**Beacon Fen Energy Park – Development Consent Order**
Application reference: EN010151
Submitted by: LCJ Mountain Farms Ltd (Interested Party Ref: F8D0BCE95)
On behalf of: LCJ Mountain Farms Ltd and, if permitted, Leslie Christopher John Mountain and Patricia Lynne Mountain (F5A76C031)
Document: Deadline 4 – Matrix Comparator Clarification (LCJMF Hybrid) and Targeted Rule 17 Request (CAH1 follow-up)
Deadline: Deadline 4 (D4) – 21 November 2025
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**Matrix Comparator Clarification (LCJMF Hybrid) — D4 Submission**

**Purpose**

To fix—beyond doubt—the single LCJ Mountain Farms Ltd ("LCJMF") comparator for the Applicant's like-for-like matrix requested after CAH1, and to explain why the matrix is a proportionate exercise using only evidence already before the Examination.

**Comparator definition (clarified)**

"LCJMF Hybrid" means the alignment shown **as the yellow dotted line in REP2-051, p.15 (ExD2.11), fixed 581 m east of Car Dyke and wholly on LCJMF titles**.

LCJMF relies on that alignment as its single comparator for any like-for-like assessment. This clarification introduces no new corridor and does not change the application; it simply fixes the LCJMF comparator already on the record.

Requested Direction: LCJMF invites the ExA to direct that the Applicant's comparative matrix must use the ExD2.11 yellow dotted line (REP2-051, p.15) as the LCJMF comparator—not any Car-Dyke-aligned or other substitute variant.

**Diagram 1**

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


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**Deliverability boundary (tenure constraint)**

LCJMF is only a tenant of the area edged blue/filled bright green (Diagram 2) and cannot grant north–south passage through that area [solid yellow line].

