Beacon Fen Energy Park – Development Consent Order
Application Reference: **EN010151**
Submitted by: L.C.J. Mountain Farms Ltd ("LCJM") (Interested Party Reference: **F8D0BCE95**)
On behalf of: L.C.J. Mountain Farms Ltd and, where permitted, Leslie Christopher John Mountain and Patricia Lynne Mountain (Interested Party Reference: F5A76C031)

Document: Deadline 8 – Closing Summary Statement (LCJM)
Deadline: Deadline 8 (D8) – 16.02.2026
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Executive Summary

LCJM's Deadline 8 Closing Summary Statement addresses only matters already raised during the Examination which remain unresolved to LCJM's satisfaction. It does not request new surveys, a re-run of the ES, or a redesign of the Project. It requests (i) internal consistency in the Applicant's decision narrative and (ii) the minimum audit trail required for the Examining Authority ("ExA") to place material weight on the Applicant's "map-metric" comparators (route length, LWS interaction, residential receptor counts, and watercourse/drainage crossings - a corridor-only count which is not the construction footprint) which the Applicant relies upon to discount the LCJM Hybrid (alternative alignment) and to justify compulsory acquisition ("CA"), temporary possession ("TP") and permanent rights.

Core position: key parts of the Applicant's comparative case remain non-auditable. The Applicant continues to rely on headline GIS outputs and mapping assertions but has not placed on the Examination record the minimum working basis required to test them (measured route geometry/linework, any corridor polygon, constraint layer sources, decision rules and measurement settings). The Applicant's stated inability to "replicate" LCJM's shorter Hybrid measurement is not evidence that the LCJM Hybrid is not shorter; it indicates the measurement basis is not disclosed and the comparator is not decision-safe.

Engagement matters because it determines the reliability of assumptions (not just the outputs). LCJM's evidence is that routing and land-inclusion propositions were raised pre-application (including hybrid routing proposals in August 2023) and pursued formally (including solicitor correspondence requesting route-selection clarifications and a meeting: Mishcon de Reya letter dated 21.12.2023; Applicant/Ardent response dated 23.01.2024 – ExD8.5). LCJM does not accept the Applicant's attempt to characterise the LCJM Hybrid as "nascent". LCJM's case is that the Applicant has not substantively engaged on the assumptions that drive real-world impact—construction access/haul routing, compound siting, working widths, temporary occupation, joint-bay discipline, and drains/services interfaces—despite these being determinative of agricultural, drainage and ecological effects.

Route length has been used inconsistently as a discriminator. The Applicant's optioneering narrative treats route length as a material decision driver— "shortest and most direct" and "more environmental impacts overall" for longer options (ES Chapter 3 – Alternatives & Design Evolution, EN010151-000087, incl. paragraph 6.2.3). The Applicant also advances route length as a climate-efficiency point (Applicant "Climate Change" response, REP5-046, paragraph 2.3.17). Yet when LCJM challenges the stated figures and advances the LCJM Hybrid as the shorter route to the point of connection, the Applicant recasts the difference as "relatively minor" / "not distinguishing" (Applicant response to ExQ3 NED.3.2; and the updated Table 1 / Table ES-1 commentary). LCJM invites the ExA to record this internal tension: **length cannot be decisive when convenient and then "not distinguishing" when disputed**. Either the ExA should require a transparent, auditable, like-for-like measurement rule and then give weight to the outcome or give limited weight to length-based "climate preferable" assertions pending auditability.

Local Wildlife Site (LWS) comparisons are internally inconsistent and rest on unsafe construction assumptions. LCJM's case is that the Applicant treats LWS proximity/interaction as a discriminator against "alternatives" yet accepts substantial longitudinal interaction [1,650 metres] and "double occupation" adjacent to LWS 4722 on the chosen corridor, while simultaneously presenting temporary access as benign.

LCJM points in particular to the Applicant's Outline Soil Management Plan (EN010151-000938, ES Volume 1, Appendix 14.4 Outline Soil Management Plan, Revision 4 – Clean, Appendix 6.3.95, page 6) stating: **"All temporary roadways are existing tracks and do not require soil disturbance."** LCJM's factual correction is that the south-side "double occupation" shown adjacent to LWS 4722 is not an existing track on LCJM land: it is arable field (LCJM Exhibit ExD8.9). LCJM invites the ExA to treat LWS-based comparative conclusions as reduced weight unless the Applicant identifies on the Examination record the precise temporary haul/roadway footprint relied upon and confirms whether it is being treated as "existing track" or arable land occupation with enforceable stripping/reinstatement controls.

Water and drainage impacts are not a "crossings-only" metric. LCJM's position is that Row 10 style comparisons risk being misleading where long longitudinal working close to carrier drains or the Great Hale Eau is treated as equivalent to discrete crossings. Risk is driven by proximity, duration, construction method, and enforceable reinstatement assurance (including pre/post-works condition surveys and monitoring), not just a crossing count. LCJM also emphasises that the Great Hale Eau is not a trivial feature in this locality and that LCJM's operational and regulated water assets (including EA abstraction licences) require a properly evidenced and enforceable approach, not corridor-only screening.

Overall request for the ExA's reporting: LCJM's D8 relief is not "select LCJM's route". It is that the ExA should (1) not place material weight on non-auditable "map-metric" comparators used to discount the LCJM Hybrid; (2) apply heightened scrutiny to the proportionality of CA/TP/permanent rights where the optioneering rationale is internally inconsistent or not reproducible; and (3) require clarity and enforceable constraints where construction logistics and corridor behaviour (haul road siting, longitudinal running, joint bay discipline, reinstatement enforceability) materially affect agricultural operations, drainage, and ecological interface.

Relief summary: To make the comparative exercise decision-safe (and to support a programme-neutral private-treaty outcome), LCJM seeks:

• **Reproducibility:** the underlying GIS inputs and rules for Table ES-1 (linework, any corridor polygon, datasets, decision rules/parameters and measurement settings) so the ExA can test the claimed discriminators.

• **Consistency:** a transparent, like-for-like application of construction-logistics assumptions (access/haul, compounds/laydown, traffic management and duration) wherever the Applicant relies on them to score routes.

• **Programme-neutral private treaty controls:** a voluntary agreement on agreed terms (including consideration) in return for enforceable corridor discipline (mapped access/haul, joint-bay siting limits, reinstatement assurance and audit-grade as-built records), reducing reliance on CA/TP. **These are the same matters that would otherwise be negotiated post-consent through Requirements / protective provisions / Statements of Common Ground / side agreement. LCJM's position is simple: resolve them now by private treaty, programme-neutrally, and reduce reliance on CA/TP.**

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1. What this D8 submission does (and does not do)

1.1 LCJM's Deadline 8 Closing Summary Statement addresses only matters previously raised during the Examination which remain unresolved to LCJM's satisfaction.

1.2 This submission does **not** request new surveys, a re-run of the ES, or a redesign of the Project. It requests:

- internal consistency in the Applicant's decision narrative; and
- the minimum audit trail necessary for the Examining Authority ("ExA") to place material weight on the Applicant's "map-metric" comparators (including route length, Local Wildlife Site ("LWS") interaction, residential receptor counts, and watercourse/drainage crossings) relied upon to discount the LCJM Hybrid route (alternative alignment) and to justify compulsory acquisition ("CA") / temporary possession ("TP") / permanent rights.

1.3 LCJM relies on the Examination record and its prior submissions, including LCJM's Deadline 7 response to ExQ3 (REP6-046) (and the referenced exhibits therein). LCJM invites the ExA to treat the unresolved matters below as going directly to:

(a) the weight that can safely be placed on the Applicant's alternatives/comparative case; and
(b) the downstream **necessity and proportionality** of CA / TP / permanent rights which depend on that case.

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2. Core submission: key elements of the Applicant's comparative case remain non-auditable

2.1 LCJM has repeatedly sought a transparent explanation of the Applicant's route selection rationale from August 2023, including a reproducible basis for the comparative figures relied upon.

2.2 The Applicant continues to rely on headline numbers and GIS-based assertions without supplying the underlying working outputs needed to test them (including route linework/corridor geometry, constraint layer sources, decision rules, and measurement settings).

2.3 Where the Applicant's comparatives are not auditable, LCJM invites the ExA to place limited weight on those elements of the alternatives case, and on any downstream CA / TP / permanent rights conclusions which materially depend upon them.

2.4 Programme-neutral private treaty route remains live (relevance to CA/TP proportionality).
LCJM also records that a programme-neutral private treaty route remains live: LCJM has offered a voluntary agreement framework capable of de-risking delivery while securing farm-specific, enforceable protections and audit-grade as-built records. In those circumstances—and where key "map-metric" discriminators relied upon to discount the LCJM Hybrid remain non-auditable—LCJM invites the ExA to apply heightened scrutiny to the necessity and proportionality of CA/TP and permanent rights, **treating CA/TP as a last resort where a deliverable private treaty framework is available.**

2.5 Cumulative impacts: the Applicant's own baseline decision logic is not reconciled with the current Project.
2.5.1 LCJM remains dissatisfied that the Applicant has provided no decision-safe reconciliation of cumulative impacts in this locality, notwithstanding that the Applicant's own record shows cumulative impact was treated as a determinative project-risk factor when deciding whether to proceed with development on LCJM's land.

2.5.2 In correspondence dated 27 November 2021, the Applicant (James Turley, Low Carbon) declined to proceed with LCJM's land offer "given the acreage available and the proximity to numerous other solar schemes (and therefore project risk through cumulative impact)". (ExD8.12). That decision establishes the Applicant's baseline logic: proximity to other schemes and cumulative effects can be treated as decisive constraints.

2.5.3 Mishcon de Reya expressly raised this issue pre-application, asking how the Applicant had satisfied itself that the same cumulative impact concerns (relied upon in 2021) did not apply to the Project now pursued. (Mishcon letter dated 21.12.2023, ExD8.5).

2.5.4 Since November 2021 the cumulative infrastructure baseline in the Bicker Fen / Viking Link area has materially intensified. The TEC register extracts on the Examination record show an increase in contracted capacity from approximately 99 MW (Nov 2021) to over 2.1 GW (Aug 2024). (ExD8.13). In LCJM's submission, that change increases—not decreases—the need for a transparent, evidenced cumulative assessment and a consistent treatment of "project risk through cumulative impact".

2.5.5 LCJM's point is not that cumulative impacts must automatically prevent consent; it is that the Applicant has not reconciled its own historic decision logic with the current position in a way that is auditable and decision-safe. LCJM therefore invites the ExA to place reduced weight on cumulative-impact headline assertions that are not supported by a transparent audit trail, and to treat the unresolved cumulative context as relevant to the proportionality of CA/TP/permanent rights.

2.6 Fragmentation / "sterile strip" prejudice is a rights-package issue, not a speculative "abortive development" claim.

2.6.1 LCJM records a further proportionality concern that remains unresolved. At ISH1 the Applicant's witnesses accepted on the record that fragmentation / non-contiguous infrastructure can undermine renewables deliverability and viability (ExD8.14). LCJM's case is that the Applicant's chosen west–east alignment imposes the longest continuous constraint across LCJM's rectangular holding (c.3.2 km), bisecting the holding along its greatest length and creating an operational "sterile strip" effect in practice.

2.6.2 The Applicant/Ardent have nonetheless continued to characterise the land interest as "predominantly sub-soil rights" with de minimis value, with severance / injurious affection left to later statutory heads. LCJM does not dispute the statutory framework; the point is practical: if the rights package is drafted and controlled too loosely, the corridor becomes a hard sterilisation constraint in fact (through apparatus proliferation, access/haul routings, and interface uncertainty), regardless of later heads of claim.

2.6.3 LCJM is not advancing a speculative "abortive development" compensation case. The substantive ib vogt materials now on the Examination record (ExD8.15 to ExD8.17) are relied upon as contemporaneous market evidence that credible third parties were progressing co-located PV+BESS propositions on this land and that route geometry / fragmentation is a real-world deliverability constraint. The relevance is to the necessity and proportionality of rights, and to why any voluntary agreement (or DCO powers) must contain express, enforceable corridor-discipline protections (including apparatus location and proliferation limits, joint bay/structure control, as-laid deliverables, time-bound interface/crossings mechanisms, and enforceable reinstatement/aftercare), rather than relying on a "sub-soil only" characterisation.

2.6.4 LCJM therefore invites the ExA to treat the Applicant's current "sub-soil rights only / claim later" stance as insufficient to demonstrate proportionality where the alignment bisects one holding for c.3.2 km and the Applicant has itself acknowledged (on the record) that fragmentation affects viability. Absent clear, enforceable corridor-discipline controls, the rights sought risk going beyond what is necessary. This is the same methodological problem as the "map-metric" comparators: without enforceable, mapped corridor behaviour (apparatus + access + as-laid records), the ExA cannot be confident what is actually being authorised/required across LCJM's holding.

Where the Applicant's own evidence accepts fragmentation impairs deliverability, it is not decision-safe to pair a longest-bisecting alignment with a "de minimis sub-soil rights" framing and leave the corridor's real sterilisation effect to later heads of claim. These defects go directly to the ExA's ability to rely on the Applicant's alternatives case when reporting on necessity/proportionality.

3. Engagement failure: limited liaison on assumptions and repeated meeting requests unresolved

3.1 Engagement goes to reliability of the comparative outputs (inputs, not just conclusions)

3.1.1 LCJM has consistently raised that the Applicant's comparative case is highly sensitive to construction-logistics assumptions (haul/access routing, compound siting, working widths, temporary possession, occupation duration, joint-bay discipline, and drains/services interfaces). These are not minor implementation details: they materially determine agricultural, drainage and ecological interfaces, and therefore the validity of "map-metric" comparisons used to discount the LCJM Hybrid route and justify CA/TP.

3.1.2 LCJM remains dissatisfied that the Applicant has not transparently scoped, disclosed, or stress-tested those assumptions with LCJM as a principal affected landholding (see REP6-046). In LCJM's submission, this engagement deficit reduces the reliability—and therefore the weight—that can safely be placed on conclusion-led comparative outputs.

3.2 Pre-application record: LCJM Hybrid routing and land-inclusion proposals were not "nascent"

3.2.1 The Applicant seeks to characterise LCJM's alternative as a "nascent suggestion" established only for the purpose of comparison during the Examination. LCJM does not accept that framing.

3.2.2 In August 2023, LCJM provided the Applicant **with hybrid cable routing (a mix between the Applicant's own Option 1 cable route and Option 3 – ExD8.10) and land-inclusion proposals**, including a north–south corridor concept intended to reduce unnecessary landowner impacts and to align with the Bicker connection context (ExD8.1). LCJM drew the exact Hybrid Route and put on record that this went through Grade 3 land (ExD8.2). The Applicant acknowledged receipt and confirmed that its land referencing team would review routing proposals, and its planning team would review land-inclusion proposals (ExD8.3, 18.08.2023).

3.2.3 Shortly thereafter, LCJM's agent recorded that the Applicant had indicated it "isn't looking for any more land at this stage", notwithstanding the above referral for internal review (ExD8.4, 31.08.2023).

3.2.4 (Engagement evidence: north–south routing formally raised; response not site-specific.) By letter dated 21 December 2023, LCJM's solicitors (Mishcon de Reya) formally required clarification on multiple route-selection issues including: **why cabling could not be routed north–south**; **why it could not follow Little Hale Fen Road**; whether diversion via Lincolnshire County Council land had been considered; BESS siting; **and how the Applicant reconciled its earlier cumulative impact position with the scheme now advanced** (ExD8.5, Mishcon letter, 21.12.2023). The letter also requested an urgent meeting with LCJM's agent.

