

Beacon Fen Energy Park – Development Consent Order

Application reference: EN01051

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

On behalf of: LCJ Mountain Farms Ltd and, if permitted, Leslie Christopher John Mountain and Patricia Lynne Mountain – (F5A76C031)

Document: Supplementary Exhibits (ExD4.1 to ExD4.13) – Response to ISH3

Deadline: Deadline 4 (D4) – 21 November 2025

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Purpose

This Supplementary Exhibits Volume accompanies LCJMF's Deadline 4 submission, "Response to ISH3 (Agenda Item 4 – Land Use; Agenda Item 6 – Cumulative Effects): clarification of engagement record, ALC evidence and cumulative risk".

It brings together, in one place, the key documents and technical materials relied upon in that note, including:

- LCJMF's internal time-recording spreadsheet evidencing the burden on the farm business;
- correspondence between LCJMF (and its advisers) and the Applicant / Ardent;
- contemporaneous Agricultural Land Classification (ALC) evidence;
- Transmission Entry Capacity (TEC) Register extracts for Bicker Fen 400 kV; and
- field-level evidence of cumulative soil and drainage effects at Starvalls Field, where the Viking Link corridor is now proposed to be crossed again by the Beacon Fen cable route.

The exhibits are provided to assist the Examining Authority in verifying the factual points made in LCJMF's Deadline 4 submission.

Structure

- **Page 2:** Supplementary Exhibits Index (table of contents for ExD4.1 to ExD4.13)
- **Pages 3–xx:** Exhibits ExD4.1 to ExD4.13 in numerical order

Each exhibit should begin on a new page and be clearly labelled with its exhibit number and title.

Important

This volume contains **evidence only**. All commentary, interpretation and argumentation are set out in LCJMF's Deadline 4 submission. The exhibits should be read alongside the relevant references in that document.

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Exhibit ExD4.1

LCJMF Internal log of time spent on the Low Carbon Beacon Fen project from 08.05.223 to 07.02.25. Yellows rows show 420 minutes of failed attempts at meetings when the Option 1 cable route was announced.

Date from 18.05.23	Start - Sydney Time	Finish	Description	Org	Personnel	Type	Duration - minutes				Time Accrued - minutes	Response
							Matt Mountain	John Mountain	Lynne Mountain	Andy Fox - Farm Manager		
18.05.23	01.15	01.25	Email asking why Alex Milne (Ardent) is writing to us	Ardent	Alex Milne	Email	10	5	5		20	
05.08.23	01.20	01.35	Email asking why Sean Collins is writing to us	Ardent	Sean Collins	Email	15				0	
05.08.23	01.20	01.25	Email asking Ed Blundy to represent us	Brown and Co	Ed Blundy	Email	5	5	5		15	
04.08.23	02.23	02.43	Email from Ed explaining procedure of s172 powers	Brown and Co	Ed Blundy	Email	15	15	15		45	
05.08.23	02.24	02.30	response to Ed Blundy about other EA + LOA interrelated issues here	Brown and Co	Ed Blundy	Email	5				5	
15.08.23	17.05	17.35	Email to James Turley about DCO attempt	Low Carbon	James	Email	30	5	5		40	No
18.08.23			Phone call to James Turley - unanswered	Low Carbon	James	Teleph	5				5	No
18.08.23			Phone call to James Turley - unanswered	Low Carbon	James	Teleph	5				5	No
18.08.23			Phone call to Sean Collins - unanswered	Ardent	Sean Collins	Teleph	5				5	No
18.08.23			Phone call to Alex Milne - unanswered	Ardent	Alex Milne	Teleph	5				5	No
18.08.23	19.24	19.54	In light of no one answering their phones - email to James Turley, Sean Collins and Alex Milne asking cabling route questions - no answer	Low Carbon	Turley	Email	30	30	30		90	No
18.08.23			Phone call to Low Carbon Front Desk in London - left message for James Turley - no response	Low Carbon	James	Teleph	5				5	No
18.08.23			Phone call to Sean Collins mobile [REDACTED] no answer - left message but call not returned	Ardent	Sean Collins	Teleph	5				5	No
18.08.23	20.30		Email back from James Turley saying reference team will look at our preferred cabling route	Low Carbon	James	Email	5	5	5		15	
18.08.23	20.35		Email to James Turley asking if private wire - no response	Low Carbon	James	Email	5				5	No
19.08.23	02.10		Email to James Turley, Sean Collins-Jones, Jessica Gough, James Hartley-Bond asking for a response - no response	Low Carbon	Turley	Email	5				5	No
19.08.23	18.14		Email from Ed Blundy explaining that these wires / cables are private wire and not like NGVL	Brown and Co	Ed Blundy	Email	5	5	5		15	
22.08.23	09.31		Email from James Turley saying that he will respond to my questions as soon as they can - my questions remain unanswered	Low Carbon	Turley	Email	5	5	5		15	
22.08.23	20.06		Email complaining about the community wide summer newsletter - the point at which we found out our whole farm would be cabled through with a 30 metre working corridor and a 15 m permanent easement (registering over 3,000 metres) and how no one from the project had coe to talk to us face to face or even answered our many questions	Low Carbon	James Turley	Email	50	10	10		70	No
22.08.23	21.04		Email to Mishcons	Mishcons		Email	25	25	25		75	
22.08.23	15.5		Email from Sean Collins asking about land that is for sale by private treaty in Little Hale Fen	Ardent	Sean Collins	Email	5				5	
22.08.23	02.53		Email response to Sean Collins embedding sale particulars	Ardent	Sean Collins	Email	10				10	
24.08.23	16.05		Email to Mishcons	Mishcons		Email	10	10	10		30	
28.08.23	16.04		Email to James Turley and his team saying that I was leaving the country 28.09.23 and we would appreciate a face to face conversation - no response	Low Carbon	Turley	Email	20	20	20		60	No
28.08.23	16.54		Email to James Turley and his team asking for the position of the BESS and querying the summer 2024 DCO application in the Beacon Fen Summer Newsletter - no response	Low Carbon	James Turley	Email	20	20	20		60	No
30.08.23	17.44		Email from Ed Blundy saying he had spoken to James Turley and explained that they are looking to fall back on DC powers. JT asked if AGR 50 Mw was in the public domain. Ed Blundy said it wasn't his place to say anything here. Ed confirmed that he will be our agent and act for us with Ardent.	Brown and Co	Ed Blundy	Email	20	20	20		60	
30.08.23	18.01		MM email back to explaining our position	Brown and Co	Ed Blundy	Email	10	10	10		30	
30.08.23	18.13		EB asking for LC newsletter and mapping of proposed cable route	Brown and Co	Ed Blundy	Email	5				5	
30.08.23	04.02		Emails about working corridor widths, permanent easement widths neutering all other development opportunities	Brown and Co	Ed Blundy	Email	40	40	40		120	
31.08.23	15.13		Emails asking why cant go down Little Hale Fen Road, and further why cant they T into the 400 kv line where they are 500 metres away in Ewerby, also AGR's planning documents specifically acknowledging that they looked for sites < 4 km from Bicker 400kv substation so this would neuter any future development plans and compensation discussed would be tiny compared to the opportunity cost	Brown and Co	Ed Blundy	Email	40	40	40		120	

