul-road length); Compounds/AIL (number/size/location; AIL route mileage/access); Operational access (land-interest count; peak & total construction traffic aligned with primary/secondary access). Comparative, sourced, programme-neutral; no new surveys.
— 8. Summary of Requests to the Examining Authority (ExA) —	*Applicant says LCJMF's requests are disproportionate/not required by EN-1 4.3.22–4.3.23; suggests HoTs engagement instead.*	Requests are short, source-bounded consolidations from existing ES/library (APP-054, APP-079, REP1-029/030, Doc 9.1) to close targeted evidential gaps; proportionate under EN-1 (2023) Part 4 (good design) & 4.3.22–4.3.23. Private HoTs cannot replace an evidence-based record.	Rule-17 directions sought (targeted): R17-A Alternatives (like-for-like) — 1–2pp matrix comparing Option 1 / Option 3 / LCJMF Nov-2021 & Aug-2023 (hybrid) within 10 km screen and post-BFS 600/600 configuration; show LWS/PRoW/heritage/watercourses/utilities/ALC-FZ/trenching/compounds-AIL/operational access (source each cell). R17-B Weight of sieves — confirm ≥300 ha & contiguity are not policy tests; limited weight (APP-054 Appx 2). R17-C Flood & BESS parity — FZ (NaFRA2-2025) and ALC/BMV tables for Applicant BESS vs LCJMF FZ1 BESS at Little Hale Fen. R17-D LWS & repeat-corridor cumulatives — quantify LWS 4722

Applicant D2 doc (EL ID)	Issue	LCJMF comment	Consequence / Ask
			length/area in working width; Viking Link repeat-use HGV passes, stone tonnage, reinstatement, soils/hydrology indicators. R17-E Baseline reconciliation (precaution) — reconcile ES ecology with RHE evidence; specify any seasonally-appropriate re-survey. R17-F Network utilisation & safeguards — short post-BFS 600/600 utilisation note (allocation table; limiting element; curtailment basis) and confirm whether passive spur safeguards (reserved strip; HDD sleeves & draw-ropes; or single empty 33 kV duct to capped chamber on LCJMF land) are acceptable on engineering/safety grounds; if not, give reasons and propose an acceptable passive alternative. All are programme-neutral and draw only on existing material.
— 9. Conclusion —	*Applicant says requests "would not assist the proper examination."*	LCJMF supports Beacon Fen; seeks like-for-like testing of LCJMF 2021/2023 offers; accurate cumulatives (NaFRA2, Viking Link repeat-use); formative consultation clarity; and future-proofed integration (spur-ready node/33 kV duct/heat-main crossing) consistent with EN-1/EN-5 and EIA Regs.	**Ask to ExA: adopt R17-A → R17-F above to move record from assertion to evidence; enable a transparent, proportionate determination of whether the chosen route/siting remains most appropriate given post-BFS 600/600, updated flood baseline, and documented LCJMF alternatives. LCJMF will continue HoTs engagement in parallel.**

3. Requested actions (Rule 17 directions)

Proportionality & scope.
Each request below is short, programme-neutral and draws only on material already in the Examination Library (e.g., APP-054, APP-079, APP-277/285, AS-022, Doc 9.1) and previously filed exhibits. Outputs are 1–2 page tables/notes to enable a like-for-like comparison under EN-1 (2023) Part 4 (good design), §§4.3.22–4.3.29 (proportionate alternatives), and topic policies on flood risk and agricultural land.

- R17-1 — Alternatives matrix (post-BFS, like-for-like).
  1–2 page table comparing: (i) Applicant's chosen scheme; (ii) Option 3; (iii) LCJMF Aug-2023 hybrid; (iv) LCJMF Nov-2021 partial PV/BESS, with quantified metrics (LWS, PRoW, heritage, HDD, trench/haul, ALC/FZ, logistics).

- R17-2 — BESS siting: Sequential-Test parity table (NaFRA2 baseline).
  One page comparing chosen BESS vs LCJMF FZ1 BESS parcel (+ proximate ALC 3a/3b PV ~2.7 km to PoC).