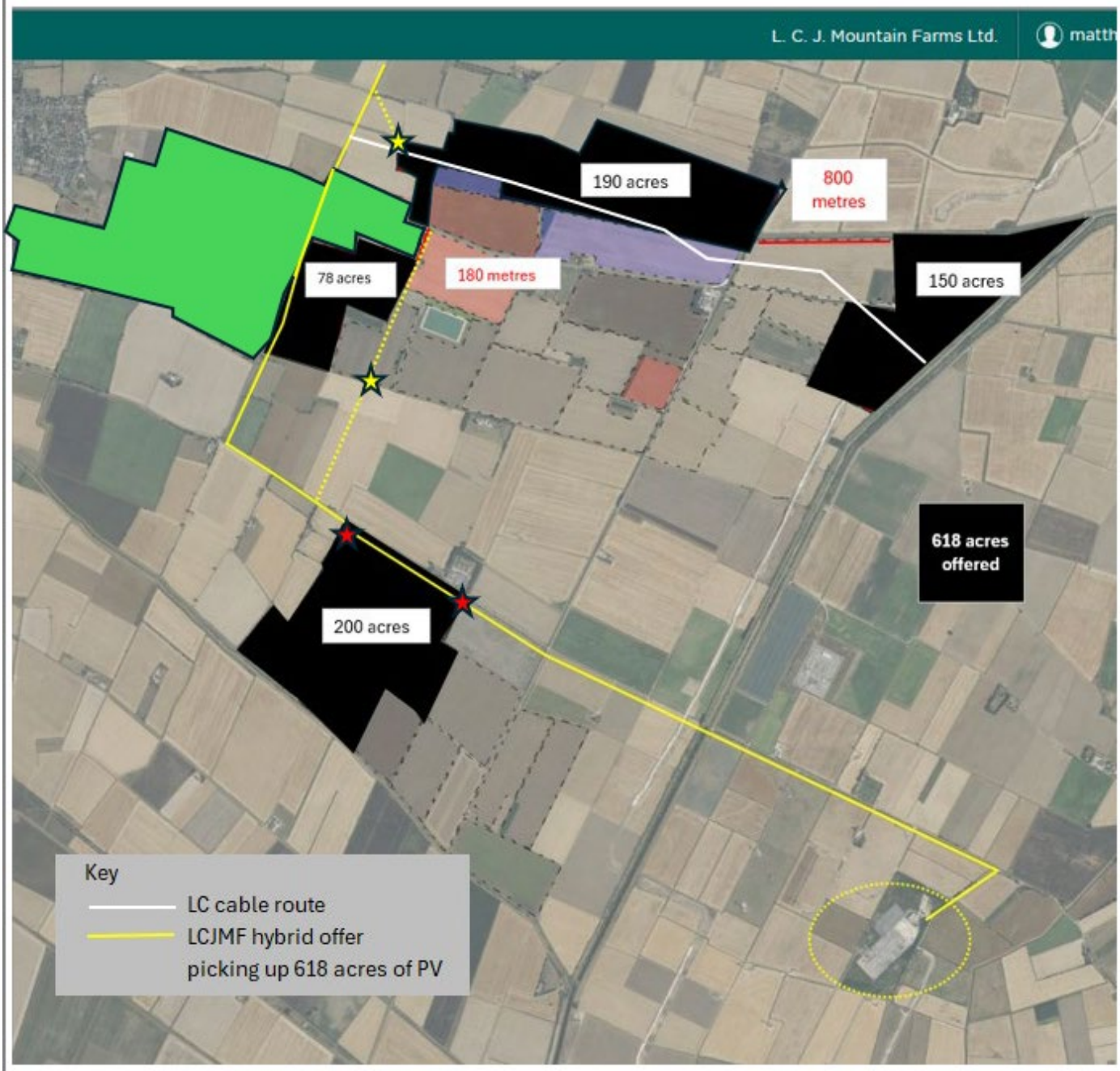
**Diagram 2**

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


LCJMF can grant passage along the ExD2.11 yellow dotted line between the yellow stars in Great Hale Fen (1,500 m) and the red stars in Little Hale Fen (750 m)—2,250 m total (Diagram 3).

**Diagram 3**

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

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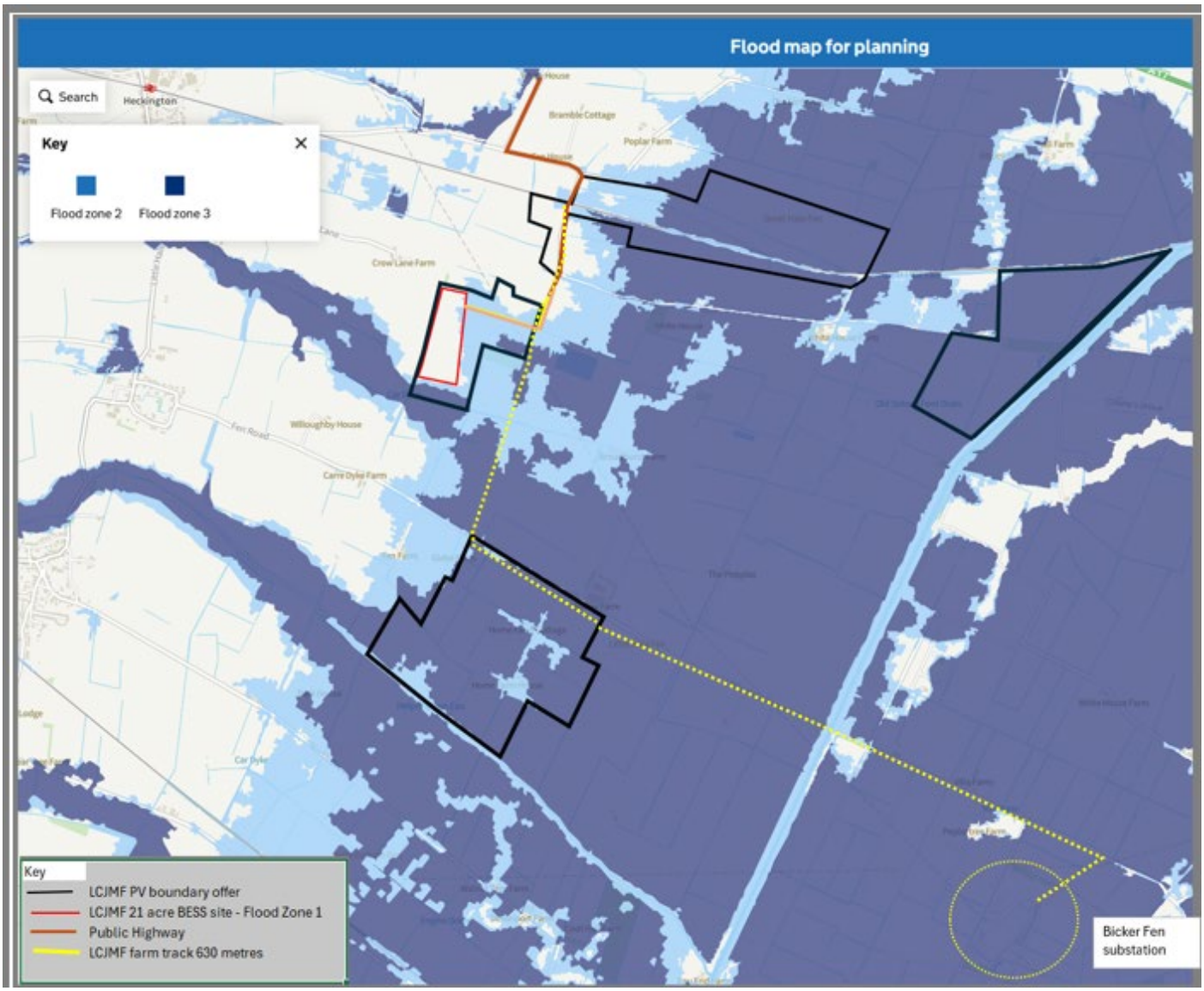
**Why the ExD2.11 yellow dotted line is the proportionate test**