31.08.23			Family meeting about our response		Lynne Mountain +	meeting	60	60	60		180	
13.09.23			Phone call to Ian Cuncliffe who couldn't talk as he said he was picking his child up from school	Ardent	Ian Cuncliffe	Teleph one	5				5	
13.09.23	003.05		Email from Ian Cuncliffe detailing working corridor width [30 metres] and he "thought" the permanent easement was around 10 metres. Legal fees will be underwritten for documenting any agreement reached between the parties. No fees are payable for objecting to the project	Ardent	Ian Cuncliffe	Email	15	15	15		45	
13.09.23	20.18		Email to Ian Cuncliffe and James Turley, acknowledging that the Helpringham section had been dropped due to overlap with Anglian Water's South Lincs Reservoir, and therefore asking if there was spare capacity to add us to the scheme for solar and / or BESS to somewhat offset the permanent easement destroying all future development opportunities. I also asked what MW the new scheme is seeing as there is 600 MW on the TEC register	Low Carbon	James Turley	Email	20	20	20		60	No
28.09.23	19.49		Email to Mishcons	Mishcons			20	20	20		60	
10.11.23			Whatsapp - Ed Blundy - saying he had spoken to Ian Cuncliffe	Brown and Co	Ed Blundy	Whatsa	5				5	
11.11.23	09.21		Email from MM to EB complaining about Low Carbon and / or Ardent not meeting us face to face (especially as they know us from 3 years ago) after the summer newsletter showing that they intend to cable across our whole farm east to west which is in excess of 3,000 metres and about half of their cabling route from Ewerby Thorpe to the South Forty Foot. We are also the tenant on two other more northerly fields that they are hoping to cable through so this should be a very important conversation for them	Brown and Co	Ed Blundy	Email	20	20	20		60	
15.11.23	16.13		Email to EB asking him to ask Ardent, again, where the BESS is. Ian Cuncliffe said he didn't even know if there was a BESS. I asked Ed to also ask why aren't they t'ing into 400 kv line.	Brown and Co	Ed Blundy	Email	10	10	10		30	
17.11.23	06.43		Email from Ed Blundy outlining the discussion with Ian Cuncliffe and the imminent papers being served despite no face to face meeting and so many unanswered emails / questions including why us and why not one field north (Council Farms). We have already been subject to NGVL corridor and they haven't. The burden of cabling has been unfairly carried by us.	Brown and Co	Ed Blundy	Email	10	10	10		30	
17.11.23	14.51		Email to Ed Blundy asking if he had claimed 3 year old Low Carbon fees for when they tried to get us in an NSIP but pulled away citing cumulative impact [risk] which was clearly a lie.	Brown and Co	Ed Blundy	Email	10				10	
25.11.23	12.49		Email to Mishcons about finding out in the Beacon fen Newsletter about the cabling attempt through us (3 km) despite us actually knowing James Turley very well	Mishcons	Chanez Lowe + Tom	Email	60				60	
28.11.23	8.00		Teams meeting with Tom Barton: Proposed approach to progressing both an objection to the DCO and a commercial private treaty deal in tandem (each without prejudice to each other); Recoverability of legal fees, particularly in relation to the objection piece; Options for instructing counsel and Next steps.	Mishcons	Tom barton	Teams	30				30	
05.12.23	08.33		Email to Ed Blundy about our own highest and best use projects	Brown and Co	Ed Blundy	Email	20				20	
07.12.23	08.08		Email to Tom Barton and Ed Blundy about quote	Mishcons and Brown & Co	Tom Barton and Ed	Email	6				6	
07.12.23	08.39		Email from Tom Barton about undertaking for fees and defence	Mishcons	Tom Barton	Email	12				12	
08.012.23	13.43		Email from Ian Cuncliffe - re BESS on LCJMF Land - I have spoken to my client and regrettably it remains the position that BESS on your client's land cannot be accommodated within the proposals being taken forward as part of this project									
09.12.23			Email to Tom Barton about ARAG Commercial Dispute Insurance	Mishcons	Tom Barton	Email	12				12	
09.12.23	14.54		Email to John and Lynne Mountain about corridor	LCJMF	Lynne Mountain +	Email	12	12	12		36	
08.12.23	13.43		Email from Ian Cuncliffe re With respect to the route corridor selection for the cable; this has been comprehensively 'optioneered' with a number of relevant environmental and other factors considered. The detail of this exercise will be set out when we go to statutory consultation in the early part of next year. Your client will be able to respond formally to the consultation and we will, of course, be willing to meet with you and your client to discuss the information that will be presented.	Ardent	Ian Cuncliffe	Email	18	18	18		54	
12.12.23	07.17		Email to Ed Blundy explaining that I completely disagreed with the sentence - "we note no response / refusal has been received and now also write to seek access to carry out intrusive surveys." Look at how many times I have tried to meet Low Carbon and Srdent [above]	Brown and Co + Mishcons	Tom Barton and Ed Blundy	Email	18				18	
13.12.23	11.08		Email to Tom barton about access route going under 400 kV line and why there cant be a substation built there or t'ing into the 400 kV line	Mishcons	Tom Barton	Email	18				18	
19.12.23	07.36		Detailed email to Tom Barton about the compromise of our own highest and best use projects	Mishsoons	Tom Barton	Email	42				42	
19.12.23	09.13		QGIS Mapping of NSIP projects to the north of LCJ Mountain Farms Ltd to show proximity [cumulative impact] and to query why they cant come into Bicker 400 kV substation together on the east side of the South Forty	Mishcons	Tom Barton	Email	24				24	
19.12.23	18.55		Email to Tom Barton showing James Turley pulling out of NSIP talks with LCJMF due to concerns about cumulative impact when 99.99 MW was on the TEC Register but now there is 2,132 MW	Mishcons	Tom Barton	Email	18				18	

[illegible]

23.01.24	21.30	Email to share British Museum artifact in Mastins Corner which is not mentioned in the PEIR documents but is right in the middle of the corridor.	Mishcoons	Tom Barton	Email	6					6	
24.01.24		Email about poor conditions for survey	Mishcoons	Tom Barton	Email	6					6	
25.01.24	19.32	Email to Ian Cuncliffe about surveys and wet conditions of farm and how the Option 1 cable line in the PEIR documents does not even match up with the cable corridor and falls outside it on our farm	Ardent	Ian Cuncliffe	Email	24					24	
30.01.24	06.48	Email to Tom Barton and Ed Blundy about meeting agenda seeing with Low Carbon and Ardent	Mishcoons	Tom Barton	Email	24					24	
30.01.24	11.56	Email about Gate 2 offer to a project on the cable corridor	Mishcoons	Tom Barton	Email	24					24	
01.02.24	21.44	Email to Lincolnshire Wildlife Trust about incorrect PEIR documents	Lincs Wild Trust	Charlie	Email	24					24	
01.02.24	22.16	Email to Tom Barton about incorrect PEIR documents	Mishcoons	Tom Barton	Email	6					6	
01.02.24	22.38	Email to Ed Blundy and Tom Barton about 400 kV line	Brown & Co	Ed Blundy	Email	18					18	
01.02.24	22.38	Email from Lincs Wildlife Trust - Yes that's right - these are the only Local Wildlife Sites in the immediate vicinity of the cable route, the next closest being north of Ewerby (parts of the River Sleat/Evedon Wood) or west of Heckington (rail cutting at Beacon Hill)	Lincs Wild Trust	Charlie Barnes	Email	6					6	
02.02.24	15.45	Email to Ed Blundy and Tom Barton creating agenda for Low Carbon meeting - 02.02.24	Brown & Co	Ed Blundy	Email	24					24	
06.02.24	20.43	Sharing of agenda and meeting notes with Directors of LCJMF	LCJMF	John and	Email	24	24		24		72	
07.02.24	09.16	Email to Ed Blundy about the interplay with LCJMF own highest and best use projects	Brown & Co	Ed Blundy	Email	24					24	
07.02.24	21.18	Email to Tom Barton about the incorrect labelling of the option 1 cable route on our farm in the PEIR documents which even falls outside the corridor by c 700 metres at one point using trig points on the maps.	Mishcoons	Tom Barton	Email	18					18	
07.02.24	21.53	Option 1 and 2 cable routes appear to have alternative final mile routes - both routes turn 90 degrees or go straight on. Also discussion about going into the 400 kV overhead transmission line to get across the South Forty Foot.	Brown & Co	Ed Blundy	Email	18					18	
08.02.24	18.15	Email to Ed Blundy asking for an audit on fees / time spent on Low Carbon issues	Brown & Co	Ed Blundy	Email	6					6	
09.02.24	21.18	Email to developer whose projects may be compromised by this cable	Anonymous	Anonymous	Email	24					24	
10.02.24	07.23	Email to Tom Barton about other developer's clause - (This is Exclusivity intended to be legally binding) During the period of 14 months commencing on the date of this Exclusivity Agreement ("the Exclusivity Period") the Landowner agrees it will not: invite tenders or enter into negotiations with any third party, for the sale, development, letting or charging of the Property; or allow any person to view, measure, survey or carry out site investigations on the Property (other than the Tenant's surveyors and the Tenant's other professional advisers) unless required to do so by law	Mishcoons	Tom Barton	Email	24					24	
14.02.24	20.11	Emails to other developers and Tom Barton formulating information to help present to Low Carbon illustrating other interests	Many	Tom Barton	Email	24					24	
16.02.24	17.41	Discussion with Ed Blundy and Tom Barton about Beacon Fen and Ecotricity's Heckington fen NSIPs and how they "could" be working together better - Currently there is an overlap on the southern section of the Offsite Cable Route Corridor and the preferred cable route option for Beacon Fen. The Heckington Fen DCO has assessed the potential impacts of Indicative Drill Locations for cabling within the Energy Park and the Offsite Cable Route Corridor. Within the area of where the Order Limits of the two sites overlap there are 13 No. Indicative Drill Locations for the laying of the offsite underground cable route (Drill Locations A20-A29 and B1-B3) Document Reference (PS-083). These Indicative Drill locations have been assessed in the Proposed Development as either having the potential for an HDD or a similar technology or an 'open cut' to allow the cabling to laid. At Deadline 5 the Applicant has submitted a 'Joint Position Statement with Beacon Fen Energy Park Ltd' (document reference: ExA.JPSBeaconFen.D5.V1). The Applicant has confirmed that all cabling laid for the Heckington Fen application will run within a separate ducting system to that of Beacon Fen Energy Park. It can therefore be concluded the two schemes will not utilise the same HDD drills or open cut cable trenches as assessed in the Proposed Development ES. Therefore, no cumulative assessment has taken place between these two sites to determine the potential environmental impacts of these two schemes using the same indicative drill locations. The Beacon Fen PEIR makes no reference to the possible locations of drill locations within the overlapping sections of the cable routes. EN010123-001044-ExA.IRReport-D4.V3 - Interrelationship with other Nationally Significant Infrastructure Projects - Rev 3	Brown & Co	Ed Blundy	Email	36					36	
		EN010123-001044-ExA.IRReport-D4.V3 - Interrelationship with other Nationally Significant Infrastructure Projects - Rev 3 track.pdf (planninginspectorate.gov.uk)									0	