3.2.5 The Applicant's subsequent reply (via Ardent) did not provide specific, evidenced, site-specific answers to those points. Instead, it referred back to Chapter 3 ("Alternatives and Design Evolution") of the PEIR and generic consultation material/links and asserted in general terms that the route corridor had been reviewed and iterated (ExD8.6, Ardent email response to Mishcon letter, 23.01.2024). LCJM relies on this as further evidence of an absence of substantive engagement with reasonable, technically grounded alternatives when raised at the proper time.

3.2.6 Land quality context was also raised early. In discussions leading up to the Applicant's November 2021 land approach, LCJM explained that the land being discussed/offered in this locality was predominantly Grade 3 (3a–3b Non Best and Most Versatile (BMV)), and that routing choices should be informed by that reality. These meetings were chaired by Ed Blundy Brown & Co (CAAV) and a land agent present on the Low Carbon Beacon Fen Land Interest Group, and this can be evidenced by him. That context was reiterated in the August 2023 routing/land-inclusion correspondence (ExD8.1–ExD8.3).

3.2.7 This matters to weight. It indicates the limiting factor was not that LCJM's inputs were "nascent", but that the Applicant chose not to engage substantively with those inputs – including Agricultural Land Classification (ALC) type - at a time when engagement could have informed optioneering. LCJM therefore invites the ExA to treat the Applicant's "nascent" characterisation with caution when assessing the safety of relying on the Applicant's comparative conclusions as determinative.

3.3 What remains unresolved (and why it matters)

3.3.1 LCJM remains dissatisfied with the Applicant's engagement approach in this locality, including:

- not liaising with LCJM on key corridor-behaviour and construction logistics assumptions that underpin the Applicant's comparators;
- not meaningfully responding to repeated meeting requests aimed at resolving inputs and assumptions (not merely debating headline outputs); and
- **continuing to advance a CA/TP-dependent approach without first making the comparative basis decision-safe and auditable**.

3.3.2 LCJM invites the ExA to record this engagement deficit as relevant to weight: the less transparent and agreed the underlying assumptions, the less safe it is to rely on the Applicant's comparative conclusions—particularly where those conclusions are used to discount alternatives and to support necessity/proportionality of permanent rights and compulsory acquisition.

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4. Route length: relied upon as a decision driver (including climate efficiency), then minimised as "not distinguishing"

4.1 The Applicant's optioneering narrative treats route length as a material discriminator. In ES Chapter 3 – Alternatives & Design Evolution (EN010151-000087, including para 6.2.3), the Applicant relies on length to discount longer options (longer routes = "more environmental impacts overall") and to present its chosen corridor as the "shortest and most direct" as shown below -

- Option 3 **was unsuitable *primarily due to its length***, "resulting in more environmental impacts overall";
- Options 1 and 2 were broadly similar, **with a *slight preference for Option 1 due to it being shorter***; and
- Option 1 "benefits from being the **shortest and most direct** route".

4.2 The Applicant also advances route length as a climate-efficiency consideration. In REP5-046 ("Climate Change", para 2.3.17), it states in terms that minimising route length is preferable from a climate perspective and that "the shortest route (i.e. the Applicant's) is preferable".

> **Climate Change**
>
> 2.3.17 From a climate perspective, minimising the length of the cable route is preferable in order to deliver the most efficient route in terms of associated emissions, and in order to minimise disturbance to vegetation and ground conditions. The length of each route is already provided in Row 1 of Table 1 and therefore a separate row for Climate Change is not included. The shortest route (i.e. the Applicant's) is preferable from a climate change perspective.

4.2a LCJM further notes that the Applicant's "shortest / climate preferable" framing is difficult to reconcile with the pre-application record. LCJM made land-inclusion and routing offers in November 2021 and August 2023 in the Bicker connection context, including a contiguous, NSIP-scale land block (1,400 acres) with a neighbouring holding (Nick Loweth, East Heckington) represented by Ed Blundy (Brown & Co) in 2023. Those proposals were materially closer to the Point of Connection (c. 1.8 km) and capable of reducing corridor length and associated construction effects yet were not substantively engaged with at the time. LCJM invites the ExA to treat that engagement deficit as relevant to the weight that can safely be placed on the Applicant's later "shortest / climate preferable" narrative.

4.3 However, when LCJM challenges the stated figures and contends (on LCJM's measurements) that the LCJM Hybrid is the shorter route to the point of connection, the Applicant characterises the difference as "relatively minor" and "not a key distinguishing factor" (including in its ExQ3 NED.3.2 response and Table ES-1 commentary).

4.4 LCJM invites the ExA to record the internal tension: **length cannot be deployed as a decision driver (including for climate framing) and then downplayed as non-distinguishing once disputed**. If length is relied upon to discount alternatives and support selection, it must be treated consistently and on a decision-safe basis.

4.5 LCJM also notes that the Applicant's comparative approach is not presented as a whole-route end-to-end comparison in all respects, which further limits what can properly be concluded from headline "shortest / most direct" claims. The issue is addressed in detail at Section A.1.6 (Table ES-1 Row 1), including the consequences for weight where measurements are not reproducible.

4.6 LCJM invites the ExA to reject the Applicant's opportunistic use of length: it cannot be decisive when convenient and "not distinguishing" when disputed. The ExA should either (i) require an auditable, end-to-end, like-for-like measurement rule and then give weight to the outcome (which, on LCJM's case, favours the LCJM Hybrid), or (ii) give limited weight to length-based "climate preferable" assertions until the minimum audit trail and reproducible method are provided on the Examination record.

4.7 LCJM also notes a further length-reduction sensitivity: a crossing of John Cope's field (Title LL431295), which LCJM farms, could further shorten the LCJM Hybrid (ExD8.7). This reinforces why the ExA should not place weight on length-based conclusions absent a transparent, auditable end-to-end measurement rule.

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5. LWS comparators and construction-assumption credibility: LWS proximity used to discount the LCJM Hybrid, yet long longitudinal running / "double occupation" is accepted on the chosen corridor; and the Applicant's "existing tracks" assumption is factually unsafe on LCJM

5.1 This section sits alongside Row 4. Row 4 addresses the **headline metres-based** LWS occupation comparator. The point here is **internal consistency and factual reliability** of the Applicant's LWS-based narrative: the Applicant relies on LWS proximity / constraint as a discriminator when discounting alternatives, yet the chosen corridor accepts a long longitudinal interaction with **LWS 4722**, including an indicative arrangement showing "double occupation" (north and south side) in places and a stated interaction of **c.1,650m within 50m** (as recorded in the Applicant's comparative material on the Examination record and highlighted by LCJM, including REP6-046) – ExD8.8.

5.2 Construction access assumptions — the Applicant's "existing tracks" premise is not reliable on LCJM. The Applicant's Outline Soil Management Plan states: **"All temporary roadways are existing tracks and do not require soil disturbance."** (EN010151-000938, Appendix 14.4 Outline Soil Management Plan (Revision 4 – Clean), ES Volume 1, Appendix 6.3.95, p.6).

5.3 LCJM's factual correction for the Examination record is that the south-side "double occupation" shown adjacent to LWS 4722 is not an existing track on LCJM land: it is arable field. ExD8.9. This is not semantic. It goes to (i) the realism of the Applicant's construction-assumption narrative, (ii) the credibility of any implied "no soil disturbance"

position, and (iii) the weight that can properly be placed on corridor-based comparisons where temporary access is treated as benign by assumption.

5.4 The practical consequence is that the Applicant's map-based presentation risks understating impact in two linked ways: (a) LWS interaction is treated as a discriminator against alternatives, yet long longitudinal running and "double occupation" (approximately 1,650 metres) are presented as acceptable on the chosen corridor; and (b) construction documentation frames temporary roadways as low-impact because they are "existing tracks", but the indicative access/haul arrangement shown adjacent to LWS 4722 requires occupation of cropped land (with associated trafficking, stripping/reinstatement, compaction risk, and soil structure effects). ExD8.9.

5.4a LCJM also records the decisive point for weight: the LCJM Hybrid alignment **avoids 1,650 metres occupation of LWS 4722 entirely** (i.e. it does not intersect that LWS and does not require longitudinal working alongside it). This matters because the Applicant's own optioneering narrative treats proximity to "sensitive receptors including Local Wildlife Sites" as a discriminator against alternatives, yet the chosen corridor accepts prolonged, longitudinal interaction and indicative "double occupation" adjacent to LWS 4722. LCJM invites the ExA to record that this is not a decision-safe use of a constraint: **LWS sensitivity cannot be relied upon to rule out alternatives while being treated as acceptable-by-assumption on the selected corridor.** On that basis, LCJM invites the ExA to place reduced weight on the Applicant's LWS-based comparative conclusions unless and until the Applicant provides an auditable, like-for-like construction footprint (including haul/access) and enforceable controls that prevent corridor creep and longitudinal working effects.

5.4b Construction footprint cannot be "narrative-only" where LWS sensitivity is relied upon as a discriminator. LCJM notes that the Applicant's ecology evidence for the cable route and access roads is presented across topic-specific appendices (e.g. botanical, riparian mammals, breeding birds and bats), but the construction-driven effect pathways—temporary access, haul routes, compounds, runoff/siltation risk and margin disturbance—are not consolidated into a single mapped construction footprint applied consistently across the alternatives comparison. That is the same methodological issue as elsewhere in ES-1: without a like-for-like footprint, corridor-based metrics risk being treated as objective comparators while construction logistics (which drive real effects) remain assumption-led. LCJM therefore invites the ExA to treat LWS-based comparators as screening only unless the Applicant identifies, on the Examination record, a like-for-like mapped construction footprint and enforceable controls preventing longitudinal working and corridor creep.
(Written sources: ES Appendix 7.15 Botanical Survey Report (Cable Route and Access Road) EN010151-000139; ES Appendix 7.19 Riparian Mammal Survey Report (Parts 1–4) EN010151-000143 to -000146; ES Appendix 7.22 Breeding Bird Survey Report EN010151-000149; ES Appendix 7.18 Bat Activity Survey Report EN010151-000142.)

5.5 LCJM also records that the LCJM Hybrid alignment on the Little Hale Drove section has meaningful stand-off from nearby LWS features and does not intersect those LWS designations. LCJM has previously recorded on the Examination record that LWS 4489 (Mill Drain) lies approximately 274m south of the relevant section and LWS 4520 (Willow Farm Drain) lies approximately 177m north. LCJM maintains that it is not decision-safe to discount an alternative on the basis of LWS proximity while, for the chosen corridor, treating substantial longitudinal working / "double occupation" adjacent to an LWS receptor (LWS 4722) as acceptable by assumption. LCJM further notes the cumulative construction context at this location arising from the relatively recent Viking Link onshore works, which reinforces why LWS-related comparisons should be based on mapped, like-for-like construction footprints and duration assumptions rather than corridor-only screening.

5.6 LCJM invites the ExA to record that, unless the Applicant provides an auditable and enforceable explanation, (i) the Applicant's LWS-based decision narrative is internally inconsistent (LWS proximity treated as determinative against the LCJM Hybrid while the chosen corridor tolerates long longitudinal interaction and "double occupation" alongside LWS 4722); and (ii) the Applicant's soil/access assumptions are not reliable on LCJM where temporary

roadways are shown across arable land but the Outline SMP assumes they are existing tracks that “do not require soil disturbance”.

5.7 Remedy (for ExA reporting): the ExA should place reduced weight on LWS-based comparative conclusions and on any “benign access” premise unless the Applicant identifies, on the Examination record, the **exact temporary haul road/roadway geometry** relied upon adjacent to LWS 4722 and confirms whether it is being treated as: (a) “existing track” (per the Outline SMP assumption), or (b) **arable land occupation** with associated soil stripping, trafficking, reinstatement and enforceable controls. If the Applicant’s position is that haul roads are “indicative / can change”, LCJM invites heightened scrutiny of proportionality and enforceability of the rights package (constraints on longitudinal running, siting discipline, reinstatement enforceability, and limits preventing corridor creep).

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6. Repeating pattern across ES-1: corridor-only metrics, with construction logistics carved out

6.1 A consistent issue runs through the Applicant’s updated Table ES-1 comparisons: many “quantitative” comparators are, in practice, **corridor-geometry screens** (buffers from an indicative corridor edge or centreline), while **construction logistics** (access/haul routing, compounds, temporary roadways, traffic management and duration) are treated separately in narrative.

6.2 This separation is outcome-determinative. It allows corridor-based counts (LWS, receptors, air quality and watercourse crossings) to be presented as objective comparators while the **mapped construction footprint** that drives real effects is not applied on a transparent, like-for-like basis to both corridors.

6.3 LCJM accordingly invites the ExA to treat corridor-only comparators as **screening value only** unless the Applicant provides a decision-safe audit trail showing: (a) the route geometry and corridor polygon used, (b) the measurement rule (edge vs centreline; buffer basis), and (c) the construction access/haul/compound footprint assumed for each corridor.

The detail is set out row-by-row in Appendix 1 (Table ES-1 final commentary on the applicant’s D7 responses). Accordingly, ES-1 metrics should be treated as screening only, not determinative comparators.

Appendix 1. **LCJM Response to Applicants Matrix Claims – Closing Statement – D8**

A.1 Row 1: Total Corridor Length (Applicant response at D7, §2.2)

Row	Aspect	Beacon Fen Indicative Cable Route	LCJMF's Amended Alternative	LCJMF comments	Applicant's summary comments at Deadline 7	LCJM Closing Statement comments at D8
1	Total Corridor Length	6,818 metres Applicant's position (unchanged from Comparative Analysis): ~~6.87km~~	6,786 metres Applicant's position (unchanged from Comparative Analysis): ~~6.93km~~	The LCJM Hybrid route can be even shorter by going across John Cope's field LL432195 (which we farm). Low Carbon already have an agreement in place with John Cope for a more northerly crossing.	Using its professional-grade GIS software, the Applicant cannot replicate the lengths that LCJMF has generated using Google Earth. The LCJMF Amended Alternative adopted for the Applicant's Comparative Analysis was the route proposed by LCJMF in **REP2-051** and which LCJMF directed in **REP4-037** must be used for the comparison. The Applicant cannot reasonably be expected to pre-empt further amendments to that route for the purpose of its analysis or have to continually repeat its analysis as LCJMF changes its proposal to respond to criticisms of its route. See further **section 2.2** below.	**LCJM position:** the LCJM Hybrid route is shorter on the evidence filed (ExD6.8 / REP6-047). The Applicant's "cannot replicate Google Earth" is not a decision-safe rebuttal without disclosure of (i) the measured linework, (ii) defined start/end points, and (iii) measurement settings used to generate the stated figures. **See §2.2 and §10**

A.1 Row 1: Total Corridor Length (Applicant response at D7, §2.2)

A.1.1 Corridor length: LCJM position and auditability

LCJM position: the LCJM Hybrid route is shorter on the evidence filed on the Examination record (including ExD6.8 / REP6-047). The Applicant's response—that it used ArcGIS Pro "Calculate Geometry" (planar length; British National Grid) and "cannot replicate Google Earth"—is not a decision-safe rebuttal to that filed evidence without disclosure of the minimum audit trail needed for the ExA (and LCJM) to reproduce and test the figures.

A generic description of software/tool and coordinate system does not resolve a measurement dispute. The missing working basis is:
(i) the actual route geometry/linework measured (i.e. the centreline/line(s) used for the calculation);
(ii) the defined start and end points used (and confirmation whether the comparison is section-only or end-to-end); and
(iii) any material measurement rules/settings applied (e.g. whether lengths are taken from the as-drawn centreline or a generalised/simplified line).

Absent that disclosure, the Applicant's "cannot replicate" statement amounts to an assertion rather than a verifiable comparator. (See also §2.2 and §10.)

A.1.2 "Relatively minor" is not a complete answer where length is used as a discriminator

The Applicant now suggests any length difference is "relatively minor" and "not a key distinguishing factor". LCJM invites the ExA to record that this sits uncomfortably with the Applicant's own optioneering narrative, where route length is relied upon as a discriminator.