- **Consistency with Applicant evidence** (ISH1, EV2-006): The Applicant accepted that continuity improves deliverability/viability and that fragmentation harms it. The ExD2.11 yellow dotted line increases continuity across LCJMF's block (including the 618 acres offered to the project) and reduces fragmentation vs Option 1.
- **Environmental interaction**: Option 1 entails 1.19 km of longitudinal works adjacent to LWS 4722, plus a haul route serving CC4. The ExD2.11 yellow dotted line avoids longitudinal occupation of LWS 4722 and maintains larger stand-offs from LWS 4489 (Mill Drain) and LWS 4520 (Willow Farm Drain).

- **Grid headroom & land-use logic:** The ExD2.11 yellow dotted line captures the 618 acres in LCJMF's Aug-2023 solar offer (198 MW at 0.32 MW/ac), aligning with the Applicant's stated 200MW BESS headroom for "other uses" [additional / sequential generation] discussed under ISH2, Agenda 3 with the BESS sited on 21 acres in Flood Zone 1 [red block below – Diagram 4].

**Diagram 4**




- **Construction feasibility:** Robust farm access (brown routes on Diagram 4); 3–5 km from PoC; Grade 3 land per LCJMF 30-year cropping records and the AGR3 ALC outcome (Rep1-043).

**Targeted Rule 17 (programme claim)**

The Applicant has asserted the LCJMF alternative "would not have achieved the connection-date element" but has provided no critical path, construction sequence, or grid programme.

Requested Direction: a targeted Rule 17 requiring disclosure of (i) programme/critical path and (ii) a like-for-like comparison of the adopted configuration with LCJMF's Aug-2023 Offer + ExD2.11 yellow dotted line.

**Proportionate one-page “Core-12” matrix**

LCJMF embeds below a Core-12 to structure a three-column comparison:

(1) Option 1 (adopted); and noting the AGR3 cable crossing agreement in place [NSIP carve out] (2) LCJMF Hybrid — road verge (ExD2.11 yellow dotted line); (3) LCJMF Hybrid — field-edge (ExD2.11 yellow dotted line).

Rows are objective, map-based metrics (lengths, angles, buffers, counts) obtainable from the Applicant’s GIS/ES and Book of Reference. No new surveys are sought, save for targeted ALC limited to LCJMF sections if the Applicant disputes LCJMF’s Grade-3 evidence (LCJMF will grant immediate access).