17.02.24	09.29		Discussion about resources to create map of LCJMF highest and best use projects.	Brown & Co + Mishcons	Ed Blundy + Tom Barton	Email	24						24	
19.02.24	05.58		Discussion about fees incurred - "sustained" objection to the DCO	Mishcons	Tom Barton	Email	24						24	
28.02.24	07.08		Discussion about mapping of LCJMF highest and best use projects	Mishcons	Tom Barton	Email	24						24	
29.02.24	05.25		Discussion about glasshouse design and drawings	Mishcons	Tom Barton	Email	18						18	
02.03.24	08.45		Email showing 420 mins of attempted engagement with Ardent and Low Carbon 15.08.23 to 28.08.23 when I was back in the UK	Mishcons	Tom Barton	Email	18						18	
02.03.24	13.21		Email discussion cable interplay with highest and best use projects	Mishcons	Tom Barton	Email	24						24	
03.03.24	20.24		Extension to consultation deadline for LCJMF due to change in boundary lines. New date 17.03.24	Mishcons	Tom Barton	Email	18						18	
04.03.24	22.15		Email showing PEIR documents and incorrect Option 1 cable pathway which is outside the boundary	Mishcons	Tom Barton	Email	24						24	
06.03.24	19.33		Email / Complaint - from John Mountain [and the Mountain Family] confirming that he does absolutely object to the surveys and under no circumstances said that he was fine with them [Sean Collins-Jones]	Ardent	Sean Collins Jones	Email	24	24	24				72	
07.03.24	11.18		Complaint - Wardell Armstrong walked through recently sprayed fields (fungicide) exposing LCJMF to liability. Complaint about working procedures.	Mishcons	Tom Barton	Email	36	12	12		12		72	
08.03.24	10.36		Complaint to Sean Collins-Jones about survey personnel walking through recently sprayed fields and lack of informing us of presence and asking LCJMF about recent spray programmes.	Ardent	Sean C Jones	Email	36	12	12		12		72	
08.03.24			Complaint - Sean Collins-Jones shared an email thread with LCJMF's Farm Manager which contained sensitive information about LCJMF's highest and best use projects of its own. This threatens LCJMF workforce with the possibility of losing our farm manager.	Ardent	Sean C Jones	Email	8	8	8					
08.03.24	12.03		Email to Jessica Gough about LWS status sites and ecology information	Low Carbon	Jessica	Email	36	12					48	
12.03.24	20.23		MM amendments to objection letter	Mishcons	Tom Barton	Email	18						18	
18.03.24	18.11		Email to Ardent about safe working practices of Wardell Armstrong personnel on our farm during spring spraying programmes. Working group email distribution list	Ardent	Sean C Jones	Email	24	12	12		12		60	
20.03.24	22.02		Email to Katrina Salmon - Wardell Armstrong - about joint safe working practices [spring spraying season] and ecology surveys done by LCJMF	Wardell Armstrong	Katrina Salmon	Email	24	12			12		48	
26.03.24	10.41		Email to Mishcons about not being contacted about John Cope's land which LCJMF rents and which is in the corridor. John Cope confirmed to me that he said to LC representatives that they needed to contact me.	Mishcons	Tom Barton	Email	18	6					24	
05.04.24	09.56		Response from Mishcons re Objection Letter - On the DCO objection there is nothing to do until we have received their response. We then submit a further objection when they submit the Order to the Secretary of State for confirmation, following that there will likely be a public inquiry where we can make submissions as well as cross examine LC's experts.	Mishcons	Tom Barton	Email	18	18	18				54	
13.04.24	07.44		Email to Mary Haine re geophysical surveys and not driving on crops	Wardell Armstrong	Mary Haine	Email	18	6			6		30	
20.04.24	17.01		Email to Mary Haine about LWS status sites and ecology and alternative routes	Wardell Armstrong	Mary Haine	Email	18	6			6		30	
17.05.24	07.19		Discussion about Option 3 cable route going down the Little Hale Fen Road	Brown & Co	Ed Blundy	Email	18	6					24	
01.06.24	13.09		Email to Jessica Gough about alternative routes	Low Carbon	Jessica	Email	36	18					54	
03.06.24	06.29		Email asking if botanical surveyors have a lot of experience - higher than FISC level 4 or an equivalent (and be more than just competent if taking on aquatic vegetation surveys).	Wardell Armstrong	Kerris Taylor	Email	18	6					24	
21.06.24	11.14		Email to Jessica Gough highlighting lack of engagement	Low Carbon	Jessica	Email	36	12					48	
25.06.24	12.03		Email from Jessica Gough - The full ecology and geophysical survey reports will be appended to the Environmental Statement, which will be available to download from our website once the application has been submitted. The survey findings will also be summarised within the baseline sections of the Ecology and Cultural Heritage chapters. Separately to this, our land team will be in contact in the coming weeks to discuss the commercial land agreement terms we have been working through. These terms will be to seek a voluntary agreement for the rights that will be sought in your land, but we are also keen to hear about technical interface concerns or issues (especially if there are lessons to be learnt from other projects) that we would seek to address through the private treaty agreement. Still no contact 20.08.24 - 2 months later.	Low Carbon	Jessica Gough	Email	12	12	12				36	

[illegible]

ExD4.2

Evidence of only three 30-minute online meetings to discuss the LCJM Aug 2023 offer and the LCJM Hybrid cable route south through our farm

Dates of meetings – **31.10.25**, **08.09.25** and **31.01.24**

📁📧	Subject	Location	Start ▲	End
▼ (none): 2 item(s)				
📅	FW: [EXTERNAL] BF HoTS call	Microsoft Teams Meeting	Mon 8/09/2025 7:00 PM	Mon 8/09/2025 8:00 PM
📅	Beacon Fen meeting	Microsoft Teams Meeting	Fri 31/10/2025 9:00 PM	Fri 31/10/2025 10:00 PM

From: Ian Cunliffe [redacted]
Sent: Tuesday, January 30, 2024 7:25 PM
To: Ed Blundy [redacted]
Cc: [redacted]
[\[redacted\]@management.com](mailto:[redacted]@management.com)> [redacted]
Subject: RE: LCJ Mountain Farms - Beacon Fen - Land Access Request

Ed,

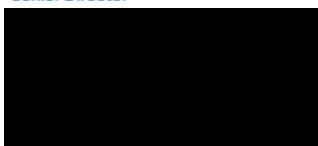
Apologies, at this short notice a call tomorrow at 0900 won't be possible Can we look at an alternative time (with a reduced agenda) please?