In ES Chapter 3 – Alternatives & Design Evolution (EN010151-000087, incl. para 6.2.3), the Applicant's narrative is, in substance, that:

- Option 3 was unsuitable primarily due to its length ("more environmental impacts overall");
- Options 1 and 2 were broadly similar, with a preference for Option 1 because it was shorter; and
- Option 1 "benefits from being the shortest and most direct route".

The same logic appears in the Applicant's climate framing: "From a climate perspective, minimising the length of the cable route is preferable… The shortest route (i.e. the Applicant's) is preferable from a climate change perspective" (REP5-046, para 2.3.17).

> **Climate Change**
>
> 2.3.17 From a climate perspective, minimising the length of the cable route is preferable in order to deliver the most efficient route in terms of associated emissions, and in order to minimise disturbance to vegetation and ground conditions. The length of each route is already provided in Row 1 of Table 1 and therefore a separate row for Climate Change is not included. The shortest route (i.e. the Applicant's) is preferable from a climate change perspective.

If length is relied upon as a discriminator in the optioneering narrative (and as part of a climate-efficiency case), it cannot then be downplayed as "not distinguishing" once the figures are challenged. In any event, because the Applicant deploys length in its alternatives case and downstream CA/TP proportionality case, the measurement basis must be decision-safe and auditable**.**

A.1.3 Section-only comparison: the Applicant's own approach limits what can be concluded

LCJM also notes that the Applicant's methodology uses common start/end points where alignments intersect, such that the reported "length" figures may relate only to alternative sections, rather than an end-to-end whole-route comparison. The ExA should therefore treat any "shortest / most direct" or "climate preferable" conclusion as not established unless the Applicant identifies precisely what section(s) were measured and explains how a section-only comparison supports an end-to-end selection claim.

A.1.4 "Continual re-runs" is not LCJM's case

The Applicant's suggestion that it cannot be expected to "continually repeat its analysis" mischaracterises LCJM's position. LCJM is not seeking repeated re-runs or redesign. LCJM seeks the minimum reproducible mapping outputs required for the ExA to test a quantified comparator that the Applicant relies upon: the measured linework, defined start/end points, and any material measurement rules/settings.

A.1.5 Further shortening point: relevance is engagement/opportunity, not redesign

LCJM's observation that the LCJM Hybrid could be shorter via an available crossing (green line below) is not advanced as a demand that the Applicant should have "pre-empted" amendments, nor as a request for redesign. It is relied upon for limited purposes: (i) to underline that routing/land options and local inputs were raised pre-application and are not fairly dismissed as "nascent"; and (ii) to reinforce why the ExA should be cautious about conclusion-led reliance on non-auditable length claims as determinative.

A.1.6 Requested ExA treatment / consequence for weight

Accordingly, LCJM invites the ExA to place limited weight on the corridor-length comparator (and any “shortest / most direct / climate preferable” reasoning derived from it) pending disclosure on the Examination record of the minimum audit trail at §10:

(i) the route geometry/linework measured;

(ii) defined start/end points (and whether section-only or end-to-end); and

(iii) any material measurement rules/settings applied.

A.2 (Row 2 – what the metric is really proxying in the Fens / Fenland)

Row	Aspect	Beacon Fen Indicative Cable Route	LCJMF's Amended Alternative	LCJMF comments	Applicant's summary comments at Deadline 7	LCJM Closing Statement comments at D8
2	East-West Field Crossing	All fields across LCJM land in Great Hale Fen in the west to east pathway will cross north / south land drains every 21 yards Applicant's position (unchanged from Comparative Analysis): 10 fields crossed and c. 4.5km of cable route in an east-west orientation	No LCJM fields will have land drainage cut due to north south passage alongside north south drainage (parallel existence) Applicant's position (unchanged from Comparative Analysis): 12 fields crossed and c. 4.3km of cable route in an east-west orientation		LCJMF's information for this factor only relates to drain crossings on its own land, rather than considering drain crossings on other landowners' fields. That clearly does not provide an objective overall comparison between the routes. LCJMF does not dispute the figures provided by the Applicant for this factor, but unfairly suggests that they cannot be relied upon without further (and, the Applicant would say, disproportionate) contextual information. See further **section 2.3** below.	Row 2 is not a neutral "map-metric" in this drained fenland context. On LCJM's Grade 2 potato land, an east–west bisection cuts across dense north–south land-drain laterals (typically c. every 21 yards), with obvious implications for drain integrity, jetting access, reinstatement risk and long-term performance. LCJM cannot evidence the spacing/layout of every neighbouring system; that is the Applicant's task if it wishes to rely on Row 2 as a discriminator across multiple holdings. Absent a transparent, proportionate method for non-LCJM land, the ExA should treat "fields crossed / east-west length" as limited context only, not a determinative comparator.

A.2.1 LCJM position: Row 2 is not a neutral "map-metric" in drained fenland

LCJM accepts that "fields crossed" and "east–west length" can be relevant descriptors in principle. However, in the Great Hale Fen drained-fenland context Row 2 is not an abstract or aesthetic comparator. On LCJM's Grade 2 potato land, an east–west bisection cuts across dense north–south land-drain laterals (typically c. every 21 yards), with obvious implications for:
(i) drain integrity during works; (ii) reinstatement interfaces and long-term performance; (iii) jetting access and maintenance constraints; and (iv) long-term crop performance/soil structure.

Accordingly, if the Applicant wishes to rely on Row 2 as a discriminator, it must explain what pathway Row 2 is meant to proxy (drainage integrity and maintainability), not simply present "fields crossed / east–west length" as if it were inherently comparable in consequence.

A.2.2 LCJM evidence on its own holding: why east–west bisection is high consequence

LCJM can speak directly to its own system. In this locality, the field drainage is north–south orientated and installed at dense spacing. A long east–west corridor therefore drives repeated drain interfaces and reinstatement points. The practical risk is not merely construction disruption; it is also future maintainability (jetting runs, fault diagnosis, access to outfalls) and long-term system performance.

This is why Row 2 cannot be treated as a simple "count and compare" exercise on LCJM's holding. Its significance is the drainage pathway it represents.

A.2.3 (Row 2 – neighbouring holdings: not LCJM's burden, but the Applicant's comparator must still be decision-safe)

The Applicant's D7 response accepts (in substance) that LCJM's evidence for this factor relates to **drain crossings on LCJM land** and does not provide an objective comparison across other landowners' holdings. LCJM agrees: LCJM cannot reasonably be expected to evidence the spacing/layout and maintenance constraints of every neighbouring private drainage system.

However, that does not cure the problem if the Applicant still seeks to deploy Row 2 as an "objective discriminator" across multiple holdings. If Row 2 is to be relied upon as a cross-holding comparator, the Applicant must adopt and disclose a **proportionate, transparent method** for non-LCJM land—i.e. a stated proxy/assumption set (drainage typologies/densities for the affected fenland blocks), or equivalent evidential basis—rather than presenting "fields crossed / east–west length" as determinative by implication.

A.2.4 (Requested ExA treatment / weight)

Accordingly, LCJM invites the ExA to treat Row 2 as **limited context only** and to place **limited weight** on any conclusion derived from it unless and until the Applicant explains, on the Examination record:
(i) what impact pathway Row 2 is intended to proxy in drained fenland; and
(ii) the transparent method by which it has ensured that the proxy is **not misleading across different holdings**, including non-LCJM land.

A.3 Row 3 – Number of affected landowners: Row 8a governs the counting rule, and the Applicant's §2.4 response shifts the metric

Row	Aspect	Beacon Fen Indicative Cable Route	LCJMF's Amended Alternative	LCJMF comments	Applicant's summary comments at Deadline 7	LCJM Closing Statement comments at D8
3	Number of affected landowners	11 Applicant's position: As at the date of the Comparative Analysis, the Applicant's tally of **13** distinct	6 Applicant's position: **19** distinct registered freeholders and at least **2** distinct unregistered		The difference in numbers between LCJMF and the Applicant primarily results from differing methodologies for counting being applied. To the extent it understands LCJMF's	Core-12 Row 8a set the methodology: **"count each beneficial freehold owner once, irrespective of number of titles; no title-counting." Row 3 follows that rule and compares *distinct affected owners* on each corridor.** The Applicant's §2.4 response largely shifts the goalposts by recasting Row 3 as "distinct negotiation counterparties" (counting co-owners separately, separating corporate/personal capacities, etc.). If those refinements are said to be relevant, they belong under Row 8b (total affected interests), not the Row-3/8a headline. In any event, the Applicant has not provided a transparent, reproducible, deduplicated schedule that the ExA can test (including treatment of redactions/unregistered land). LCJM's evidence (ExD6.17–ExD6.18) is that the LCJM Hybrid adds only a small number of genuinely additional owners (maximum c.3, subject to unregistered/TBC resolution) while relieving a larger group on the Applicant's corridor, producing a net reduction in distinct affected owners. LCJM invites the ExA to place limited weight on the Applicant's Row-3 headline unless the Applicant discloses the underlying deduplicated owner list and rules applied.
		registered freeholders and **3** distinct unregistered freeholders was correct using the Applicant's original methodology. Reflecting a subsequent transfer of land, the tally is now **16** distinct registered freeholders and **3** distinct unregistered freeholders using that same methodology, as title LL135546 has been transferred by Shirley Ann Pugh to Stephen Pugh, Miranda Pugh, Kathryn Pugh and Pengethley Potatoes Limited. Treating joint co-owners of a registered title as a single negotiation counterparty results in there being **13** negotiation counterparties. If LCJMF is combined with Leslie and Patricia Mountain, this reduces to **12**.	freeholders, the tally in the Comparative Analysis, remains correct using the Applicant's original methodology. Treating joint co-owners of a registered title as a single negotiation counterparty results in there being **15** negotiation counterparties. If LCJMF is combined with Leslie and Patricia Mountain, this reduces to **14**.		methodology, the Applicant does not agree with elements of it. Adopting the elements that it considers valid, the number of distinct negotiation counterparties remains fewer for the Applicant's Indicative Cable Route than for the LCJMF Amended Alternative. See further **section 2.4** below.	
	Notes		3 **new** landowners introduced by LCJM Hybrid and 10 Beacon Fen landowners dropped	Net reduction of 7 landowners affected	Please see row immediately above.	

A.3.1 LCJM position: Row 8a governs the counting rule, and Row 3 is the headline application of it

Table ES-1 frames Row 3 as **"Number of affected landowners."** Core-12 Row 8a set the optioneering/comparator counting methodology: **count each beneficial freehold owner once, irrespective of number of titles (no title-counting).** Row 3 is therefore the headline application of that rule—i.e. a deduplicated comparison of **distinct affected owners** on each corridor.

A.3.2 The Applicant's §2.4 response shifts the metric to "negotiation counterparties"

The Applicant's §2.4 response does not answer Row 3 on Row-8a terms. Instead, it largely reframes Row 3 as **"distinct negotiation counterparties"**, by introducing refinements such as: counting co-owners separately, disaggregating corporate/personal capacities, and other schedule-led subdivisions. That may be a different way of describing negotiation complexity, but it is **not** the Row-3 / Row-8a owner-count metric.

A.3.3 If those refinements are said to matter, they belong under Row 8b, not Row 3

If the Applicant contends those refinements are relevant, LCJM's position is that they properly sit under **Core-12 Row 8b (total affected interests)**—freeholders, tenants/occupiers, options/conditional contracts, easements/wayleaves, covenant beneficiaries, statutory undertakers/IDBs, PRoW/highway interests, etc.—not under the **Row-3/Row-8a** headline owner count. Mixing the two makes the comparison unstable and risks overstating LCJM Hybrid "complexity" by moving the goalposts.

A.3.4 Auditability point: no transparent, reproducible, deduplicated schedule is provided

In any event, the Applicant has not provided a transparent, reproducible, deduplicated schedule the ExA can test—particularly given acknowledged issues of **PINS redactions** and **unregistered/TBC land**. Without an auditable owner list showing:
(i) the owners counted on each corridor;
(ii) the deduplication rules applied; and
(iii) how unregistered/TBC interests are treated,
the Applicant's Row-3 tallies are not decision-safe as a comparative discriminator.

A.3.5 LCJM evidence: Hybrid adds only a small number of genuinely new owners and removes significantly more

LCJM's evidence (ExD6.17–ExD6.18) is that—on a Row-8a basis—the LCJM Hybrid introduces only a small number of genuinely additional distinct owners (**maximum c.3, subject to unregistered/TBC resolution**) while relieving a larger group affected by the Applicant's corridor, producing a **net reduction** in distinct affected owners overall.

The LCJM Hybrid is introducing [redacted] and [redacted] west of the South Forty Foot and the land east of the South Forty Foot between [redacted] (Donington) - who is affected by both routes - which are

- **LL395174** [redacted]
- LL241762 [redacted] *who is affected by both routes*

Therefore, a maximum 3 NEW affected landowners (Needham, Nickols and Slater) and relieving 10 landowners from the Beacon Fen cable route; namely –

1) [redacted] – LL286255 (4.05 ha)

2) LCJM west to east - LL57121, LL331998 and LL55575

3) [redacted] **[Mountain SSAS]** LL165588

4) Environment Agency - LL320274

5) [redacted] - LL135546

6) [redacted] - [see Applicant's Land Tracker map below]

7) Bicker United Charity - [see Applicant's Land Tracker map below]

8) [redacted] - [see Applicant's Land Tracker map below]

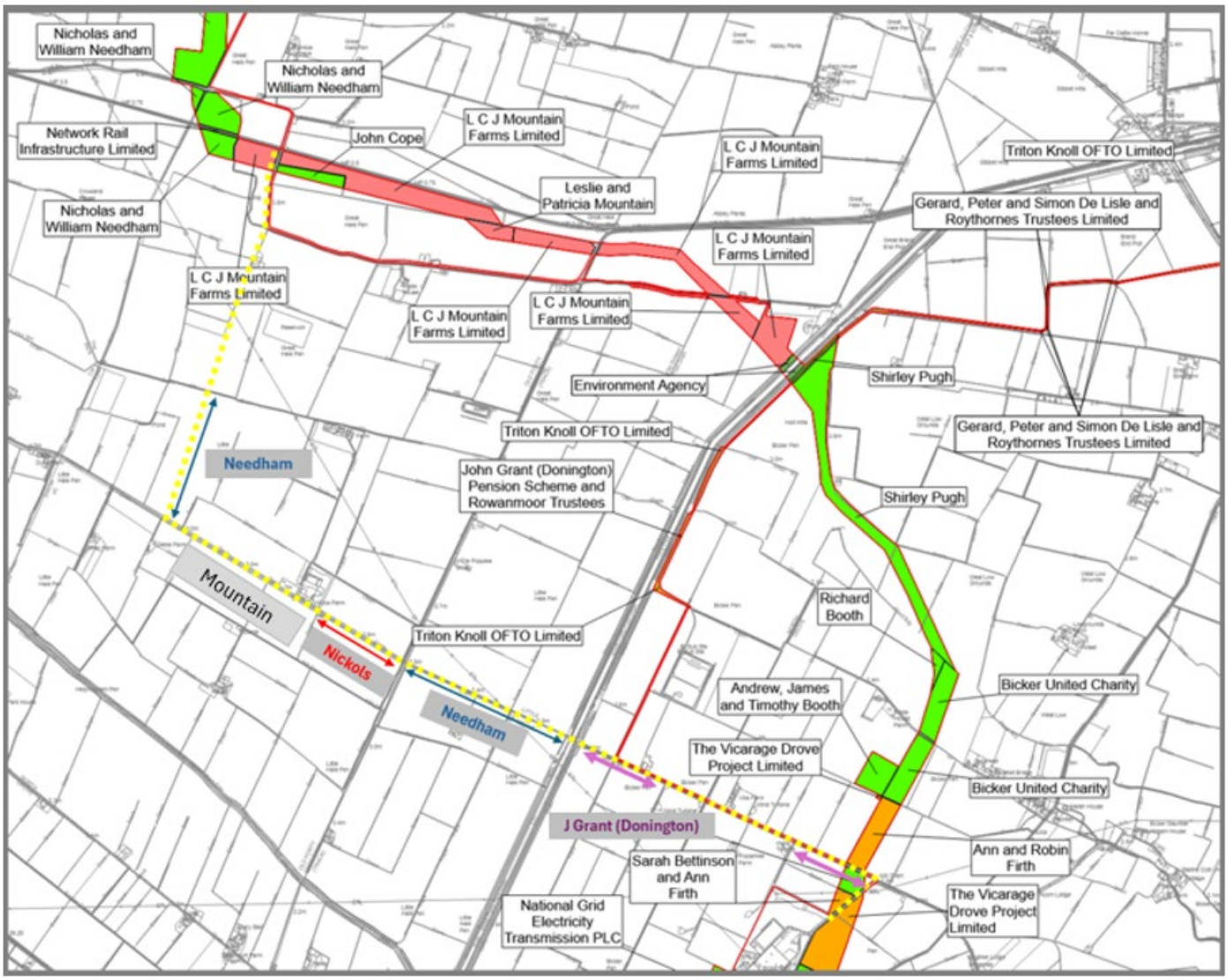
9) [redacted] - [see Applicant's Land Tracker map below]

10) The Vicarage Drove Project - [see Applicant's Land Tracker map below]

11) [redacted] LL165569 - *affected by both routes*

This is a reduction of 10 affected landowners (**the bold names above; Cope, LCJM, Mountain SSAS, EA, S Pugh, R Booth, Bicker United Charity, A+T Booth, Firth and the Vicarage Drove project**) and therefore a net reduction of 7 affected landowners.