| Row | Method | Option 1 (adopted) | LCJM Hybrid - road verge | LCJM Hybrid - field margin |
|---|---|---|---|---|
| 1 | PoC distance & total trench (km) — GIS centreline (0.1 m precision), scheme-wide trench length per comparator. Add one-line logistics note (compound count; abnormal loads; highway interfaces). | | | |
| 2 | Private-land trench split (km) — total trench length across private land, split LCJMF vs non-LCJMF. | | | |
| 3 | Field fragmentation on LCJMF (count) — number of E–W field breaks (cable >60° to boundary). Note if any field becomes impracticable for large-scale layouts. | | | |
| 4 | Flood zone footprint on LCJMF (ha) — temporary vs permanent areas within Flood Zones 1, 2 and 3. | | | |
| 5 | ALC / BMV on LCJMF (ha) — temporary and permanent areas on LCJMF land by Grades 1 / 2 / 3a (BMV) vs 3b / 4 / 5 (non-BMV), with hectares also reported by individual grade (1, 2, 3a, 3b, 4, 5). State data source for each comparator (national desktop vs site-specific ALC). For the LCJMF Hybrid, the baseline position is LCJMF's farm-specific evidence (AGR3 site survey: c.96% Grade 3a on c.200 acres in the corridor; 30-year cropping records), unless superseded by any targeted field ALC on LCJMF sections only (LCJMF grants access). | | | |
| 6a | LWS longitudinal works (m) — combined length of cable trench and any construction access / haul route within 30 m of the bank-top of each Local Wildlife Site (LWS) for 25 m or more, reported separately for: (i) trench; and (ii) access / haul. For LWS 4722, also report the maximum continuous longitudinal section (m). | | | |
| 6b | LWS perpendicular crossings (count & method) — for LWS 4722, 4490, 4489 and 4520: number of crossings, split by method (open-cut / HDD / bridge or culvert replacement). State explicitly where HDD is and is not proposed (cf. Viking Link HDD under LWS 4722). | | | |
| 6c | LWS minimum stand-offs (m) — minimum bank-top stand-off for any trench or access / haul; list all sub-30 m departures, giving both distance (m) and length of affected section (m). | | | |
| 7a | Access / haul near LWS — any haul route, compound or construction access within 50 m of any LWS (Yes / No). If Yes: (i) total length within 50 m (m); (ii) longest continuous section (m) running broadly parallel to the LWS; and (iii) closest distance (m). | | | |
| 7b | Construction compounds near LWS — any construction compound or main laydown area within 100 m of any LWS (Yes / No). If Yes: report, for each compound: (i) LWS reference; (ii) stand-off distance from bank-top to closest compound edge (m); (iii) compound footprint (ha); and, where available, (iv) predominant use (e.g. welfare, laydown, plant) and duration of use (months). | | | |
| 7c | Construction compounds within 100 m of former Viking Link compound — any Beacon Fen construction compound or main laydown area located within 100 m of the reinstated Viking Link compound footprint on LCJMF land (Yes / No). If Yes: report, for each such compound: (i) field / parcel name (e.g. Starvalls TF 1941 4286); (ii) stand-off distance from the edge of the former Viking Link compound (m); (iii) compound footprint (ha); (iv) whether Beacon Fen proposes to re-use existing Viking Link access tracks or create additional access routes. | | | |
| 8a | Affected parties (LCJMF → PoC): Beneficial freehold owners (count) — count each beneficial freehold owner once, irrespective of number of titles; no title-counting. | | | |
| 8b | Affected parties (LCJMF → PoC): Total affected interests (count) — total Category 1–3 interests between LCJMF and the point of connection: beneficial freehold owners; tenants / occupiers; options / conditional contracts; wayleaves / easements; restrictive covenant beneficiaries; statutory undertakers / IDB; public rights of way / highways authorities. | | | |
| 8c | Affected parties (LCJMF → PoC): % of route within LCJMF control — percentage of total route length between LCJMF and the point of connection that lies on LCJMF land (or land under LCJMF control), as opposed to third-party private land or public highway. | | | |

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|---|---|---|---|---|
| 9a | Operational width on LCJMF (evidence-led): Minimum evidenced operational width (m) — minimum operational corridor width on LCJMF land supported by manufacturer or transmission-operator citation (evidence reference to be given). | | | |
| 9b | Operational width on LCJMF (evidence-led): Permanent width sought (m) & permanent area (ha); TP area (ha) — permanent width and area sought on LCJMF land, plus temporary works area. | | | |
| 9c | Operational width on LCJMF (evidence-led): Co-existence feasibility — whether there is physical space within the secured operational corridor for a single parallel private-wire duct (Yes / No). If No, specify the constraint with citation (e.g. electrical clearance, safety code, manufacturer requirement). | | | |
| 10 | Agricultural operations continuity (LCJMF) — on LCJMF land: rotation blocks severed (count); headland / turning-area loss ($m^2$); internal gates and tracks severed (count) and relocations required. | | | |
| 11 | Drainage interactions (LCJMF) — on LCJMF land: laterals intercepted (count and / or count per hectare cut); carriers / main drains crossed (count and crossing angle); reinstatement specification citation; whether pre- and post-works CCTV or dye-testing is proposed (Yes / No). Note any section where works run longitudinally within 30 m of a carrier or IDB drain for 100 m or more. | | | |
| 12 | Cumulative with Viking Link (LCJMF block) — for LCJMF land already crossed by Viking Link: (i) length of any cable trench or construction access route within 100 m of the Viking Link alignment (m), split into parallel sections (more than 100 m broadly aligned) and approach sections; (ii) number of crossings of the Viking Link corridor and crossing-angle bands (<30°, 30–60°, >60°); (iii) minimum separation distance (m); and (iv) overlap / adjacent stand-off area (ha). | | | |