- R17-3 — ALC/BMV parity table.
  One page using field-scale evidence already on record (SES 2021; LRA 2024; Viking Link pre/post) comparing chosen parcels vs LCJMF 3a/3b parcels for the partial PV/BESS alternative.

- R17-4 — Cable route comparison (Option 1 vs Option 3 vs LCJMF hybrid).
  1–2 page numbers table for the Little Hale/Great Hale section (trench/haul/HDD; LWS 4722/4490 metrics; PRoW and heritage counts; arable hectares disturbed; headlands crossed).

- R17-5 — Repeat-corridor cumulatives (Viking Link re-use).
  One-page addendum quantifying repeat-use effects for CC4/CC5 vs a non-re-use option (HGVs; stone; soils/hydrology; LWS exposure) against Viking Link as-built baselines.

- R17-6 — Headroom & utilisation note (post-BFS 600/600 with 400 MW PV).
  Plain-English, 1 page + small table: allocations; limiting element & rating; residual margins; and whether constraints do / do not preclude passive civils safeguards on engineering/safety grounds only.

- R17-7 — Integration & future-proofing on LCJMF land (design principles).
  Confirm adoption of the passive safeguard package or provide engineering/safety reasons and an equivalent alternative. *(See Annex A.)*

- R17-8 — Prior rights & feasibility acknowledgment (AGR3 Lease Cl. 3.19 / 10.3).
  Short Interface & Integration Plan for Little Hale Drove (recognise reserved crossing/spur right; method incl. HDD; PRoW management; safeguarded spur geometry within Order limits).

- R17-9 — Environmental baselines reconciliation (precaution).
  One page reconciling ES ecological baselines with RHE evidence (when filed); identify any seasonally appropriate re-survey; state how uncertainty is handled.

- R17-10 — Soils & farm operations comparison (repeat-use vs avoid).
  One page comparing options on HGV/stone; soil metrics; reinstatement passes; hydrology indicators; and, if Option 1 is retained, list strengthened CEMP/Soil Plan controls.

- R17-11 — Consultation adequacy addendum (formative testing of LCJMF offers).
  1–2 pages: timeline; like-for-like testing (or none) for Nov-2021 and Aug-2023 offers; reasons; consolidated timeline (AS-095; Ex62–Ex63).

- R17-12 — Sieves clarification (weight, not thresholds).
  Short note confirming ≥300 ha and contiguity were internal screens (not policy tests) and setting how smaller proximate parcels (≤2.7 km) are appraised like-for-like.

Implementation note.
These are clerical consolidations and passive design safeguards. They do not re-scope the CNP NSIP or affect programme; they simply enable decision-grade evidence on alternatives, cumulatives, flood/ALC parity, integration, and prior-rights feasibility.

Capitalised terms used in Annex A/B/C have the meanings set out in this Glossary unless otherwise defined.

Annex A — Protective Provisions (LCJMF)

A1. Definitions

- "Reserved Strip": the safeguarded strip for a future 33 kV spur, as shown on Plan [X], min. width [x] m.
- "Spur Node": capped chamber at chainage [X] on LCJMF land, for future MV connection.
- "Hard Crossings": public highway, Internal Drainage Board drains/watercourses, PRoWs, and third-party utilities intersected by the Reserved Strip.

A2. Spur node & passive civils (preferred)
The Undertaker shall, within the Little Hale Fen construction window:
(a) install one passive (un-energised) 33 kV duct laid within the export corridor working width across LCJMF land to a capped Spur Node at chainage [X];
(b) provide as-built records (XY/ZZ/depth; chamber details) to LCJMF and the LPA prior to demobilisation;
(c) grant enduring rights for access/maintenance/works within the Spur Node for lawful third-party use, without prejudice to safety/operational requirements.

A3. Safeguarded fallback (if A2 declined)
The Undertaker shall:
(a) reserve the Reserved Strip on LCJMF land (Plan [X]) kept free to an objective clearance standard;
(b) install HDD sleeves with draw-ropes at all Hard Crossings now, with pull-pits just outside each crossing and deposit as-builts (XY/ZZ/depth);
(c) grant LCJMF or its nominated licensed iDNO an option/step-in to install a 33 kV spur within the Reserved Strip on deemed consent following 30 days' notice; any objection to be determined by an independent engineer, limited to safety/engineering feasibility.