<u>The Applicant's own Detailed Land and Rights Negotiation Tracker</u>



A.3.6 Requested ExA treatment / consequence for weight

Row 3 is **"number of affected landowners."** On any common-sense reading, that is a deduplicated count of distinct freehold owners affected by the corridor, with each owner counted once and not re-counted by title multiplicity or internal disaggregation.

On that basis, **LCJM (and Leslie/Patricia Lynne Mountain) should not be treated as additional "affected landowners" on the LCJM Hybrid**: LCJM is the proposing landholder and, in any event, is already affected under the Applicant's corridor.

LCJM therefore invites the ExA to place **limited weight** on the Applicant's Row-3 headline unless and until the Applicant discloses the underlying **deduplicated owner list for each corridor** (and the rules applied), so the ExA can test who is counted once and who is genuinely additional—including how redactions and unregistered interests have been handled.

A.4 Row 4: Ecology – Local Wildlife Site interaction (Applicant response at D7, §2.5)

Row	Aspect	Beacon Fen Indicative Cable Route	LCJMF's Amended Alternative	LCJMF comments	Applicant's summary comments at Deadline 7	LCJM Closing Statement comments at D8
4	Ecology – Local Wildlife	1,650 metres of LWS 4722 – both the north and south side	0 metres		Notably, LCJMF's table does not reproduce the number of	Row 4 in Table ES-1 is a **metres-based comparator of LWS occupation / longitudinal interaction**, not a "count of LWS crossings". On its face, it records that the Applicant's indicative corridor entails **c.1,650m** of longitudinal interaction with **LWS 4722** (including "double occupation" north and south in places, in a locality already cumulatively affected by Viking Link), whereas the **LCJM Hybrid reports 0m** occupation of LWS 4722. The Applicant's §2.5 response largely **changes the metric** by pivoting to "LWS crossed" (2 vs 3) and then attempting to rebut the Row-4 alignment comparator with **assumption-led construction logistics** (compounds/haul roads) for the LCJM Hybrid. That is not a like-for-like answer to Row 4. If the Applicant wishes to rely on haul road/compound ecology to score the LCJM Hybrid down, it must present an **auditable, consistently-defined schedule for both routes** (assumed haul geometry, start/end points, corridor width, and the basis for accept/reject viability), rather than substituting an Applicant-chosen access option and treating the resulting outcome as inherent. In particular, the Applicant's position that it has "insufficient information" to confirm viability of LCJM's access concept (dotted black line on ExD6.24) is **not decision-safe** as a rebuttal: if the Applicant is relying on access assumptions to negate the 0m figure, it must either **accept LCJM's access as a reasonable comparator**, or **explain with objective constraints** why it is not viable and why the substituted access is the appropriate comparator. LCJM accordingly invites the ExA to **record Row 4 on its stated terms** (occupation/longitudinal interaction), to place weight on the quantified difference (**c.1,650m vs 0m**), and to place **limited weight** on the Applicant's "haul road/compound" rebuttal unless and until an auditable, like-for-like construction-logistics schedule is disclosed on the Examination record.
	Site occupation	(and already affected in 2023 by Viking Link – i.e. cumulative impact) Applicant's position: 2 LWS crossed (Great Hale Eau and South Forty Foot Drain) 1,650m of haul roads running within 50m of an LWS (both unchanged from the Comparative Analysis)	Applicant's position: 3 LWS crossed (Mill Drain, Old Forty Foot Drain and South Forty Foot Drain) (unchanged from the Comparative Analysis). 0m of haul roads running within 50m of an LWS appears to be based on LCJMF's proposal for an amended haul road. The Applicant does not dispute that the amended route does not longitudinally interact with an LWS, but cannot verify whether it is suitable for cable route construction access.		LWSs crossed by each indicative route. LCJMF instead focusses its attention on the longitudinal interaction of the Applicant's proposed haul roads with LWS 4722, replicating information from the Applicant's Comparative Analysis for the Beacon Fen Indicative Cable Route and asserting 0m of interaction for the LCJMF Amended Alternative. See further **section 2.5** below.	

A.4.1 What Table ES-1 Row 4 is measuring (and why the heading matters)

Row 4 in LCJM's Table ES-1 is **not** a "count of Local Wildlife Site (LWS) crossings". It is a **metres-based comparator of LWS occupation / longitudinal interaction**, focused on the Applicant corridor's interaction with **LWS 4722** (in a locality already cumulatively affected by Viking Link). The Applicant's pivot to "LWS crossed" changes the metric and understates the impact pathway being compared.

A.4.2 The Row-4 comparator is not answered by "crossings"

The Applicant records "LWS crossed" (2 vs 3) and then treats that as responsive. LCJM's point is narrower and decision-critical: Row 4 records that the Applicant's indicative corridor entails **c.1,650m of longitudinal interaction / occupation of LWS 4722** (including "double occupation" north and south in places), whereas the **LCJM Hybrid reports 0 metre** occupation of any LWS site. Crossings are not the same impact pathway as longitudinal occupation, and the ExA should treat them as different metrics.

A.4.3 Compounds/haul roads are not a substitute rebuttal to the Row-4 metric

The Applicant attempts to rebut a route-alignment comparator (metres of LWS occupation) by introducing assumed compounds and assumed access/haul routes for the LCJM Hybrid. That is **not** a like-for-like answer to Row 4. If the Applicant wishes to advance a separate "construction-logistics ecology" comparison, it must be **defined and auditable** (what is being measured; using what geometry; over what corridor width; between what start/end points; and on what evidential basis) and then applied consistently to **both** routes. It cannot displace the headline Row-4 fact that the Applicant alignment runs longitudinally alongside/within LWS 4722 for a material length whereas the LCJM Hybrid does not.

A.4.4 Assumption-led access: the Applicant cannot manufacture LWS interaction and treat it as inherent

The Applicant's §2.5 narrative depends on selecting access assumptions for the LCJM Hybrid (including "Access Option 1") and then using those assumptions to assert greater LWS interaction. That is inherently unstable: it introduces an Applicant-chosen variable and then treats the resulting outcome as an attribute of the LCJM Hybrid. LCJM's evidence (including **ExD6.24**) shows a plausible access concept consistent with the **0 metre** longitudinal LWS interaction figure recorded in Table ES-1. If the Applicant disputes that access concept, it must do so by reference to objective constraints, not by substituting a different access that drives a worse outcome and then presenting that outcome as determinative.

A.4.5 "Insufficient information" is not a decision-safe basis to substitute an Applicant-chosen access

The Applicant states it has "insufficient information" to confirm viability of the LCJM access concept (dotted black line in ExD6.24) and therefore prefers its assumed "Access Option 1". That is not a decision-safe rebuttal. If the Applicant relies on access/haul routing to score the LCJM Hybrid down on ecology, it must either:
(i) accept LCJM's access concept as a reasonable comparator (so Row 4 remains **0m** longitudinal interaction), or
(ii) explain, by reference to **objective constraints** (e.g. radii/geometry, widths, third-party rights, axle loads/structures, deliverability), why it is not viable and why the substituted access is the appropriate comparator.
A bare "insufficient information" statement cannot justify substituting an Applicant-chosen access alignment that drives a worse ecological outcome and then treating that outcome as inherent to the LCJM Hybrid.

A.4.6 Access proposals from a different scheme do not make the Applicant's comparator decision-safe

The Applicant's reliance on access proposals associated with a different scheme (23/1021/FUL) does not establish that the same access is the appropriate comparator for the LCJM Hybrid here, nor does it justify treating an assumed access alignment as determinative of LWS interaction in this optioneering matrix. The ExA should be cautious about importing a different project's access solution to score the LCJM Hybrid down on ecology.

A.4.7 EN-1 §4.3.29 does not cure non-auditable, assumption-led scoring

The Applicant's reliance on EN-1 §4.3.29 (about third-party alternatives raised post-submission) does not answer the point in issue. LCJM is not seeking detailed re-optioneering; LCJM seeks **like-for-like, auditable comparators**. Further, LCJM's routing / land-inclusion propositions were raised pre-application and pursued formally thereafter. In any event, once the Applicant chooses to introduce access/haul assumptions to rebut Row 4, it must evidence those assumptions and explain—by reference to objective constraints—why LCJM's access concept is not viable if that is its case. A policy citation cannot convert an assumption-led rebuttal into decision-safe evidence.

A.4.8 Requested ExA treatment / consequence for weight

Accordingly, LCJM invites the ExA to:
(i) record Row 4 on its stated terms as **LWS occupation / longitudinal interaction**, not "crossings";
(ii) place weight on the quantified comparator that the Applicant corridor entails **c.1,650m** longitudinal interaction with **LWS 4722** whereas the LCJM Hybrid reports **0m** occupation; and
(iii) place limited weight on any "haul road/compound/access" rebuttal unless and until the Applicant provides an auditable, consistently defined schedule for **both** routes (including assumed access geometry, measurement basis, and the objective reasons relied upon to accept/reject viability).

A.5 Row 5 – Landscape & Visual / residential receptors: corridor-only counting excludes residential properties

Row	Aspect	Beacon Fen Indicative Cable Route	LCJMF's Amended Alternative	LCJMF comments	Applicant's summary comments at Deadline 7	LCJM Closing Statement comments at D8
5	Landscape & Visual – residential properties <350 metres	10 Applicant's position: Adopting 'on-the-ground' information from LCJMF on non-residential properties, there remain **6** residential receptors	5 Applicant's position: Adopting 'on-the-ground' information from LCJMF on non-residential properties, there are **6** residential receptors		The Applicant has updated its counts of residential properties in the vicinity of the routes based on ground-based observations by LCJMF that contradict the information the Applicant obtained from the industry standard residential	The Applicant's response does not engage with Row 5 on its stated terms. Row 5 is a **<350m residential proximity** comparator (Table ES-1), yet the Applicant substitutes a **<300m** count derived from OS AddressBase (and then treats LCJM's <350m figures as "unverified"). That is a change of metric, not a rebuttal. LCJM also notes the Applicant has already accepted that **AddressBase misclassifies** receptors locally (farm buildings / disused dwellings) and has amended its <300m numbers following LCJM's site evidence. In those circumstances, it is not decision-safe for the Applicant to say it "cannot verify" LCJM's <350m count while relying on the same desk dataset and GIS capability. **Requested ExA treatment / audit remedy:** LCJM invites the ExA to place limited weight on the Applicant's residential-receptor comparison unless the Applicant provides an auditable schedule for **both routes** that: reports counts at **<350m** (to address Table ES-1) and, if relied upon, **<300m** as a sensitivity; lists the addresses counted and identifies any exclusions with reasons (non-residential / disused / agricultural only); and states clearly whether **construction access/haul** receptor effects are excluded by definition or have been incorporated like-for-like for both routes. (Separately: PRoW crossings are a distinct metric. Their inclusion/exclusion does not justify changing Row 5's residential proximity metric, and should be addressed transparently as its own comparator rather than used to deflect from the <350m residential schedule.)
		within 300m (unchanged from the Comparative Analysis). 1 PRoW is crossed (Swhd/13/1) (unchanged from the Comparative Analysis).	within 300m (update to the Comparative Analysis). 5 PRoW are crossed (GtHa/2/1, GtHa/1/2, LHal/4/1, LHal/5/1 and Bick/1/1) (unchanged from the Comparative Analysis).		address database it used for its desk-based analysis. However, the Applicant cannot verify the different numbers asserted by LCJMF, nor does it understand why an increased radius of 350m, as used by LCJMF, is justified. Further, LCJMF omits the number of PRoW crossed by each route from its Table ES-1 – the Applicant continues to consider this a relevant comparator. See further **section 2.6** below.	

A.5.1 (Lead point – corridor-only counting is the core defect)
Row 5 is presented as a *residential proximity* comparator. However, the Applicant's approach remains a *corridor-only* desk screen: it counts properties by reference to proximity to the indicative cable corridor, while treating construction access/haul routing, traffic management, compounds and laydown arrangements separately in narrative or assumption-led commentary. The consequence is that residential properties affected in practice by construction traffic and access can be excluded from the headline "count", even though those receptors may experience the principal day-to-day amenity effects during the works period. That is not a decision-safe discriminator between routes.

A.5.2 (Metric mismatch – the Applicant answers a different question)
LCJM's Table ES-1 Row 5 is framed as a **<350m** residential proximity comparator. The Applicant's response instead advances a **<300m** count and then treats LCJM's <350m position as "unverified". That is a **change of metric**, not a rebuttal to Row 5 on its stated terms.

A.5.3 (Why 300m appears in the Applicant material – and why it does not displace 350m)
The Applicant's comparative material explains that it used **300m** as its chosen proximity screen for residential properties in the matrix. LCJM does not dispute that the Applicant can report a 300m count if it wishes. The point is that Row 5 in Table ES-1 is **<350m** and should be answered as such. A 300m figure can only sensibly be treated as a **sensitivity**, not as a substitute for the Row-5 metric.