Thanks

Ian



Ian Cunliffe MRICS, RICS Expert Witness
Senior Director



From: Ed Blundy [redacted]
Sent: Tuesday, January 30, 2024 5:41 PM
To: Ian Cunliffe [redacted]

Subject: RE: LCJ Mountain Farms - Beacon Fen - Land Access Request

External e-mail - Please think before clicking any links or opening attachments.

Hi Ian,

Some summary agenda items/ topics:

1. Grid connection and options re teeing into the 400kV line;
2. Corridor selection process;
3. Engagement (to date, and in future);
4. Interplay with other projects;
5. Fees and undertakings;
6. Notices and surveys;
7. Physical impact of cables;
8. Cumulative impact issues.

I appreciate that it is getting late, but if you are able to confirm whether the call in the morning is possible, that would be appreciated.
















Thanks and regards

Ed

Ed Blundy, MRICS FAAV REV
Land Agent, Partner

ExD4.3

Evidence of small number of emails received from the applicant and its land agent since the end of 2024.

Sean Collins-Jones: 6 item(s)				
	Sean Collins-Jones	RE: Beacon Fen - LCJ Mountain Farms Ltd and Mountain SSAS - objection [and meeting AGR today]	Thu 12/06/2025 11:48 PM	12 MB
	Sean Collins-Jones	RE: Beacon Fen - LCJ Mountain Farms Ltd and Mountain SSAS - objection [and meeting AGR today]	Fri 30/05/2025 12:41 AM	12 MB
	 Sean Collins-Jones	RE: Beacon Fen - LCJ Mountain Farms Ltd - objection to extension of red line boundary - pushing construction traffic down a Local Wildlife S...	Thu 13/02/2025 12:48 AM	27 MB
	 Sean Collins-Jones	Beacon Fen DCO - VA HOT's - Cable Route - Mountain Interests.	Sat 18/01/2025 3:11 AM	2 MB
	Sean Collins-Jones	RE: Beacon Fen - LCJ Mountain Farms Ltd - objection to extension of red line boundary - pushing construction traffic down a Local Wildlife S...	Mon 13/01/2025 7:09 PM	25 MB
	Sean Collins-Jones	RE: LambWeston - Beacon Fen Energy Park - Land Interest Questionnaire ('LIQ')	Tue 19/11/2024 10:28 PM	5 MB
Ilan Cunliffe: 6 item(s)				
	Ilan Cunliffe	RE: LCJ Mountain Farms Ltd - D3 submission	Sat 1/11/2025 2:01 AM	195 KB
	Ilan Cunliffe	RE: LCJMF D2 Draft & Proposal for Early Resolution Meeting (Beacon Fen DCO)	Fri 31/10/2025 8:05 PM	789 KB
	Ilan Cunliffe	Beacon Fen meeting	Thu 30/10/2025 9:33 PM	43 KB
	Ilan Cunliffe	Beacon Fen meeting	Tue 28/10/2025 9:24 PM	24 KB
	Ilan Cunliffe	RE: [EXTERNAL] Re: LCJMF D2 Draft & Proposal for Early Resolution Meeting (Beacon Fen DCO)	Tue 28/10/2025 9:19 PM	1 MB
	Ilan Cunliffe	Automatic reply: LCJMF D2 Draft & Proposal for Early Resolution Meeting (Beacon Fen DCO)	Wed 22/10/2025 11:04 AM	14 KB
James Davey: 6 item(s), 1 unread				
	James Davey	Automatic reply: LCJMF D2 Draft & Proposal for Early Resolution Meeting (Beacon Fen DCO)	Fri 24/10/2025 9:29 AM	15 KB
	James Davey	Re: LCJMF D2 Draft & Proposal for Early Resolution Meeting (Beacon Fen DCO)	Fri 24/10/2025 2:44 AM	852 KB
	James Davey	Re: LCJMF D2 Draft & Proposal for Early Resolution Meeting (Beacon Fen DCO)	Tue 21/10/2025 9:39 PM	821 KB
	 James Davey	Re: LCJ Mountain Farms Ltd - Low Carbon Beacon Fen - updated HOTs	Wed 24/09/2025 11:04 PM	927 KB
	 James Davey	Re: LCJ Mountain Farms Ltd - Low carbon Beacon Fen	Wed 24/09/2025 1:24 AM	860 KB
	James Davey	Re: Procedural Breaches and Sequential Test Failures - LCJMF Objection to Beacon Fen Routing	Thu 19/06/2025 8:02 PM	5 MB

ExD4.4

Quality of engagement: letter from Mishcon de Reya to Ardent dated 21 December 2023 setting out seven technical and routing questions (point of connection, alternatives, TEC capacity, BESS configuration, cumulative impact)

Mishcon de Reya
Africa House

Our Ref: 100887.20

Your Ref: Low Carbon - Beacon Fen Energy Park

London | Cambridge | Oxford | Hong Kong | Singapore

Sean Collins-Jones
Principal Surveyor
Ardent

21 December 2023

BY EMAIL ONLY
(BEACONFENERGYPARK@ARDENT-
MANAGEMENT.COM)

Dear Mr Collins-Jones

Low Carbon's Proposed Beacon Fen Energy Park (the Project) - intrusive surveys

We act for LCJ Mountain Farms Limited (the "**Client**") and refer to your letter dated 08 December 2023 with the above reference regarding the Project.

Our client entirely refutes your assertion that "*no response/refusal has been received*" to your letters to date. We have been provided with a detailed schedule of calls and emails from Matthew Mountain on behalf to our Client to Low Carbon which all remain unanswered.

Before matters can be progressed our Client requires clarification on the following points:

1. Why it is not possible to tee off the existing 400kv line running to Bicker substation, avoiding the need for the current proposed cabling route. We note from our maps that you have a corridor right under the 400kv line at the south west of Ewerby village linking the site to the A17;
2. Why the cabling cannot be run north – south rather than east – west which would considerably decrease the Project's impact on my Client's land;
3. Whether diverting the cabling through land to the north of our client's land has been considered, given it is in the ownership of Lincolnshire County Council;
4. Why when the project is listed on the Transmission Entry Capacity register as a 600MW project although your letter refers to a 400MW project;

Mishcon de Reya is a limited liability partnership, registered in England and Wales (number OC399969), with registered office at Africa House, 70 Kingsway, London WC2B 6AH, authorised and regulated by the Solicitors Regulation Authority, SRA number 624547.

2369885.1

5. Why the cabling cannot follow the Little Hale Fen Road (per the AGR Solar project);
6. Whether the Project will incorporate BESS and if so where this is anticipated to be located; and
7. Use of our client's land for a previous potential BESS and solar project was not progressed in 2021 by Low Carbon because of "*the acreage available and the proximity to numerous other solar schemes (and therefore project risks through cumulative impact)*". How has Low Carbon satisfied itself that the same issues of cumulative impact do not apply to the Project.