A4. Heat-main crossing protection
Secure alignment window, clearances, trenchless method preference and as-built deliverables for the closed-loop heat main (data centre ↔ 60-acre glasshouse) crossing the corridor on LCJMF land. No link boxes/joint bays in headlands.

A5. Repeat-corridor safeguards (Viking Link re-use)
If the corridor overlaps the Viking Link alignment: no longitudinal haul within LWS 4722; right-angle crossings only; seasonal soil-moisture windows; granular import limits; independent as-left soil testing and hydrology monitoring.

A6. Costs & indemnities
The Undertaker shall reimburse LCJMF's reasonable professional fees (legal/land agent/engineering) on an indemnity basis and reasonable management time properly incurred to agree and implement A2/A3/A4.

A7. Non-sterilisation statement

Nothing in these provisions prevents lawful later installation of MV apparatus on LCJMF land in accordance with A2/A3; sterilisation is addressed separately under Annex B.

Annex B — Sterilisation Valuation Schedule (corridor strip & halos across LCJMF land)

B1. Corridor geometry (fixed on as-built re-measurement)

Item	Value
Corridor length (LCJMF)	3.2 km
Sterilised width	22 m (12 m easement + 5 m operational offset each side)
Area	70,400 m² ≈ 7.04 ha ≈ 17.4 acres
Indexation	CPIH (0% floor)
Fixing	As-built re-measurement

B2. PV sterilisation (annual)

Distance to PoC (Bicker Fen)	Rate	Area	Annual amount
≤ 4 km	£****/acre/yr	17.4 ac	£**,***/yr
4–7 km	£****/acre/yr	17.4 ac	£**,****/yr

If the PV-capable subset differs on as-built measurement, apply the same banded rate to the PV-capable acreage.

B3. BESS sterilisation (annual; pro-rata "blocked MW")

Distance to PoC (Bicker Fen)	Rate	Blocked MW	Annual amount
≤ 4 km	£*,****/MW/yr	*as fixed on as-built*	£*,*** × MW
4–7 km	£*,****/MW/yr	*as fixed on as-built*	£*,*** × MW

"Blocked MW" to be derived from permanent compounds/halos/offsets that foreclose realistic BESS hosting capacity; methodology to be agreed. If annuals are not agreed, capitalise via an agreed NPV factor.

B4. Compounds / halos / access

Add joint bays, link boxes, permanent access or compounds within/abutting LCJMF land to the sterilised figure and pay at the same PV (area) / BESS (pro-rata MW) proxy rates, fixed on as-built.

B5. Repeat-corridor disturbance premium

Apply +25% to the sterilisation total where re-occupation commences within five growing seasons of Viking Link demobilisation (or until independent verification confirms recovery). Failing agreement, determine via expert

determination (RICS President default), with metrics including HGV movements, imported stone, bulk density change and recovery period.

B6. Professional fees & management time

Reimburse legal, land agent, engineering costs on an indemnity basis plus reasonable management time properly incurred.

Annex C — LWS 4722 Construction Safeguards

C1. Alignment & crossings

- Avoid longitudinal occupation of LWS 4722; apply right-angle crossings only.
- Relocate CC4/any compound outside LWS buffers; no haul/laydown within LWS.

C2. Methods & controls

- Trenchless at watercourse/ditch/IDB crossings within or adjacent to LWS; no open-cut within LWS.
- Seasonal working respecting soil-moisture windows; cap granular imports; specify haul-road materials.
- Ecologist-led watching brief; define exclusion zones; toolbox talks; incident stop-work protocol.

C3. Verification & reinstatement

- Pre-/post-works soil testing (bulk density/penetrometer) and hydrology indicators (ponding extent/duration) at LWS and controls; publish a short as-left verification note.
- Success criteria for vegetation recovery; remedial triggers; re-inspection windows.

C4. Information deliverables

- Deposit as-built records (XY/ZZ/depth, HDD sleeve locations with draw-ropes, pull-pits) with LPA and LCJMF prior to demobilisation.
- File a LWS-specific CEMP/CTMP appendix setting out the above controls.