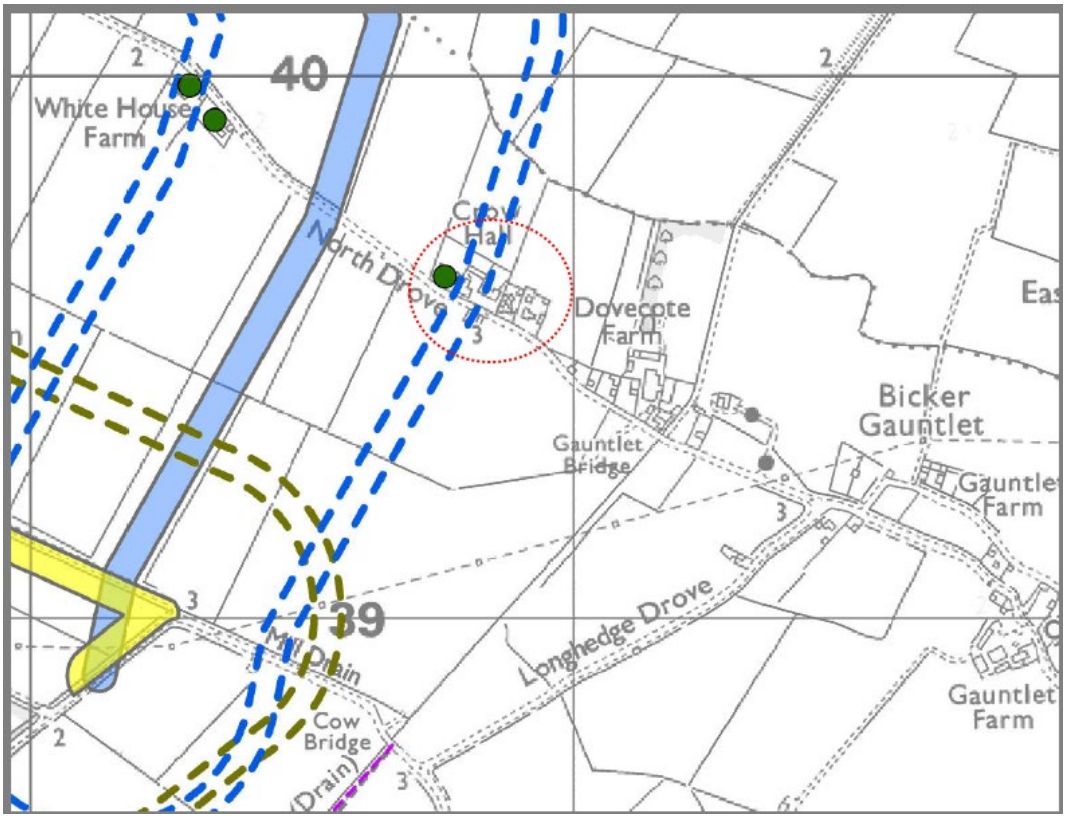
A.5.4 (Why it can be 350m – and why "cannot verify" is not decision-safe)
There is nothing inherently improper about **350m** as a desk-based proximity buffer for a comparative amenity/LV screen, particularly where the Applicant accepts post-consent flexibility (micro-siting within a corridor, working width and construction logistics) and where small methodological choices materially affect counts in a dispersed rural setting. If the Applicant has GIS capability to generate a 300m schedule, it can generate a **350m schedule** on the same dataset and rule set. In those circumstances, an "unable to verify" stance is not a reliable basis on which the ExA can place weight, especially where the Applicant has already accepted local AddressBase misclassification (farm buildings / disused dwellings) and amended its own desk counts following LCJM's on-site evidence.

A.5.5 (Construction access/haul needs to be inside the comparator – not carved out)
LCJM's concern is that the Applicant's corridor-only approach risks **excluding** residential receptors whose amenity effects arise primarily from **construction access and traffic**, rather than the trench line itself. This matters on the Applicant's Option 1 context where **The White House and Mountain Cottage** are sensitive to construction traffic and access arrangements, and where those same receptors (along with Mastins House and others) have already experienced relatively recent **cumulative construction disturbance associated with Viking Link**. That cumulative context reinforces why the ExA should be cautious about over-weighting corridor-only proximity screens for "residential receptors" when the lived amenity effect is driven by construction logistics, duration and traffic management.

A.5.6 (Method transparency – the "count" is not auditable without a rule and a schedule)
The Applicant should state explicitly whether "residential properties within X metres" is determined by reference to: (i) AddressBase UPRN point coordinates; (ii) building footprints (centroid vs nearest-edge); or (iii) curtilage/extent polygons. In rural farmsteads this choice is outcome-determinative because AddressBase points can sit materially away from the dwelling. Without a stated decision rule and an address/UPRN schedule for each route, the comparator is not auditable.

This is a case in point where the applicant has only counted one residential property –


N Drove
60 m corridor
Option 1 cable route
Ruler
Line
Path
Polygon
Circle
3D path
3D polygon
Measure the distance between two points on the ground
Map Length:
350.65
Meters
Ground Length:
350.65
Heading:
121.74 degrees
Mouse Navigation
Save
Clear
N Drove
Lincs Electrical Contractors
Image © 2025 Airbus
N Drove
Banham


40
White House Farm
North Drove
Dovecote Farm
Bicker Gauntlet
Gauntlet Bridge
Gauntlet Farm
39
Longhedge Drove
Cow Bridge
Gauntlet Farm

A.5.7 (Requested ExA treatment / audit remedy)
LCJM therefore invites the ExA to place **limited weight** on the Applicant's Row-5 residential-receptor comparison unless and until the Applicant provides an auditable schedule for **both routes** which:

1. reports counts at **<350m** (to answer Table ES-1 Row 5) and, if relied upon, also reports **<300m** as a sensitivity;
2. lists the addresses/UPRNs counted and identifies any exclusions with reasons (non-residential / disused / agricultural-only), together with the distance rule used; and
3. states clearly whether construction access/haul receptor effects are excluded by definition (corridor-only) or incorporated on a like-for-like basis for both routes, so that receptors such as **The White House and Mountain Cottage** are not screened out simply because the disturbance pathway is construction traffic/access rather than the cable corridor.

A.6 Row 6 – Cultural Heritage (HER): proximity proxy, not a like-for-like effects comparator

Row	Aspect	Beacon Fen Indicative Cable Route	LCJMF's Amended Alternative	LCJMF comments	Applicant's summary comments at Deadline 7	LCJM Closing Statement comments at D8
6	Cultural Heritage – Historic Environment Farm Environment Record crossing	0 Applicant's position (unchanged from Comparative Analysis): 2 non-designated heritage assets within 100m	0 Applicant's position (unchanged from Comparative Analysis): 12 non-designated heritage assets within 100m		The Applicant's counts are derived from Lincolnshire County Council Historic Environment Record data and the Applicant continues to consider this an appropriate source for this comparison. See further **section 2.7** below.	Row 6 is a **100m proximity screen** ("HER entries within 100m"), not a 'crossing' metric; the Applicant's corridor-only count is **artificially improved** by carving out construction access/haul—yet the **proposed access track crosses MLI122003, MLI122004 and MLI122002** (and brings **MLI121999** within the 100m envelope). LCJM invites limited weight unless the Applicant discloses a **like-for-like mapped construction footprint + auditable schedule** for both routes (record type/geometry, buffer rule, and what is counted) **LCJM also relies on its SBI 107629756 SFI/HEFER Government mapping (Ex D6.19–D6.22) as additional desk-based evidence that does not indicate mapped historic/archaeological constraints along the LCJM Hybrid, supporting limited weight unless the Applicant's "crossing" claim is evidenced transparently.**

A.6.1 Row 6 is framed as a "map-metric" comparator, but the Applicant's metric is a proximity screen only (HER entries "within 100m" of an indicative corridor), with construction access/haul routes and compounds carved out into narrative; that is not a like-for-like heritage-risk comparator.

A.6.2 "Within 100m" is a blunt proxy and should not be over-weighted: a higher count does not, of itself, demonstrate a worse outcome without clarity on *what* is being counted (record type and mapped extent) and the rule applied (point/line/polygon; centroid vs edge; corridor width/boundary; intersection method), applied consistently to both corridors.

A.6.3 LCJM also relies on SBI SFI/HEFER mapping (ExD6.19–ExD6.22) as additional desk-based context; on LCJM's review, this does not show mapped historic/archaeological constraints relevant to Row 6 in the locality of the compared corridors, supporting treatment of Row 6 as screening value only.

A.6.4 Requested ExA treatment / weight: LCJM invites the ExA to place limited weight on Row 6 beyond screening unless the Applicant discloses an auditable schedule for both routes (entries counted + record geometry/extents + corridor boundary used + intersection method, and whether access/compounds are included like-for-like), and to apply that caution to any downstream alternatives or CA/TP proportionality conclusions that rely on Row 6 as a discriminator.

A.6.4 LCJM also notes that the Applicant's corridor-only HER screen is artificially 'improved' by excluding construction access/haul and compounds: the **proposed construction access track crosses HER entries MLI122003, MLI122004 and MLI122002**, and would bring **MLI121999** within the same **100m** screening envelope; accordingly, any Row-6 comparison should not be relied upon unless the Applicant discloses a like-for-like mapped construction footprint for both routes.

A.7 Row 7 - Traffic & Access: corridor-only metric, micro-siting sensitivity, and decision-safe treatment

Row	Aspect	Beacon Fen Indicative Cable Route	LCJMF's Amended Alternative	LCJMF comments	Applicant's summary comments at Deadline 7	LCJM Closing Statement comments at D8
7	Traffic & Access	**Four highway crossings:** Great Hale Drove crossed North Drove crossed	Little Hale Drove crossed only Applicant's position:		Using the LCJMF Amended Alternative route as specified in LCJMF's **REP2-051** (as specifically directed to in LCJMF's **REP4-037**), there is	Row 7 is a corridor-only "highway crossings" screen (crossings counted by the indicative cable corridor) and is not a like-for-like comparator of traffic/access effects, which are driven primarily by construction logistics (haul routes, compounds, traffic management, duration/disruption and farm access continuity). The Applicant's own response accepts that the Great Hale Drove crossing on the LCJM Hybrid could be avoided by a minor amendment, demonstrating that corridor-only crossing counts are micro-siting sensitive and should not be over-weighted as a determinative discriminator. LCJM invites the ExA to treat Row 7 as a corridor-geometry indicator (showing fewer highway crossings on the LCJM Hybrid as plotted), and to treat any wider "traffic/access" discriminator as decision-safe only if assessed on a transparent like-for-like basis that incorporates construction logistics for both routes (rather than carving those elements out into narrative).
Beacon Fen Energy Park Applicant's Response to ExQ3 NED.3.2						
		Vicarage Drove crossed	Great Hale Drove crossed but could be avoided by a further amendment to the route.		a crossing of Great Hale Drove. However, if the route were minorly amended, this crossing could be avoided.	

A.7.1 The Applicant presents Row 7 as a "highway crossings" comparator, **but it is corridor-only** (crossings counted by the indicative trench corridor). The Applicant separates construction access/haul routes and compounds into narrative. That is not a like-for-like comparator of traffic/access effects. In practice, HGV movements, temporary traffic management, severance risk, duration/disruption and farm access continuity are driven primarily by construction logistics and siting discipline, not by whether the corridor line intersects a highway on plan.

For avoidance of doubt, the 'benign access / existing track' premise is not reliable on LCJM (see Row 4/§5: the south-side access adjacent to LWS 4722 is arable land, not an existing track), reinforcing why Row 7 cannot be treated as a corridor-only traffic proxy.

A.7.2 The Applicant's ExQ3 NED.3.2 response accepts that an amendment could avoid the Great Hale Drove crossing on the LCJM Hybrid alignment, while also stating that this would not materially affect the comparison given that the Applicant's own indicative corridor already crosses multiple highways. This demonstrates that corridor-only crossing counts are sensitive to micro-siting choices and should not be over-weighted as a determinative discriminator.

A.7.3 LCJM's concern is not that the Applicant declined to "unilaterally adjust" LCJM's mapped alignment for comparison purposes; it is that the resulting corridor-only comparator risks creating a misleadingly adverse impression if treated as fixed, while the practical logistics drivers are left in narrative.

A.7.4 (Related point – watercourse/drainage crossings) The same caution applies to corridor-only watercourse/drainage "crossing counts", where short re-alignment to the narrowest feasible crossing location (c.60m within LCJM's field) can change the headline metric without changing deliverability. Corridor-only crossing counts should therefore be treated as screening/geometry indicators only unless the Applicant applies a transparent like-for-like rule that incorporates construction access/haul and crossing design assumptions on the same basis for both routes.

A.7.5 Requested ExA treatment. LCJM invites the ExA to record Row 7 as a corridor-geometry indicator (showing fewer highway crossings on the LCJM Hybrid as plotted) and to treat any wider "traffic/access" discriminator as decision-safe only if assessed on a transparent like-for-like basis incorporating construction logistics for both routes.

A.8 Row 8 – Noise & Vibration: corridor-only screening, construction separated out, and limited weight

Row	Aspect	Beacon Fen Indicative Cable Route	LCJMF's Amended Alternative	LCJMF comments	Applicant's summary comments at Deadline 7	LCJM Closing Statement comments at D8
8	Noise & Vibration <350 metres	10 Applicant's position: Adopting 'on-the-ground' information from LCJMF on non-residential properties, there are **6** residential receptors within 300m (unchanged from the Comparative Analysis).	5 Applicant's position: Adopting 'on-the-ground' information from LCJMF on non-residential properties, there are **6** residential receptors within 300m (update to the Comparative Analysis).		As per row 5 above, the Applicant has amended the counts to reflect non-residential properties identified through new information provided by LCJMF. The Applicant's counts are based on a 300m radius, which reflects the study area in **ES Chapter 10: Noise and Vibration (APP-061).** There is no justification for LCJMF's 350m radius.	Row 8 is a corridor-only proximity screen (receptors within a set radius of the indicative trench corridor) and is not a like-for-like effects comparator because the principal drivers of noise/disturbance (haul routes, construction access, compounds, traffic management and duration) are separated out into narrative. On the Applicant's updated counts (reflecting LCJM's on-the-ground clarification of non-residential properties), there are 6 residential receptors within 300m of both routes, so Row 8 does not differentiate and should attract limited weight as a discriminator in the alternatives case or in any downstream CA/TP proportionality reasoning.

A.8.1 Row 8 is presented as a noise/vibration residential-receptor comparator, but it remains a corridor-only proximity screen (receptors within a fixed radius of the indicative trench corridor), with the principal construction noise/disturbance drivers (haul routes, construction access, compounds, traffic management and duration) carved out into narrative. That is not a like-for-like effects comparator: on the Applicant's chosen corridor, the lived amenity effect is likely to be traffic-led for certain receptors (**including The White House and Mountain Cottage**) even where the trench line screen excludes them **and it ignores the obvious cumulative context that these receptors have already been exposed to Viking Link construction traffic in the recent past (c.2 years ago).**

A.8.2 On the Applicant's updated figures (based on its 300m study radius), the headline receptor count does not differentiate between routes: 6 residential receptors are identified within 300m of both corridors. Row 8 therefore cannot rationally operate as a discriminator in the alternatives case.

A.8.3 In any event, a fixed-radius corridor count is an inherently limited proxy in this rural setting because it does not capture the construction-logistics pathways that drive noise and disturbance (traffic routing, temporary traffic management, working hours/duration, compound siting and haul-road alignment). Those elements must be assessed on a consistent, like-for-like basis if Row 8 is to be relied upon beyond screening.