Can a meeting with our Client's agent, Ed Blundy of Brown & Co, please be arranged as a matter of urgency to discuss these issues. There will undoubtedly be further points which our Client requires clarity on in that meeting and an agenda can be set once the meeting is arranged.

Until our Client has had satisfactory responses to the above points, they are not amenable to engaging in discussions regarding the terms of any licence.

Lastly, can all further correspondence in this matter please be directed either to Tom Barton of this firm directly (details below) or Mr Blundy with Mr Barton in copy.

Yours faithfully



Mishcon de Reya LLP

Direct Tel:

Email:



ExD4.5

Email from Ian Cunliffe (Ardent) to Ed Blundy (Brown & Co), sent in response to Mishcon de Reya's letter of 21 December 2023 (Ex25). The Applicant does not provide specific or evidence-based answers to the seven queries raised, instead referring back to Chapter 3 ("Alternatives and Design Evolution") of the PEIR and generic consultation material.

Key issues raised by LCJMF — including north–south routing, diversion via Lincolnshire County Council land, the use of Little Hale Fen Road, BESS siting, and cumulative impact inconsistencies — were not addressed in a quantified or site-specific way. The response relies on standard consultation wording and website links, underlining the absence of substantive engagement with LCJMF's reasonable and technically grounded alternatives during the statutory consultation process.

From: Ian Cunliffe [REDACTED]
Sent: Tuesday, January 23, 2024 8:05 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Land Access Request - Mr Mountain - Beacon Fen - stc

Dear Ed,

Further to the letter from Tom, attached to this email, and now with the benefit of the availability of the Statutory Consultation material, we have provided responses to the queries raised below:

1. Our point of connection is designated by National Grid Electricity Transmission (NGET). NGET decide where developers like Low Carbon connect into the Grid and this is based on an internal technical planning process.
2. The proposed cable route corridor has been subject to a number of rounds of review and iteration to identify the most suitable proposed cable route for the Proposed Development. A summary of the process undertaken is described in sections 3.5.10 to 3.5.12 of Chapter 3: Alternatives and Design Evolution of our PEIR (available on our Project Statutory Consultation website - <https://www.beacon-fenenergypark.co.uk/documents/?category=StatutoryConsultation#documents>).
3. Please see the response to the question above, which explains the process undertaken to date in respect of the identification of the proposed cable route corridor.
4. Section 3.5 of Chapter 3 of our PEIR explains the design evolution of the Proposed Development, and particularly the removal of "Beacon Fen South" following our earlier non-statutory consultation last year. The result of the removal of the southern component of our original scheme has reduced the anticipated generation capacity of the project to around 400MW.
5. Please see response to Question 2.
6. Beacon Fen Energy Park includes a BESS up to 600MW which will be centrally located within the solar array site (please see Mitigation Layout Plan [Indicative-Mitigation-Layout-jpg.webp \(9933x7015\) \(beaconfenenergypark.co.uk\)](#)).
7. Low Carbon considers the solar array area chosen for Beacon Fen Energy Park to be suitable in terms of the amount of land available, environmental characteristics, and other relevant matters set out in policy. The PEIR provides reporting on all relevant environmental topics.

We would also draw attention to our consultation documents which provide more substantive information on the Project, including in the Preliminary Environmental Information Report. Considering the nature of your queries, you may be particularly interested in Chapter 3: Alternatives & Design Evolution, which includes preliminary information on the evolution of the design of the Project to date. The materials are available to review [here](#). Our consultation runs until Sunday 3 March, and our website also provides detail on how feedback can be provided in response to the materials within this period.

We hope the clarification we have provided is sufficient to address your queries, but would request that any additional comments or queries you may have are submitted in response to our consultation, which we will have regard to when preparing our application. In respect of a meeting, my client can offer a MS Teams meeting on 25th January. However, to manage expectations, we would propose to focus on any land access issues, rather than expand further on the points raised above. It is our position that the land access/agency issues should not be conflated or made conditional in respect of the responses to queries raised in the letter.

Please do let us know if you would still require a meeting, and if so, please can you propose an agenda.

Kind regards,

Ian



Ian Cunliffe MRICS, RICS Expert Witness
Senior Director

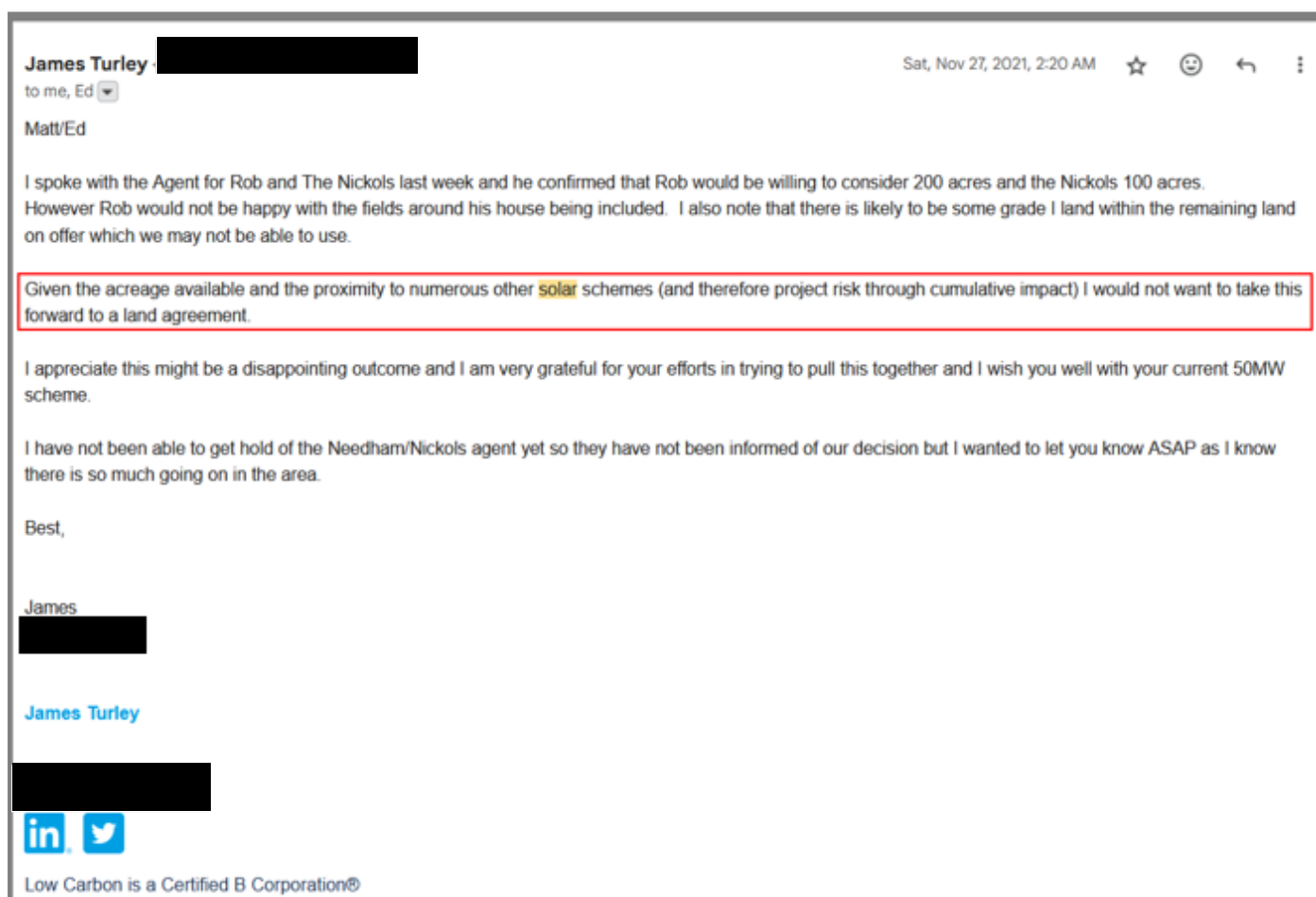
ExD4.6

Document: Applicant's response email to LCJMF's November 2021 land offer (516 acres / ~209 ha), located ~2.7 km from Bicker Fen Point of Connection. In this email, the Applicant declines to proceed **"given the acreage available and the proximity to numerous other solar schemes (and therefore project risk through cumulative impact)"**.