Closing statement

LCJMF supports delivery of Beacon Fen. The short, sourced matrices and passive safeguards sought will move the record from assertion to decision-grade evidence without delaying a CNP scheme: proportionate under EN-1 (2023) Part 4 and consistent with EN-5 co-ordination and efficient network use. LCJMF will continue HoTs engagement in parallel.

Directions invited: adopt R17-1 → R17-12 above and secure the Protective Provisions (Annex A), Sterilisation Schedule (Annex B), and LWS safeguards (Annex C).

Glossary

AIL — Abnormal Indivisible Load (e.g., transformer moves requiring escorts/traffic management).

ALC — Agricultural Land Classification (Grades 1–5); **BMV** means Best & Most Versatile (Grades 1, 2, and 3a).

APP-0xx / REPx-xxx / AS-0xx / Doc 9.x — Examination Library IDs (Application documents, Representations, Additional Submissions, and Exam documents).

BESS — Battery Energy Storage System.

BFS — British Energy Security Strategy–related "Bloomfield Framework Statement" reforms (used here as the Applicant's "post-BFS configuration" shorthand: 600 MW import / 600 MW export, 400 MW PV, 600 MW BESS).

BoR — Book of Reference (DCO schedule identifying land interests).

CEMP — Construction Environmental Management Plan (contractor-facing environmental controls).

CC4 / CC5 — Construction Compound 4 / 5 (as labelled on Applicant's works plans).

CTMP — Construction Traffic Management Plan (traffic routing, HGV caps, TM measures).

DCO — Development Consent Order (NSIP consent under the Planning Act 2008).

EN-1 / EN-3 / EN-5 — National Policy Statements: Overarching Energy (EN-1), Renewable Energy Infrastructure (EN-3), Electricity Networks (EN-5).

EIA Regs — Infrastructure Planning (EIA) Regulations 2017 (as amended).

ExA — Examining Authority (appointed by the Planning Inspectorate).

FZ1 / FZ2 / FZ3 — Flood Zones (1 = lowest probability; 3 = highest, fluvial/tidal).

HDD — Horizontal Directional Drilling (trenchless crossing method).

Headroom — Unutilised import/export capacity within the 600/600 MW connection envelope, after accounting for PV/BESS operational use.

HGV — Heavy Goods Vehicle.

iDNO — Independent Distribution Network Operator (licensed 11–33 kV networks).

LIR — Local Impact Report (submitted by local authorities).

LPA — Local Planning Authority.

LWS — Local Wildlife Site (non-statutory ecological designation).

NaFRA2 — National Flood Risk Assessment (2025 refresh used for surface-water/flood mapping baseline).

NGET / NESO / Ofgem — National Grid Electricity Transmission / National Energy System Operator / Office of Gas and Electricity Markets (regulator).

NSIP — Nationally Significant Infrastructure Project.

OFTO — Offshore Transmission Owner (e.g., Triton Knoll onshore substation network owner).

PEIR — Preliminary Environmental Information Report (statutory consultation stage).

PoC — Point of Connection (here: Bicker Fen 400 kV node).

PPs (Protective Provisions) — DCO drafting to protect third-party assets/rights; here also used to secure passive future-proofing measures.

PRoW — Public Right of Way.

RAG — Red/Amber/Green (comparative scoring).

Rule 17 — Examination Procedure Rules 2010, Rule 17 (ExA can request further information).

Sequential Test / Exception Test — Flood-risk policy tests (locate in lowest reasonable flood risk; justify higher-risk development only where necessary and safe).

SoCG — Statement of Common Ground.

SoR — Statement of Reasons (Applicant's compulsory acquisition justification).

Spur Node — Mapped, capped chamber on LCJMF land for a future 33 kV tie-in.

Reserved Strip — Safeguarded narrow corridor for later MV cable installation (with HDD sleeves at hard crossings).

Halo Areas — Mapped polygons (e.g., around joint bays/link boxes/access pads) that create permanent PV/BESS sterilisation beyond the linear easement.

VL / Viking Link — 1.4 GW HVDC UK–Denmark interconnector; its on-farm as-left corridor is part of the cumulative baseline.

End of document.