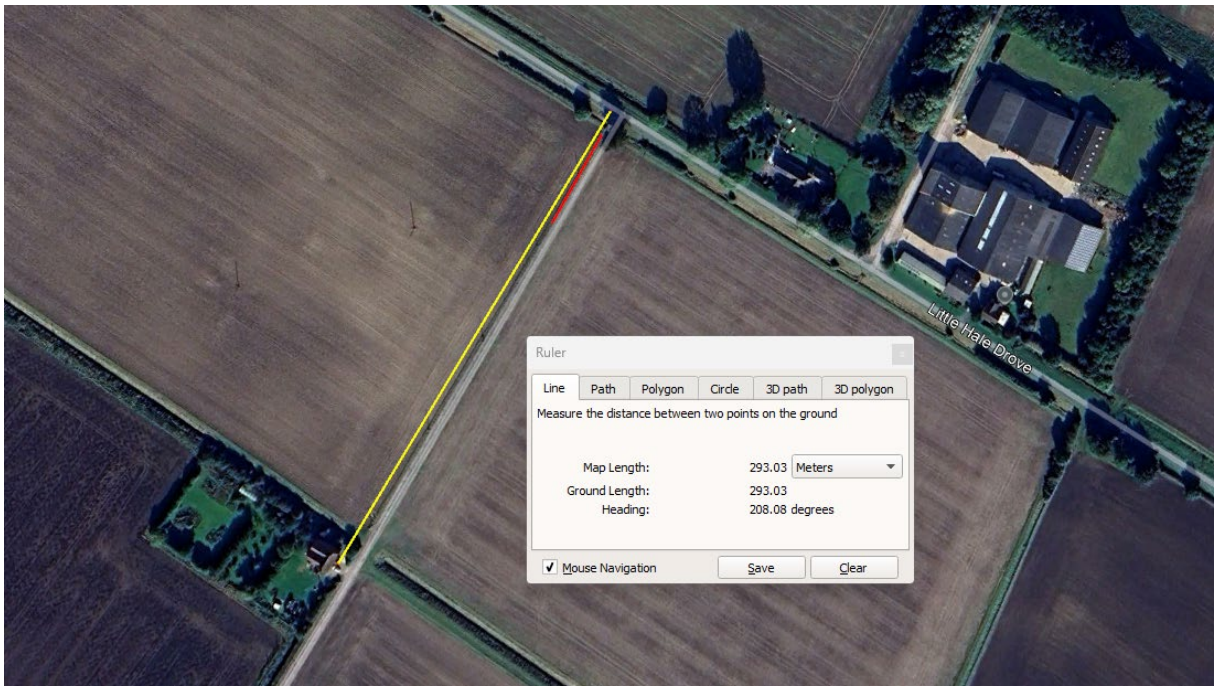
A.8.4 (Requested ExA treatment) LCJM invites the ExA to treat Row 8 as screening value only (and, on the Applicant's own updated figures, non-differentiating) unless the Applicant discloses an auditable, like-for-like construction-logistics basis for both routes.

A.9 Row 9 - Air Quality: corridor-edge counting, "273m" dispute, and construction access carved out

Row	Aspect	Beacon Fen Indicative Cable Route	LCJMF's Amended Alternative	LCJMF comments	Applicant's summary comments at Deadline 7	LCJM Closing Statement comments at D8
9	Air Quality <250 metres including construction access	7 Applicant's position: Adopting 'on-the-ground' information from LCJMF on non-residential properties, there are **4** residential receptors within 250m (unchanged from the Comparative Analysis).	5 Applicant's position: Adopting 'on-the-ground' information from LCJMF on non-residential properties, there are **6** residential receptors within 250m (update to the Comparative Analysis).		As per row 5 above, the Applicant has amended the counts to reflect non-residential properties identified through new information provided by LCJMF. Whilst both the Applicant and LCJMF adopt a 250m radius, the Applicant is unable to verify LCJMF's counts. For the avoidance of doubt, the radii used by the Applicant extend from the outer edge of the indicative corridors identified on the figures appended to the Comparative Analysis.	Row 9 is presented as "Air Quality <250m **including construction access", but the Applicant's comparison is not mapped like-for-like.** The Applicant relies on a cable corridor only-geometry proximity screen (measuring 250m from the *outer edge* of an indicative corridor) while separating the principal construction dust/air-quality drivers—haul routes, construction access arrangements, compounds and traffic management—into narrative rather than a single comparable mapped footprint for both routes. That approach is outcome-determinative and explains the dispute over receptor counts (including the "273m" point): the result depends on corridor width/edge assumptions and measurement rules, not on a consistent assessment of the construction effects that drive air-quality risk in practice. LCJM invites the ExA to treat Row 9 as screening value only and not as a determinative discriminator in route selection or CA/TP proportionality unless the Applicant applies a transparent, auditable like-for-like methodology that incorporates construction access/haul/compound assumptions on the same basis for both routes.

A.9.1 Row 9 is framed as "Air Quality <250m including construction access", but the Applicant's comparison is still a corridor-geometry proximity screen, not a like-for-like assessment of construction air-quality risk. The Applicant measures 250m from the *outer edge* of an indicative corridor, while treating haul routes, construction access, compounds and traffic management in narrative rather than as a single mapped construction footprint applied consistently to both routes. The consequence is outcome-determinative: the headline receptor count is driven by corridor-edge assumptions and measurement rules, not by a transparent comparison of the construction logistics package that drives dust/air-quality effects in practice.

A.9.2 The Applicant's "273m" critique illustrates the defect. The dwelling in Little Hale Fen (NG34 9BG) is c.293m from Little Hale Drove (i.e. the construction access), and >273m from a plausible LCJM Hybrid cable position if micro-sited towards the field edge (as would be typical good practice).



The dispute therefore turns on *what line is being measured from* (highway/access line vs indicative alignment/corridor and assumed corridor edge) and *what corridor width/geometry is assumed*, not on any decision-safe demonstration that the comparative construction air-quality effects are materially different between routes. LCJM accordingly invites the ExA to treat Row 9 as screening value only, and not as a determinative discriminator in route selection or CA/TP proportionality, unless the Applicant applies a transparent, auditable like-for-like methodology that incorporates access/haul/compound assumptions on the same basis for both routes.

A.9.3 This is particularly so because Row 9 is expressly labelled "**including construction access**", yet the access/haul and compound footprint is not mapped and applied consistently for both corridors. The practical result is a real risk of under-counting (or mischaracterising) receptors affected primarily by construction traffic and access arrangements on the Applicant's corridor where those elements sit outside the trench-corridor screen.

A.9.4 Cumulative context reinforces that caution: receptors potentially affected by construction access/haul arrangements in this locality have experienced relatively recent cumulative construction disturbance associated with the Viking Link onshore works. Corridor-only screens should not be over-weighted where real-world effects are driven by construction logistics, duration and traffic management.

A.9.5 LCJM maintains that, when construction access is treated on a like-for-like basis, the Applicant's Option 1 corridor affects 7 residential receptors (including **The White House and Mastins Cottage**), as shown below.


Poplar Farm
Last Farm
Great Hale Fen
Crow Lane Farm
CAR DYKE
White House
White House
White House
Mountain Cottage
White House
Mountain Cottage

A.10 Row 10 – Water Resources & Flood Risk: counting methodology, crossing materiality, and HDD precedent

Row	Aspect	Beacon Fen Indicative Cable Route	LCJMF's Amended Alternative	LCJMF comments	Applicant's summary comments at Deadline 7	LCJM Closing Statement comments at D8
10	Water Resources & Flood Risk	17 water crossings Applicant's position: **15** watercourse crossings (unchanged from the Comparative Analysis) 17 water crossings	16 water crossings Applicant's position: **18** watercourse crossings with a further amendment to the route (update to the Comparative Analysis) 15 water crossings	No appreciation of Anglian Water South Lincs Reservoir flood modelling (an NSIP that took away Beacon fen South)	Whilst the Applicant's counts in the Comparative Analysis were correct using the LCJMF Amended Alternative as proposed, with an amendment to the route in one area, three watercourse crossings can be avoided. Save for that point, the other assertions raised by LCJMF are refuted.	Row 10 remains an unreliable discriminator because the Applicant's "watercourse crossing count" turns on corridor geometry and desk-based proxy classification, not a transparent like-for-like rule. LCJM's review of the plotted alignments shows the LCJM Hybrid can be routed to avoid unnecessary interfaces: removing the avoidable crossings identified in LCJM's marked-up figure reduces the LCJM Hybrid to **15** crossings. Conversely, the Applicant continues to under-record crossings on its own Option 1 corridor on LCJM land; LCJM's review gives **17** crossings for Option 1. In any event, Row 10 is incomplete because it treats all crossings as equal and does not distinguish crossing *materiality* or method. The Great Hale Eau is evidenced on the Examination record as a principal watercourse **at least c.6m wide (c.1.2m deep)** and NKDC has raised concerns about this interface; it is not comparable to minor field features/ditches. Viking Link provides local precedent for **directional drilling beneath** the Great Hale Eau / LWS interface, yet the Applicant has not committed to, or explained why it need not commit to, HDD and enforceable asset-protection measures. Row 10 should therefore be treated as screening-level only and not determinative of alternatives or CA/TP proportionality.

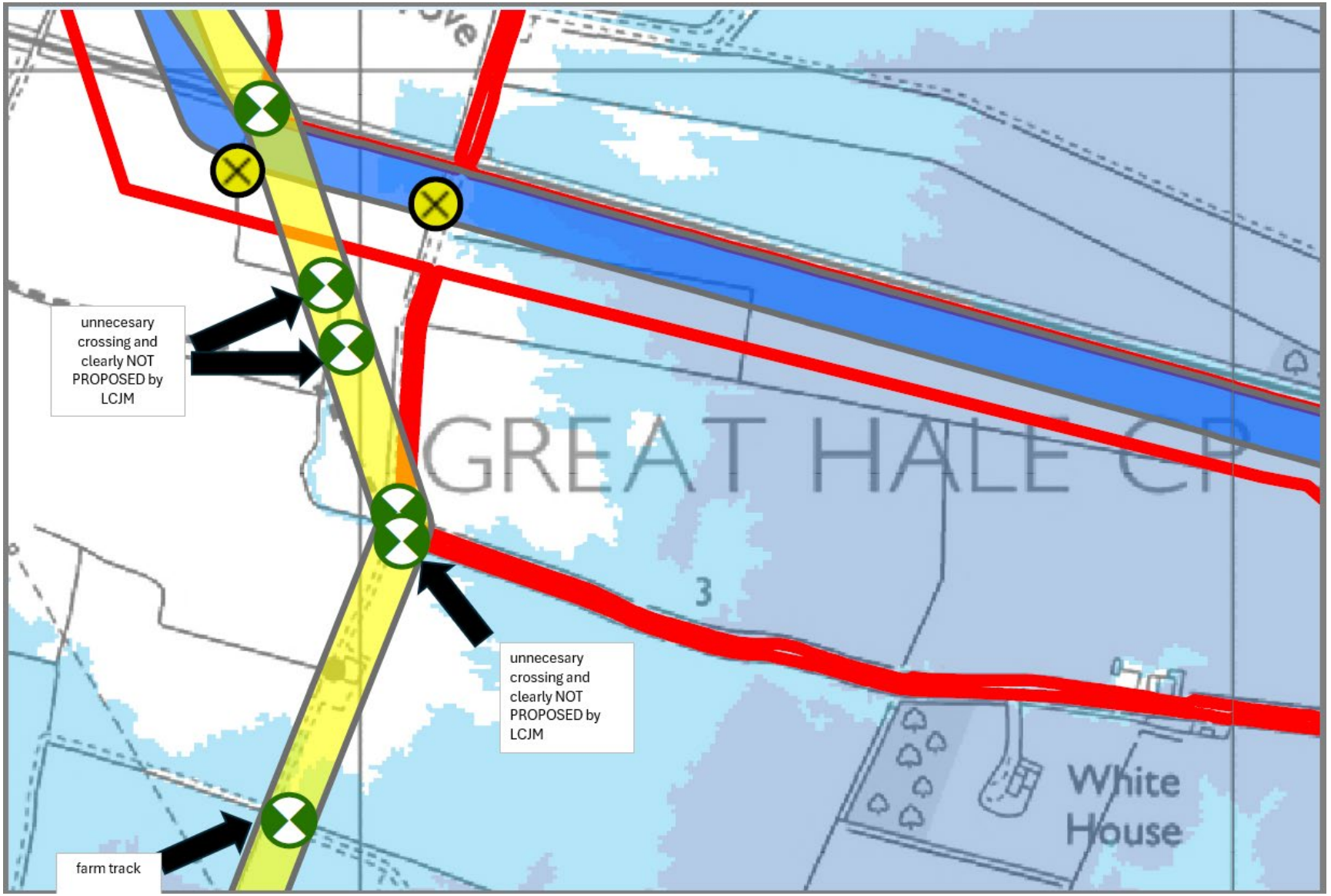
A.10.1 LCJM is concerned that the Applicant's methodology risks creating an artificially adverse impression of the LCJM Hybrid's "watercourse interfaces" while presenting the Applicant's corridor more favourably, without a transparent, like-for-like rule. Row 10 is presented as a simple "crossing count", but the Applicant has not provided a decision-safe definition of "crossing" (what is counted/excluded and why). LCJM does not accept that the Applicant's counts for the LCJM Amended Alternative are correct.

A.10.2 Micro-siting sensitivity. As shown on LCJM's marked-up figures (black arrows below), the Applicant's plotted LCJM Hybrid alignment introduces avoidable interfaces (including avoidable additional crossings and the Great Hale Drove interface).

A minor re-alignment through the narrowest feasible point within LCJM's field – as shown by the yellow dotted line in the diagram above – can reduce interfaces materially without affecting deliverability. This illustrates why headline "crossing counts" are not decision-safe discriminators if the plotted line is treated as fixed.

LCJM notes that the Applicant's plotted LCJM Hybrid linework appears to include avoidable interfaces (including additional water crossings and the Great Hale Drove interface) that are not inherent to the LCJM Hybrid corridor. This arises because the LCJM Hybrid alignment was intentionally left open/blank through LCJM's field (top left of the diagram) to reflect the flexibility to "connect into" the land blocks identified in LCJM's November 2021 (c.516 acres) and August 2023 (c.618 acres) offers.

In the absence of a defined like-for-like micro-siting rule, the plotted linework can be drawn in ways that introduce additional interfaces (including watercourse crossings and a Great Hale Drove interface) which are avoidable in practice. LCJM therefore submits that the resulting "crossing count" should carry limited weight unless and until the Applicant provides an auditable crossing schedule and applies a consistent micro-siting basis to both routes.

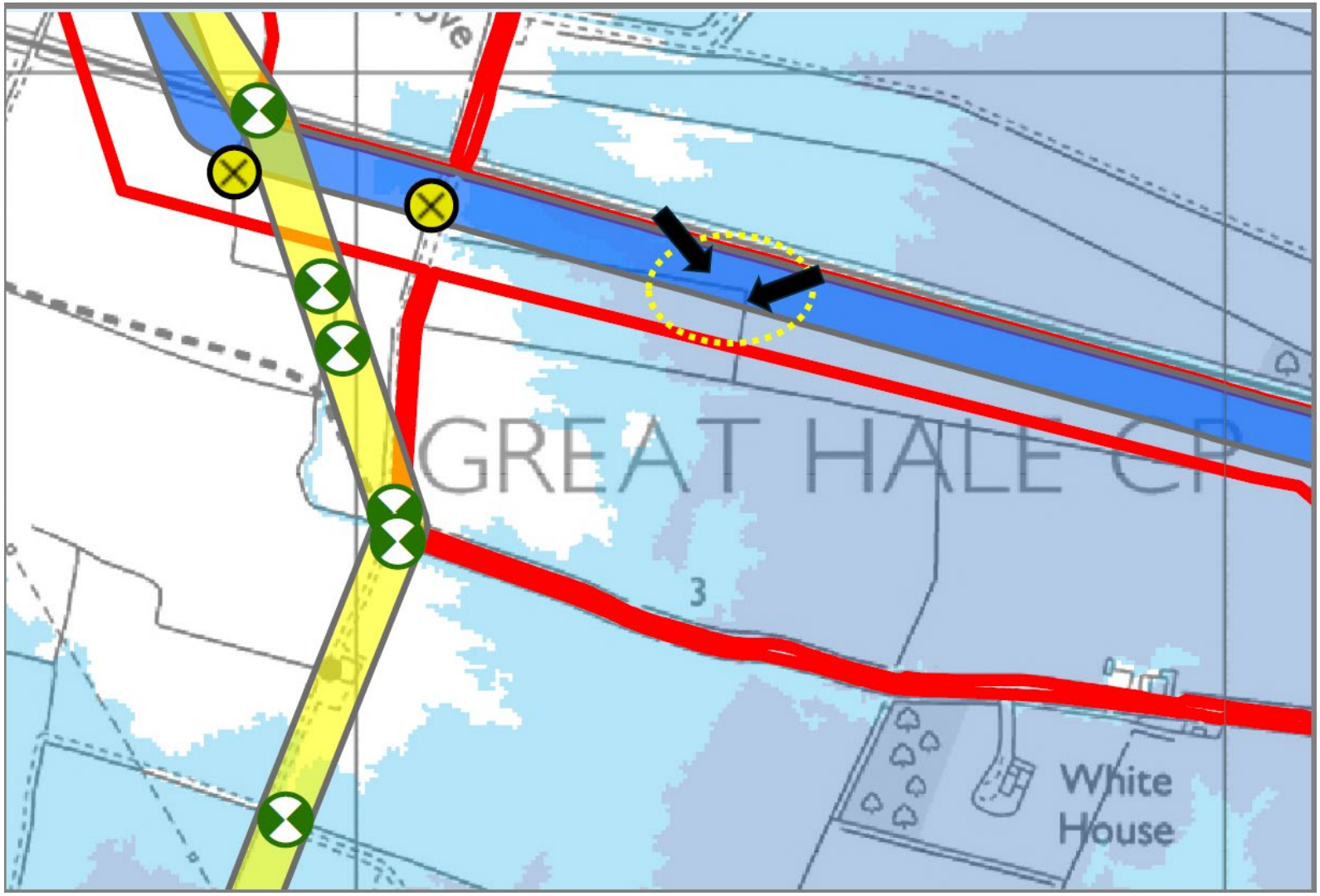

unnecesary crossing and clearly NOT PROPOSED by LCJM
GREAT HALE CP
3
unnecesary crossing and clearly NOT PROPOSED by LCJM
White House
farm track

A.10.3 Corrected count (minimum correction). Starting from the Applicant's original plotted LCJM Hybrid total (21), removing the four avoidable interfaces identified by the black arrows in the diagram above (including a farm track marked as a water crossing), LCJM reduces the LCJM Hybrid total to **17** crossings (not 18). Below also shows a field margin on our farm (not water crossing).