Notes:

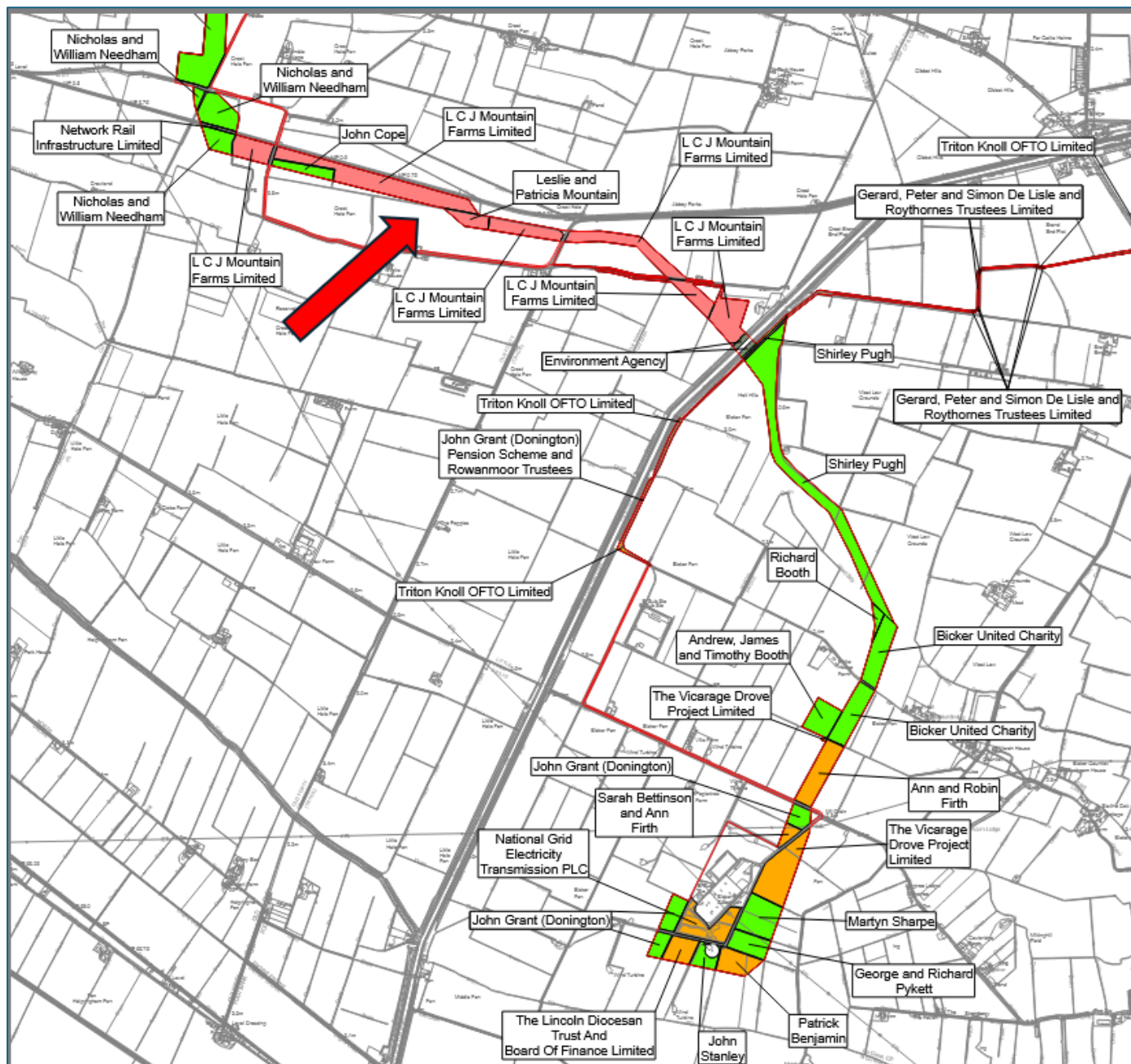
- Correspondence reproduced in full.
- This decision predates BFS removal and TEC escalation (Ex14), establishing the baseline for subsequent alternatives analysis.
- The offer fell within the Applicant's 10 km site selection radius.

Source: Email from James Turley (Low Carbon) to LCJMF, 27 November 2021. © LCJ Mountain Farms Ltd 2025.

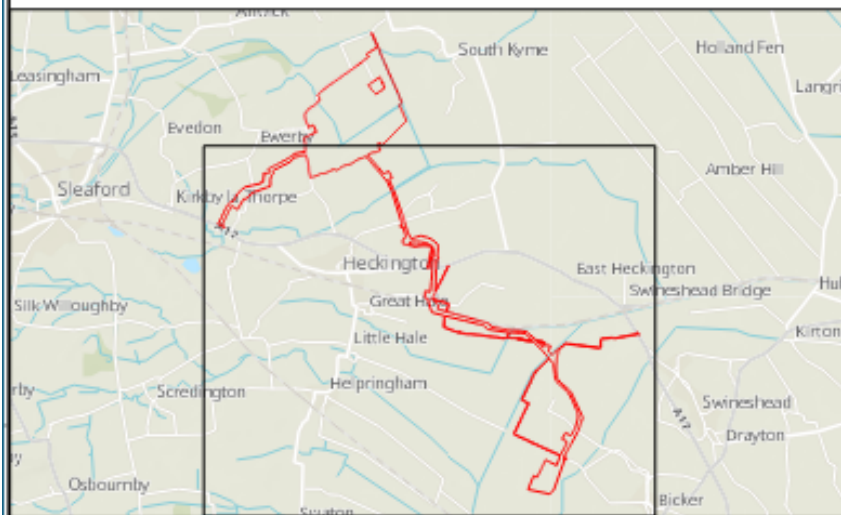


ExD4.7





Extract from the Applicant's Voluntary Negotiation Status Plan (Document 9.12, Ref. EN010151-000605) showing LCJMF's status as "Heads of Terms in discussion – not likely to be agreed prior to close of examination"