Note: LCJMF Hybrid route is the alignment that directly collects the 618 acres offered in Aug-2023 as a single continuous block on Grade 3 land adjacent to PoC

**ALC/BMV discipline**

As set out in LCJMF's ISH3 Land Use oral submission, the Applicant's desktop ALC mapping (15% Grade 1, 79.6% Grade 2, 5% Grade 3) does not reflect farm-specific evidence at this end of the scheme. The AGR3 site-specific ALC survey on LCJMF land (c.200 acres; 75 pits) records approximately 96% Grade 3a, in an area the desktop mapping presents as predominantly Grade 1/2. That survey and 30 years of cropping records underpin the LCJMF Hybrid alignment, which was placed deliberately onto Grade 3 land.

For the purposes of the like-for-like matrix, LCJMF therefore invites the ExA to treat:

• the LCJMF Hybrid route as running predominantly on Grade 3 (non-BMV) land on LCJMF's holding; and

• any further detailed ALC work, if you consider it necessary, as being targeted only on LCJMF's sections of the corridor.

The Core-12 Row 5 is drafted on that basis, requiring the Applicant to report, for each comparator, hectares by grade (1 / 2 / 3a / 3b / 4 / 5) and to identify whether they rely on desktop mapping or site-specific ALC. That allows the ExA to see transparently how Option 1 and the LCJMF Hybrid respectively interact with BMV vs non-BMV land at this end of the scheme.

**Short ecological clarification**

The Applicant's "on top of vs adjacent to" framing for LWS 4722 is artificial: kilometre-scale longitudinal working adjacent to a riparian LWS can be as—or more—disturbing than a perpendicular crossing. We also understand HDD is proposed only for the South Forty Foot, not for LWS 4722 (while Viking Link HDD'd LWS 4722). **Requested Evidence:** why HDD under LWS 4722 is "not necessary" here (method statement/constraints).

**Ownership counting discipline**

Prior "17 or 18 vs 12 freeholders" figures were title counts. For the matrix, please report:
(i) distinct beneficial freehold owners, and (ii) total Category 1–3 interests (owners; tenants/occupiers; options/conditional contracts; easements/wayleaves; RC beneficiaries; statutory undertakers/IDB; PRoW/highways). Please note the end of Little Hale Drove is a dead end at the South Forty Foot and therefore corresponding no / low traffic.

**ALC/BMV (proportionate handling)**

The material route difference lies almost entirely on LCJMF land. The ExD2.11 yellow dotted line was placed onto Grade 3a/3b areas (consistent with AGR3 ALC). The ExA may either: (i) accept LCJMF's evidence (30-yr cropping + AGR3 ALC), or (ii) require targeted field ALC on LCJMF sections only.

**Drainage reality (for matrix row “Drainage interactions”)**

In Great Hale Fen, north–south field drains are typically at 21-yard spacing. A 3.2 km west–east strip (Option 1) therefore intercepts a maximum off 166 laterals across LCJMF, with associated severance/reinstatement risk. The ExD2.11 yellow dotted line (north–south section) avoids that systemic west / east drain-cutting pattern.

**Conclusion**

LCJMF supports the project. We have twice offered significant land to assist delivery and, following CAH1, we have responded to the voluntary offer. A voluntary, least-rights agreement remains possible; compulsory powers need not be exercised over LCJMF plots. The Core-12 matrix is a proportionate, transparent means for the ExA to test necessity, least-rights, and environmental effects on our plots using information already in the Examination.