A.10.4 LCJM also takes issue with counting this water crossing the east side of the South Forty Foot for reasons shown below -

That is **six crossings incorrectly identified** which results in **15 water crossings** for the LCJM Hybrid route.

A.10.5 Applicant under-count on LCJM land. LCJM also maintains that the Applicant has missed (and continues to miss) watercourse crossings on the Applicant's own corridor on LCJM's land, as shown on LCJM's marked-up figures (black arrows). On LCJM's review, this results in **17** crossings for the Applicant's Option 1 corridor. The Applicant has not provided an auditable mapping output identifying which features it counted/excluded and why.



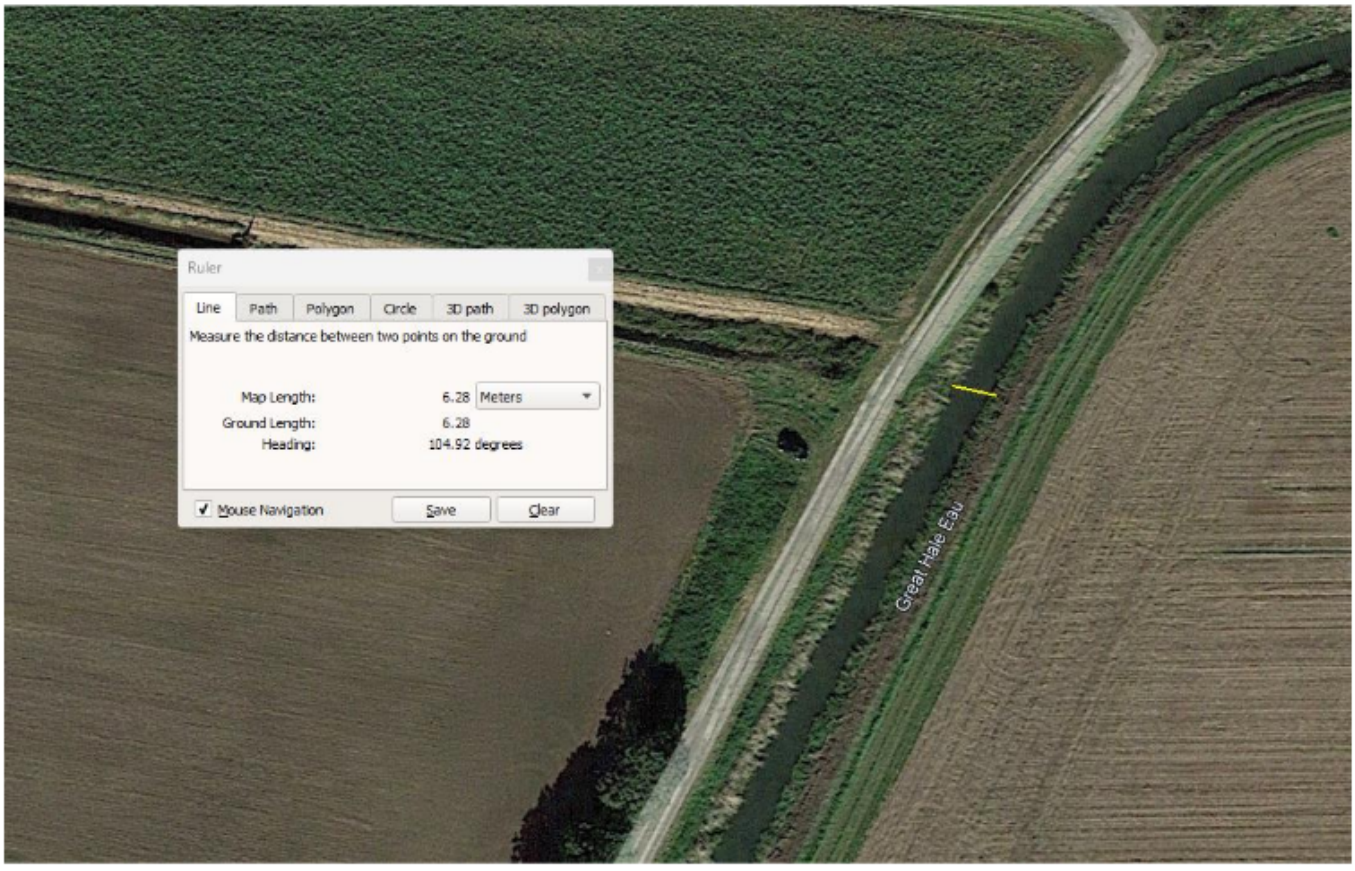
This makes 17 crossings for the Option 1 route and 15 for the LCJM Hybrid route.

A.10.6 Great Hale Eau – scale, classification, NKDC corroboration, and crossing method

Row 10 is incomplete and potentially misleading because it treats all "watercourse crossings" as equivalent and does not distinguish *scale, sensitivity, or crossing method*. This is material at the **Great Hale Eau**, which is not a minor field ditch. The Examination record identifies the Great Hale Eau as a watercourse **at least c.6m wide** (with evidence also indicating **c.1.2m depth**) and Google Earth measurement aligns with that order of magnitude (c.6.28m across the watercourse, subject to marginal vegetation). In that context, attempts to characterise the Great Hale Eau as a "ditch" for the purposes of a simplified crossings metric are not reliable; the metric cannot be treated as decision-safe unless watercourses have been consistently and correctly classified.

LCJM also notes that **North Kesteven District Council**, in its responses during Examination (including in response to ExQ3), raised specific concerns about the Great Hale Eau interface, reinforcing that this is a materially significant water feature in its own right rather than a trivial "crossing" to be counted in the same way as a field boundary feature.

- Paragraph 2.5.10 seeks to make a case that the Great Hale Eau is a ditch rather than another type of watercourse. This is not agreed as it is not demonstrated that the watercourse (including just the short section coinciding with the Site) meets the standard definition of a ditch. Further, the statement that the watercourse is less than 5m wide is not evidenced and is directly contradicted by the information and evidence presented in REP5-015 and REP5-029 which identify a watercourse 6m wide and 1.2m deep. Further, review of Google Earth (see below) aligns with the statements in these later documents that the watercourse is at least 6m wide (it may be wider after considering marginal stands of emergent in-channel vegetation that obscure the water line). The Metric cannot be agreed until it is evidenced that all watercourses have been correctly classified within the metric.



The Applicant's Row 10 methodology (headline crossing counts derived from desk-based proxies and corridor geometry) does not engage with that significance.

Given the scale and sensitivity of the Great Hale Eau, the comparator also needs to address *crossing method* (open-cut versus HDD) and enforceable controls. Local precedent demonstrates feasibility of avoiding direct disturbance: Viking Link provides a nearby example of **directional drilling beneath** the Great Hale Eau / LWS interface. The Applicant has not committed to, or explained why it need not commit to, an HDD approach at the Great Hale Eau, nor has it set out enforceable protections for LCJM's licensed abstraction assets and irrigation resilience in this locality. Accordingly, Row 10 should not be relied upon as a determinative discriminator in route selection or CA/TP proportionality absent transparent classification, method commitments, and enforceable protections.

Row 10 should distinguish crossing **method** and **asset sensitivity** (open-cut vs HDD vs structure works), because a simple count cannot reflect materially different flood/drainage and environmental risks; the Great Hale Eau is the clearest example.

A.11 Row 11 – Soils & Agricultural Land: desk-based ALC, field-scale heterogeneity, and non-decision-safe discrimination

Row	Aspect	Beacon Fen Indicative Cable Route	LCJMF's Amended Alternative	LCJMF comments	Applicant's summary comments at Deadline 7	LCJM Closing Statement comments at D8
11	Soils & Agricultural land	Passes through majority Grade 2 potato land Applicant's position (unchanged from Comparative Analysis): 2.21km of route on Grade 1 land 4.66km of route on Grade 2 land Route is wholly on BMV land	Grade 3 a and b – as evidenced by AGR3 ALC land classification in 2021 AND 3 generations of farming by LCJM Applicant's position (unchanged from Comparative Analysis): 6.93km of route on Grade 2 land Route is wholly on BMV land	ALC consultant to be appointed	LCJMF does not engage with the Applicant's comments on the relevance of the AGR3 survey data. The Applicant maintains its position that using the provisional ALC data is the best means of ensuring a fair comparison of the routes as a whole.	Row 11 is not decision-safe as a "BMV / ALC" discriminator because it relies on convenient, provisional desktop ALC and declines basic ground-truthing despite LCJM having offered (since the Nov-21 / Aug-23 land offers and subsequent engagement) clear, rapid evidence of land capability at field scale (rotation history, potato/onion/beet presence, irrigation infrastructure/hydrants, and farm records). ALC is heterogeneous even between adjacent fields; a 3.2km corridor cannot be fairly characterised by a single desk grade without route-specific survey or at least structured verification with the land manager. The Applicant's 'if you assume lower grade here you must assume it there' framing is reductive: it is not a like-for-like correction, it is an argument for maintaining an untested baseline. LCJM relies on the AGR3 ALC survey context (c.96% Grade 3a) as corroboration of what was explained in meetings chaired by Ed Blundy (CAAV) from June 2021 to November 2021 and in emails involving the LCJM Aug 23 offer, and submits that the ExA should treat Row 11 as screening-level only unless route-specific, auditable ALC evidence is produced for the corridors actually relied upon. Even on the Applicant's own desktop ALC map (APP-054 / APP-277 Annex D), the LCJM Hybrid alignment runs outside the main Grade 1 block; Row 11 therefore cannot rationally be used to down-score the LCJM Hybrid on BMV impact. See ExD4.9b. **Scale / proportionality:** The ALC point is not academic for LCJM. The indicative corridor runs for c.3.2 km through LCJM's holding, so ALC becomes a materially weighty discriminator for a very large quantum of affected land. In those circumstances, reliance on desk ALC alone (without proportionate ground-truthing with the land manager, crop/rotation evidence, and known irrigated capability) is not decision-safe.

A.11.1 Row 11 is advanced as a "BMV land" discriminator, but the Applicant's approach remains desk-led: it relies on Natural England's **provisional** ALC mapping as a corridor comparator while declining proportionate ground-truthing (potato rotations, irrigation mains, irrigation hydrants, crop histories) that was readily available from LCJM as the land manager.

A.11.2 This is not a minor methodological point. **ALC varies materially at field scale** even within the same holding and between adjacent parcels. Crop rotation history and cropping capability (e.g. routine potatoes / onion / sugar beet ground versus more constrained land (e.g. cereal/temporary grass rotations) can demonstrate that variability quickly; it is also evidenced by irrigation infrastructure and operating decisions (e.g. presence/absence of mains/hydrants and the pattern of irrigation investment).

A.11.3 LCJM has been on notice to the Applicant since at least the Nov-21 and Aug-23 land engagement that land quality on the LCJM holding is not uniform and that **the corridor-level characterization requires field-level evidence**. The Applicant did not request crop rotation records, did not undertake structured verification with LCJM, and did not carry out (or disclose) route-specific ALC survey work for the corridors it relies upon.

A.11.4 The Applicant's "symmetry" rebuttal ("if you assume lower quality here you must assume it there") is over-simplified. It does not correct an uncertainty; it **preserves** an untested baseline by asserting that any attempt to improve accuracy would necessarily dilute the comparison. That is not a decision-safe basis for treating one route as "wholly BMV" versus another.

A.11.5 LCJM relies on the AGR3 ALC survey context (reported as c.96% Grade 3a) as corroboration of what LCJM explained during land interest engagement (including meetings chaired by Ed Blundy (CAAV)) from June 2021 to November 2021 relating to the LCJM Nov 21 516 acre PV + BESS offer and in subsequent written correspondence: there is **credible, evidenced reason** to doubt the provisional Grade-2 characterisation being applied to the LCJM Hybrid corridor at this location, and the Applicant has not transparently stress-tested that with route-specific evidence.