KEY PLAN

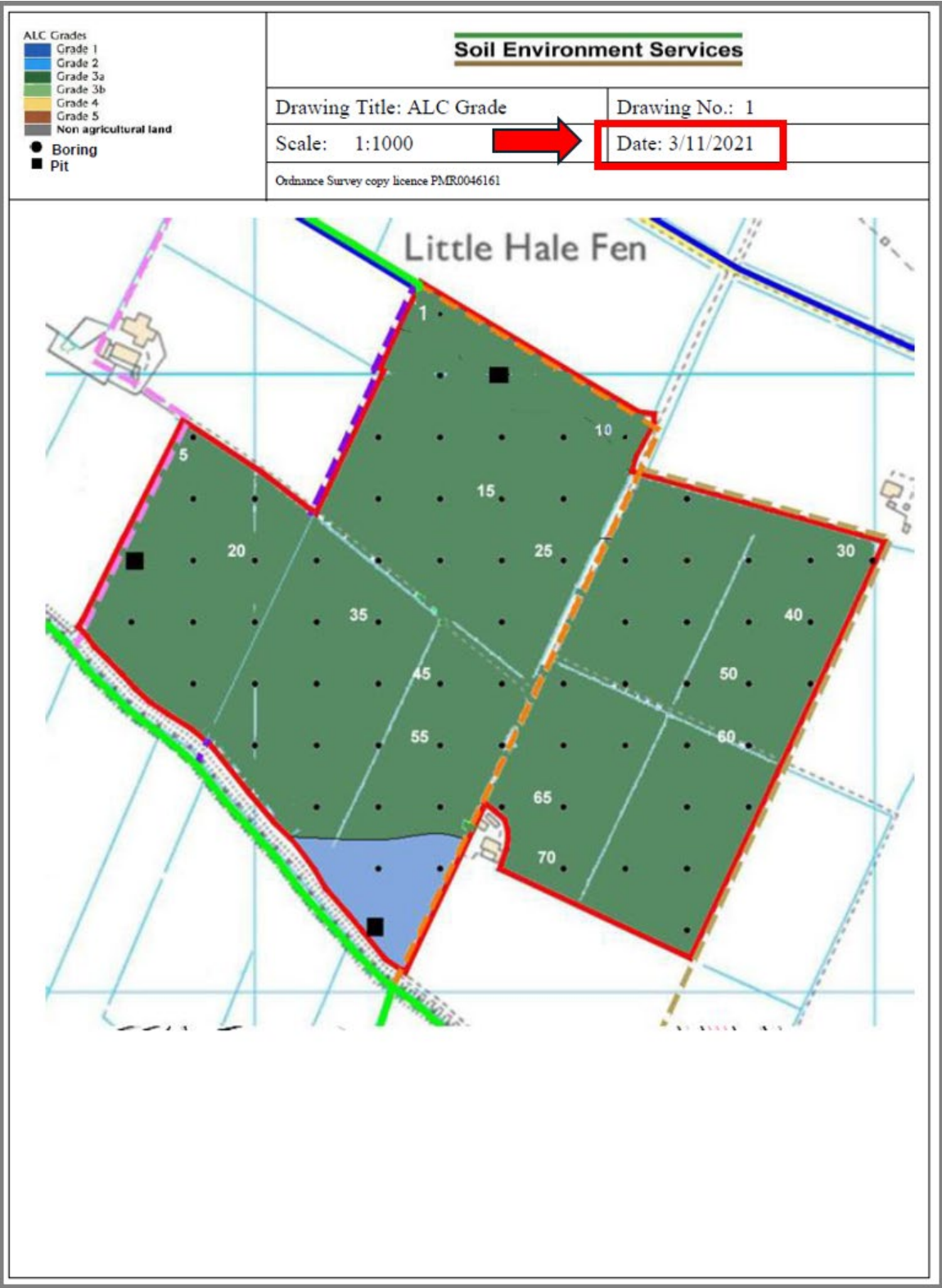


Key

-  Order limits
-  Heads of Terms and / or Option Agreement agreed
-  Heads of Terms in discussion and likely to be agreed prior to the close of Examination
-  Heads of Terms in discussion and not likely to be agreed prior to the close of Examination

ExD4.8

Source: Soil Environment Services (SES), “ALC Grade and Survey Points – Little Hale Fen Solar Farm” (Drawing 1; scale 1:1000; dated 03/11/2021; SES ref SES/AP/LHF/#V2), prepared for Axis PED.
Date of survey: 2–3 November 2021.



Copyright: Contains OS data © Crown copyright and database right 2021 (OS copy licence PMR0046161). Reproduced for the Beacon Fen examination with permission of Axis PED / Soil Environment Services.
Note: This exhibit reproduces Drawing 1 from the SES ALC survey report. The full report is held by LCJMF and can be submitted to the Examining Authority upon request.

Applicant ALC desktop map (APP-054 Appendix 2) with manual AGR3 overlay (Grade 3a)

Source: DWD / Low Carbon ALC map (APP-054 Appendix 2) overlaid by LCJMF to show AGR3 site boundary and field-surveyed Grade 3a classification. Contains OS data © Crown copyright and database right 2023.

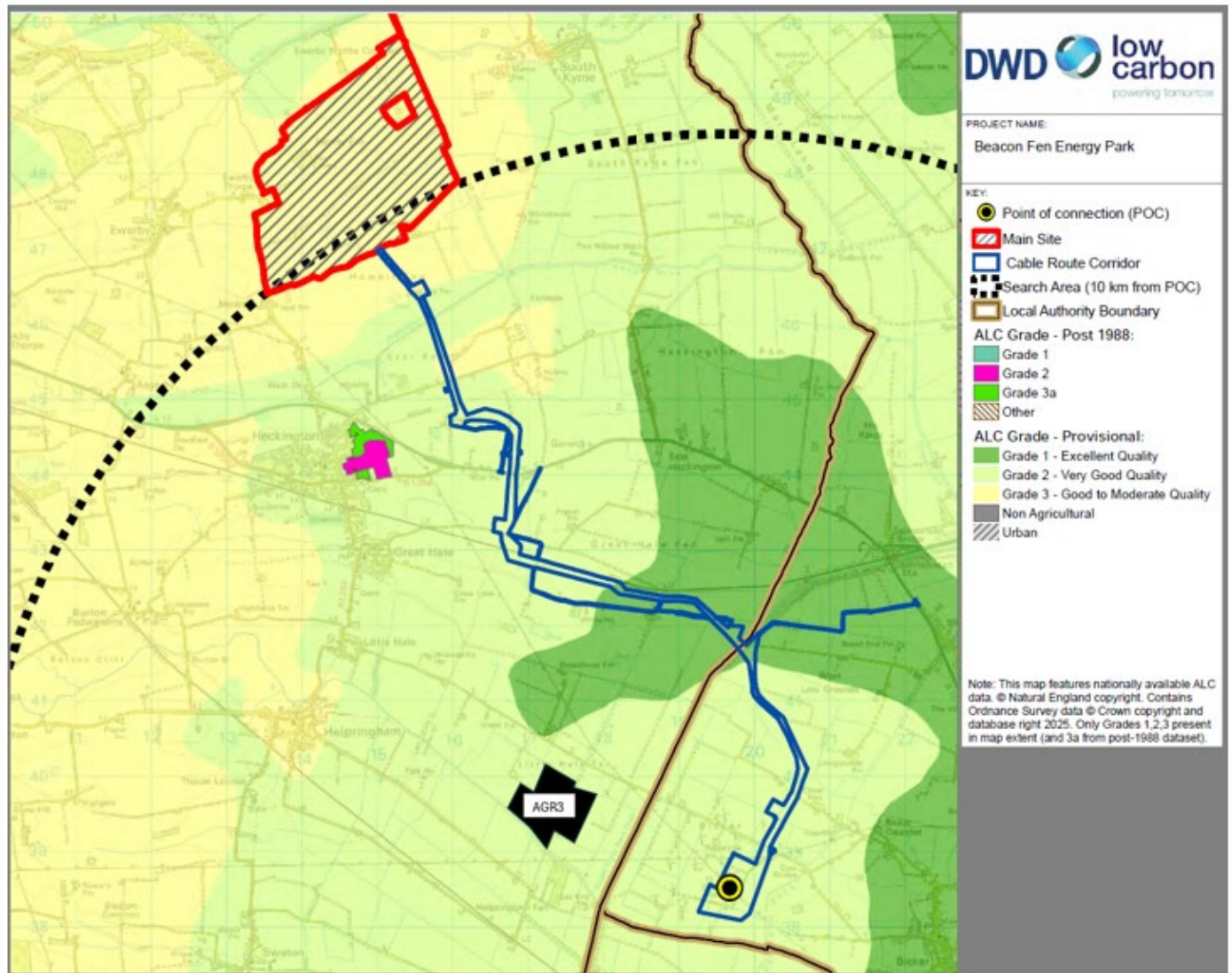


Figure: Extract from Applicant's Planning Statement (APP-277), Appendix 2 – Site Selection Report, Annex D: Assessment Mapping Results (ALC Grades), prepared by DWD for Low Carbon (Beacon Fen Energy Park), with LCJMF AGR3 overlay.

Contains OS data © Crown copyright and database right 2025. Agricultural Land Classification datasets © Natural England 2025 (Provisional 1:250k; Post-1988 detailed). Licensed under the Open Government Licence v3.0. Used for examination commentary.

ExD4.9b

Applicant ALC desktop map (APP-054 Appendix 2) with manual AGR3 overlay (Grade 3a) and **LCJM Hybrid offer**

Source: DWD / Low Carbon ALC map (APP-054 Appendix 2) overlaid by LCJMF to show AGR3 site boundary and field-surveyed Grade 3a classification. Contains OS data © Crown copyright and database right 2023.