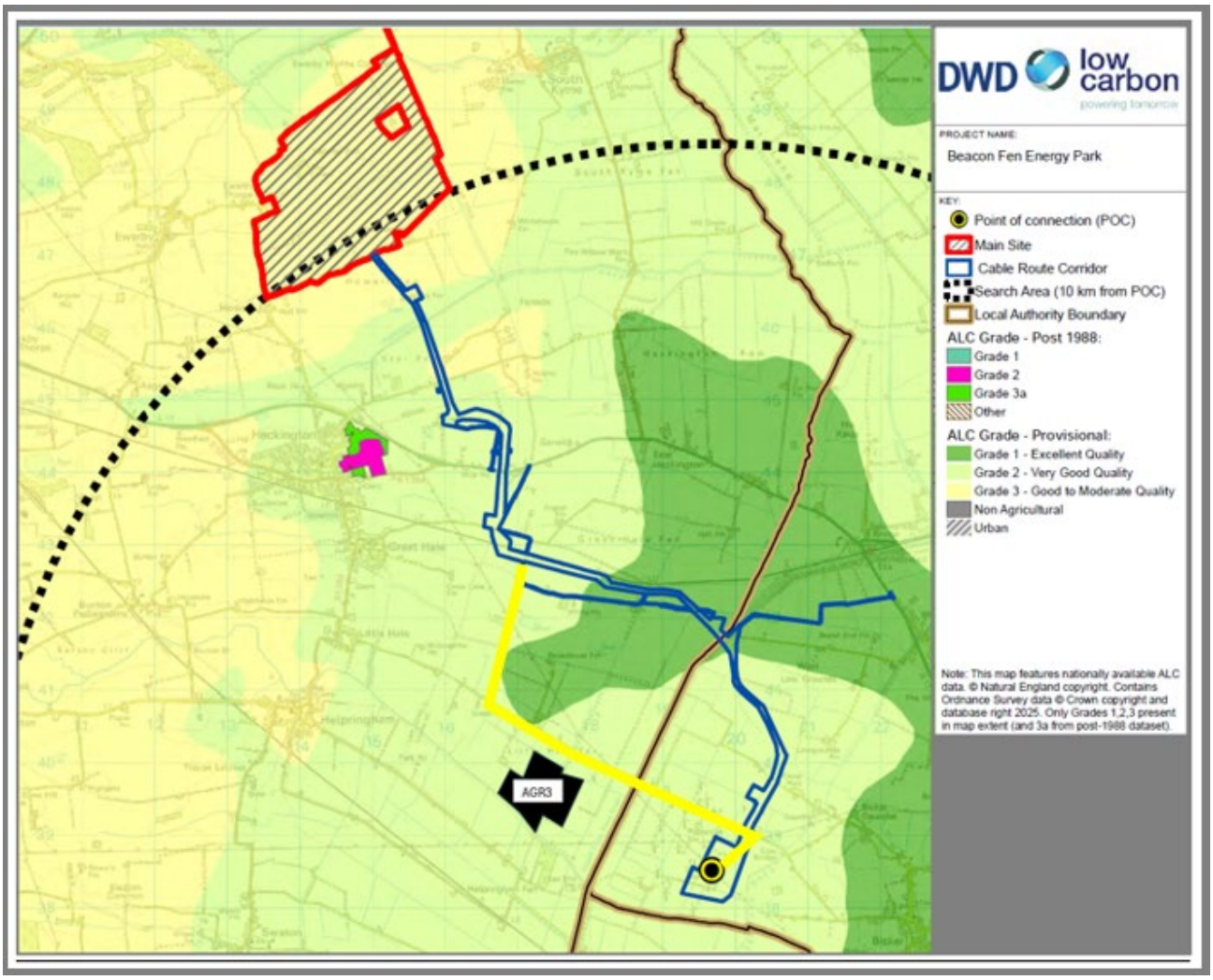
A.11.5.a Contemporaneous land-manager evidence / engagement context. LCJM also relies on its Aug-23 engagement correspondence (ExD8.1–ExD8.2) as contemporaneous evidence that the Applicant was expressly informed that the key Little Hale Fen land block being offered/picked-up was understood and presented by LCJM as **predominantly Grade 3**. That evidence is not advanced as a substitute for route-specific ALC survey, but it is relevant corroboration that (i) LCJM put land capability/grade in issue during optioneering, and (ii) proportionate ground-truthing with the land manager (crop/rotation and irrigation capability evidence) was readily available but not taken up.

A.11.6 Requested ExA treatment. LCJM invites the ExA to treat Row 11 as **screening-level only** unless the Applicant produces route-specific, auditable ALC evidence for the **corridors actually relied upon** (or, at minimum, explains transparently why proportionate verification with the land manager was not undertaken and how that omission is not outcome-determinative).

A.11.7 Applicant's own ALC mapping does not support the claimed direction of effect.
Even if (contrary to LCJM's position) the ExA were to place weight on the Applicant's desktop ALC mapping as the baseline comparator, the Applicant's own mapping (APP-054 Appendix 2 / Planning Statement APP-277 Appendix 2, Annex D) shows that the LCJM Hybrid alignment runs **outside** the principal **Grade 1** block shown on the Applicant's plan, whereas the Applicant's indicative corridor passes through / adjacent to that Grade 1 zone. LCJM therefore submits that, on the Applicant's own preferred dataset, Row 11 cannot be relied upon to characterise the LCJM Hybrid route as the "worse" BMV outcome, and it should not be used as a determinative discriminator in the

“alternatives” narrative or in any downstream CA/TP proportionality reasoning. LCJM relies on ExD4.9b (Applicant ALC map with LCJM overlays, including AGR3 Grade 3a field-survey context) to demonstrate this point.

Even on the Applicant’s ALC map, the LCJM Hybrid avoids the Grade 1 block; the Applicant’s route does not.



A.11.8 The Applicant’s “no overlap” response is beside the point. LCJM does not assert that the AGR3 ALC survey *defines* the corridor grade; it is relied upon as **corroborative, local ground-truth** supporting what LCJM told the Applicant repeatedly during the Nov-21 and Aug-23 PV+BESS offers (ExD8.1 and ExD8.2): that the relevant land blocks within LCJM’s holding are predominantly Grade 3 (as evidenced in practice by long-term rotations, irrigated cropping capability and fixed irrigation infrastructure). The Applicant chose not to undertake proportionate engagement/verification (e.g. crop history, irrigated capability, site walkover) and instead relies on desk ALC as a discriminator. In a landscape where field-to-field variation is well-known, that approach is **over-reductive** and should attract limited weight where ALC is used to discount alternatives or justify CA/TP scope.

A.11.9 Scale matters. LCJM is not raising ALC as a “nice to have”. The Applicant’s indicative cable corridor runs for c.3.2 km through LCJM’s holding, creating a concentrated and disproportionate exposure to temporary and (in places) permanent land-take/sterilisation risk compared with many individual crossings elsewhere. Where the Applicant is relying on ALC as part of the “alternatives” narrative (and implicitly to justify CA/TP proportionality), a desk-based provisional layer is not an adequate evidential foundation for this scale of impact. A proportionate approach would have been to verify land quality and capability with the land manager using readily available evidence (rotation history, irrigated cropping capability, fixed irrigation infrastructure) rather than treating ALC as a convenient desktop discriminator and then dismissing local ground-truth because survey polygons do not precisely overlap the corridor line.

Final Table ES-1

Updated Table ES-1 following the applicant's D7 responses

Row	Aspect	BEACON FEN INDICATIVE CABLE ROUTE	LCJMF'S AMENDED ALTERNATIVE	D8 Closing Comments
1	Total Corridor Length	**6,870 metres (applicant's own measurement)**	***6,786 metres**	The LCJM Hybrid is shorter than the Option 1 route. *The LCJM is even shorter when cutting across John Cope's land LL431295 (which LCJM also farms). The Applicant's "cannot replicate" statement amounts to an assertion rather than a verifiable comparator. A generic description of software/tool and coordinate system does not resolve a measurement dispute.
2	East-West Field Crossing	All fields across LCJM land in Great Hale Fen in the west to east pathway will cross north / south land drains every 21 yards	No LCJM fields will have land drainage cut due to north south passage alongside north south drainage (parrallel existence)	**Row 2 is not a neutral 'map-metric' in drained fenland.** On LCJM Grade 2 land, east–west bisection is effectively a **proxy for repeated interfaces with dense north–south land drains (c. every 21 yards)**, with consequences for integrity, reinstatement, jetting access and long-term performance. LCJM cannot evidence neighbouring private drainage layouts.
3	Number of affected landowners (if landowner is affected by both routes it is excluded - see row 3c below)	10	3	(Core 12 matrix Row 8a) - deduplicated owner count (each beneficial freehold owner counted once).
3a	Names	John Cope LL286255, LCJM, Mountain SSAS, Environment Agency, Shirley Pugh, Richard Booth, Bicker United Charity, Andrew and Timothy Booth, Firth, The Vicarage Drove Project	Needham, Nickols, Slater	
3b	Notes		3 **new** landowners introduced by LCJM Hybrid and 10 Beacon Fen landowners dropped	**Reduction** of 7 affceted landowners by using LCJM Hybrid route
3c	Landowners affected by **both routes** and excluded from 3a	Percy Needham Trust, IDB Blacksluice, Jonny Grant (Donington), Ann Firth and Sarah Jane Bettinson,		

Updated Table ES-1 following the applicant's D7 responses

Row	Aspect	BEACON FEN INDICATIVE CABLE ROUTE	LCJMF'S AMENDED ALTERNATIVE	D8 Closing Comments
4	Ecology - Local Wildlife Site **occupation**	1,650 metres of LWS 4722 - both the north and south side (and already affected in 2023 by Viking Link - i.e. cumulative impact	0 metres	Row 4 is a **metres-based comparator of LWS occupation/longitudinal interaction** (not "LWS crossings"): the Applicant corridor entails **c.1,650m** of longitudinal interaction with **LWS 4722** (including "double occupation" in places) whereas the **LCJM Hybrid is 0m**; any attempt to rebut this by substituting assumption-led haul road/compound/access alignments is not like-for-like and should carry limited weight unless the Applicant provides an auditable, consistently defined construction-logistics schedule for both routes (geometry, corridor width, start/end points, measurement basis and objective viability constraints).
5	Landscape & Visual - residential properties < 350 metres	10	6	Row 5 is being artificially 'improved' by the Applicant by stripping construction access/haul and compounds out of the residential count: that approach excludes The White House and Mountain Cottage on the chosen route (where the lived Landscape and Visual /amenity effect is traffic-led), and ignores the obvious cumulative context — **ALL** the receptors on the Option 1 chsoen route were already subjected to Viking Link construction traffic c.2 years ago. Row 5 is a <350m residential proximity comparator, yet the Applicant substitutes a <300m AddressBase count and corridor-only screening (carving out access/haul effects); unless it discloses an auditable <350m schedule (rule + addresses/UPRNs) for both routes, the residential-receptor comparison is not decision-safe.
6	Cultural Heritage - Historic Environment Farm Environment Record crossing	0	0	**Row 6 is a 100m proximity screen, not a 'crossing' comparator;** the Applicant's corridor-only count is **artificially improved** by stripping out construction access/haul (which crosses **MLI122003/004/002** and brings **MLI121999** within 100m), so the metric is **not decision-safe** absent an **auditable like-for-like schedule** for both routes. LCJM also relies on HEFER mapping (ExD6.19–ExD6.22) as a corroborative desk-based check, which does not indicate mapped heritage constraints along the relevant sections of either corridor; accordingly Row 6 should be treated as screening value only unless the Applicant discloses an auditable GIS schedule (rule + records + construction footprint) for both routes.

Updated Table ES-1 following the applicant's D7 responses

Row	Aspect	BEACON FEN INDICATIVE CABLE ROUTE	LCJMF'S AMENDED ALTERNATIVE	D8 Closing Comments
7	Traffic & Access	**Four highway crossings:** Great Hale Drove crossed North Drove crossed Bicker Drove crossed Vicarage Drove crossed	Little Hale Drove crossed only	Row 7 is a corridor-only 'highway crossings' screen (counted from the indicative trench line) and is not a like-for-like comparator of traffic/access effects, which are driven primarily by construction logistics (haul routes, compounds, traffic management and duration). **LCJM is disappointed to have had to re-orientate the LCJM Hybrid away from Great Hale Drove solely to prevent a corridor-only metric being used to create an artificially adverse 'highway crossing' impression; that approach is methodologically unfair and not decision-safe.** The Applicant's own response accepts the Great Hale Drove crossing could be avoided by minor micro-siting, demonstrating the sensitivity of corridor-crossing counts; LCJM invites the ExA to treat Row 7 as a geometry indicator only unless the Applicant discloses an auditable, like-for-like construction-logistics basis for both routes.
8	Noise & Vibration < 350 metres	10	5	Row 8 is a corridor-only proximity screen, and on the Applicant's updated counts it does not differentiate (6 receptors within 300m on both routes); it should carry limited weight—particularly given recent cumulative Viking Link construction traffic affecting the same receptors—unless the Applicant applies an auditable, like-for-like construction-logistics basis (access/haul/compounds/TTM/duration) to both corridors.
9	Air Quality < 250 metres including construction access	7	5	Row 9 is a cable only corridor-edge proximity screen rather than a like-for-like "including construction access" comparator: the 250m buffer is taken from the indicative corridor outer edge while access/haul/compounds/traffic management are treated separately, so outcomes (including the "273m" point) depend on geometry/measurement assumptions rather than a single auditable construction-footprint applied consistently to both routes.
10	Water Resources & Flood Risk	17 water crossings	15 water crossings	Row 10 is not decision-safe: the Applicant's plotted LCJM Hybrid alignment appears to add avoidable 'water crossings' (including a farm track and a field boundary/margin mapped as crossings), so the headline totals should carry limited weight unless supported by an auditable, like-for-like crossings schedule (feature classification + intersection points) for both routes. Further, Row 10 is a corridor-geometry count only: it does not capture the principal construction risk pathways (haul routes, access siting, compounds, working duration and method), which are separated into narrative and may drive materially different real-world effects.
11	Soils & Agricultural land	2.21 km of route on Grade 1 land 4.66 lm of route on Grade 2 land (applicant's comments)	Grade 3 a and b - as evidenced by AGR3 ALC land classification in 2021 AND 3 generations of farming by LCJM. **This was explained clearly since July 2021 in the build up to the LCJM Nov 21 offer and again on emails during the LCJM Aug 23 offer - see ExD8.1 and ExD8.2**	Row 11 relies on provisional desktop ALC and is not decision-safe as a discriminator without route-specific/land-manager verification; on the Applicant's own ALC plan the LCJM Hybrid sits outside the main Grade 1 block while the Applicant's corridor does not, so Row 11 should carry limited weight (see ExD4.9b).

A.12 LCJM Appendix Conclusion

The Applicant's reliance on paragraph 1.2.8 ("policy would not require an alternative route") does not answer LCJM's point: where the comparative exercise is not robust and auditable on the Examination record, it cannot be used to discount alternatives or to carry the weight placed on it in support of CA/TP.

LCJM's relief is practical and programme-neutral: a voluntary agreement on agreed terms (including consideration) in return for enforceable corridor discipline (mapped access/haul, joint-bay siting limits, reinstatement assurance and audit-grade as-built records), supported by enforceable corridor-discipline controls that de-risk delivery and reduce reliance on CA/TP.

These are the same matters typically addressed post-consent through Requirements, protective provisions, Statements of Common Ground and side agreements; LCJM's submission is that agreeing them now by private treaty is programme-neutral and reduces reliance on CA/TP.

A.12.1 The Applicant's "no change to conclusions" position is not decision-safe. The comparative case continues to rely on headline GIS outputs and corridor-only screens, without providing the minimum audit trail needed for the ExA to verify the claimed discriminators (route linework, corridor polygon, datasets, decision rules and measurement settings). Where a comparator cannot be independently reproduced, it should not be treated as determinative.

A.12.2 The Applicant's approach is not internally stable. Route length is relied upon as a driver (including climate framing) but is later treated as "not distinguishing" once challenged; LWS effects are relied upon to discount alternatives while prolonged longitudinal interaction / "double occupation" on the chosen corridor is accepted via assumption-led access; and "water crossings" are advanced as a headline count despite the counting method overstates interfaces on the LCJM Hybrid by including non-water features (e.g. farm track / field boundary) and by treating indicative corridor geometry as if it were the construction footprint.

A.12.3 The ExA is not being asked to "adopt LCJM's route". LCJM's submission is that, on the record as it stands, the Applicant has not established a robust, auditable basis for discounting the LCJM Hybrid within its "alternatives" narrative. In those circumstances, the ExA should give limited weight to Table ES-1 "map-metric" discriminators where they are (i) non-reproducible, (ii) corridor-only, and/or (iii) dependent on untested construction-logistics assumptions.

A.12.4 The downstream consequence is proportionality. Where the comparative case is not decision-safe, it cannot carry the weight the Applicant seeks to place on it to justify the necessity and proportionality of CA/TP and permanent rights across a c.3.2 km bisecting corridor on a single holding.

A programme-neutral private treaty solution remains available; CA/TP should therefore be treated as a last resort, and any conclusion on necessity/proportionality should proceed on an audited, enforceable understanding of the corridor's real-world behaviour (access/haul, joint bay discipline, working width, drainage interfaces, and reinstatement assurance).

LCJM therefore invites the ExA to place limited weight on the Applicant's comparative conclusions insofar as they are relied upon to justify CA/TP, unless and until the minimum audit trail and enforceable corridor-discipline controls are identified and secured.

LCJM thanks the Examining Authority for its consideration of these submissions and the Examination record.