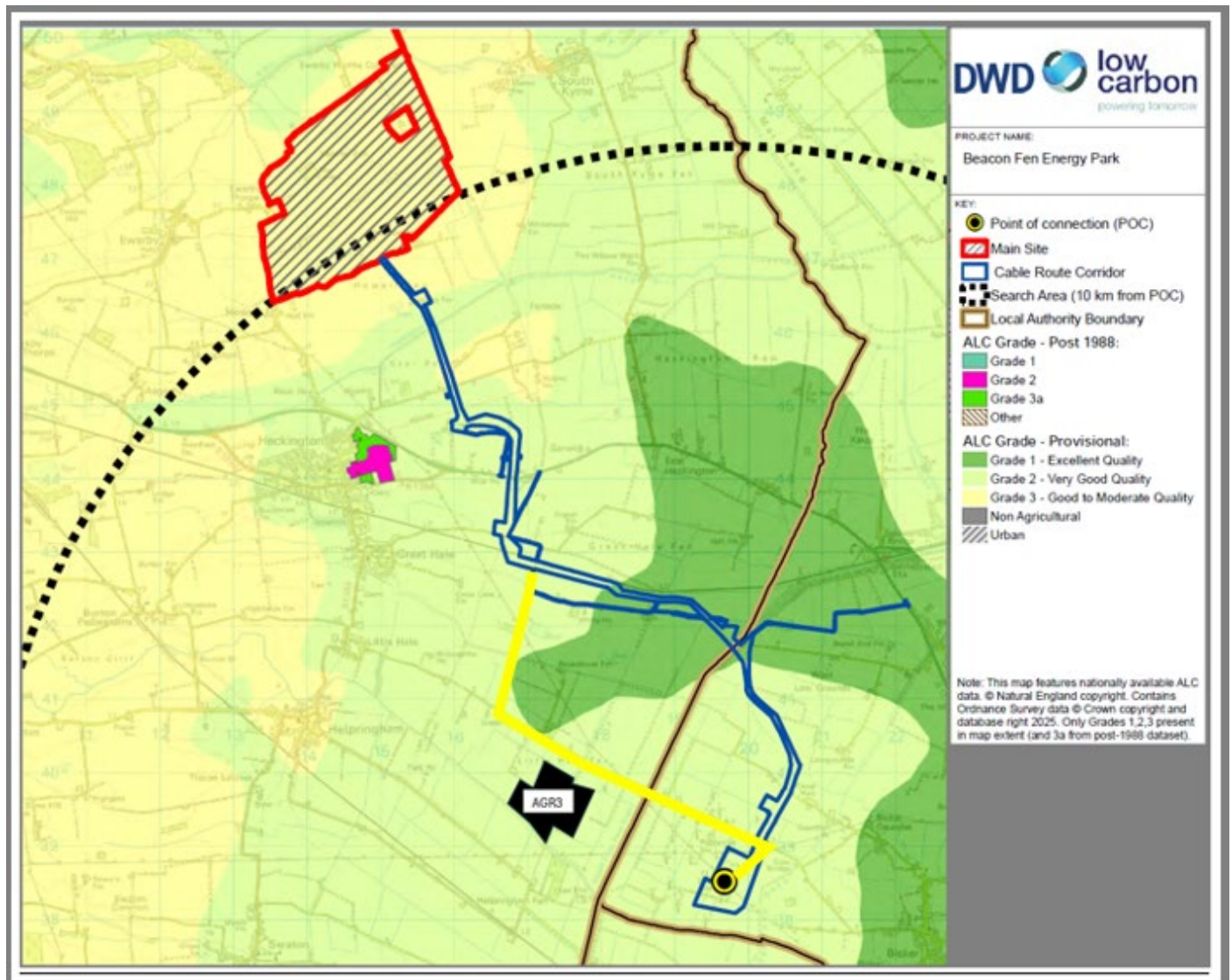


Figure: Extract from Applicant's Planning Statement (APP-277), Appendix 2 – Site Selection Report, Annex D: Assessment Mapping Results (ALC Grades), prepared by DWD for Low Carbon (Beacon Fen Energy Park), with LCJMF AGR3 overlay.

Contains OS data © Crown copyright and database right 2025. Agricultural Land Classification datasets © Natural England 2025 (Provisional 1:250k; Post-1988 detailed). Licensed under the Open Government Licence v3.0. Used for examination commentary.

ExD4.10

Figure: Extracts from the National Grid ESO Transmission Entry Capacity (TEC) Register for November 2021 and August 2024, illustrating the increase in contracted capacity in the Bicker Fen / Viking Link area from approximately 99 MW to over 2.1 GW.

Source: National Grid ESO, TEC Register (publicly available). Capacity figures rounded to the nearest MW.

TEC Register - 26.01.21

Project	Customer Name	Connec	Stage	MW Conn	MW Ince	Cumulativ	MW Effective From	Project Status	Agreement Type	HOST TO	Plant Type
Bicker Fer AGR SOLAR 2 LIMITED	Bicker Fen			0	49.99	49.99	7/01/2023	Awaiting Consents	Directly Connected	NGET	PV Array (Photo Voltaic/solar)
Bicker Fer AGR SOLAR 3 LIMITED	Bicker Fen			0	49.99	49.99	11/01/2023	Awaiting Consents	Directly Connected	NGET	PV Array (Photo Voltaic/solar)

TEC Register - 03.09.21

Project	Customer Name	Connec	Stage	MW Conn	MW Ince	Cumulativ	MW Effective From	Project Status	Agreement Type	HOST TO	Plant Type
Bicker Fer AGR SOLAR 2 LIMITED	Bicker Fen			0	49.99	49.99	7/01/2023	Awaiting Consents	Directly Connected	NGET	PV Array (Photo Voltaic/solar)
Bicker Fer AGR SOLAR 3 LIMITED	Bicker Fen			0	49.99	49.99	11/01/2023	Awaiting Consents	Directly Connected	NGET	PV Array (Photo Voltaic/solar)

TEC Register - 14.10.22

Project	Customer Name	Connection Site	Stage	MW Coi	MW Inc	Cumul	MW Effective From	Project Status	Agreement Type	HOST TO	Plant Type
Bicker Fer LOW CARBON SOLAR PARK 16 LIMITED	Bicker Fen 400kV Substation		0	600	600		1/06/2029	Scoping	Directly Connected	NGET	Energy Storage System; PV Array (Photo Voltaic/solar)
Bicker Fer AGR SOLAR 2 LIMITED	Bicker Fen 400kV Substation		0	49.995	49.995		31/10/2023	Awaiting Consents	Directly Connected	NGET	PV Array (Photo Voltaic/solar)
Bicker Fer AGR SOLAR 3 LIMITED	Bicker Fen 400kV Substation		0	49.995	49.995		1/07/2024	Awaiting Consents	Directly Connected	NGET	PV Array (Photo Voltaic/solar)
Heckington ECOTRICITY GENERATION LIMITED	Bicker Fen 400kV Substation		0	400	400		1/10/2027	Scoping	Directly Connected	NGET	Energy Storage System; PV Array (Photo Voltaic/solar)

TEC Register - 16.08.24

Project Name	Customer Name	Connection Site	Stage	MW Coi	MW Inc	Cumul	MW Effective From	Project Status	Agreement Type	HOST TO	Plant Type
Bicker Fen 1 Solar	AGR SOLAR 2 LIMITED	Bicker Fen 400kV Substation	1	0	49.995	49.995	30/05/2025	Awaiting Consents	Direct Cor NGET	NGET	PV Array (Photo Voltaic/solar)
Bicker Fen 1 Solar	AGR SOLAR 2 LIMITED	Bicker Fen 400kV Substation	2	0	7.005	57	1/04/2035	Scoping	Direct Cor NGET	NGET	PV Array (Photo Voltaic/solar)
Bicker Fen 2 Solar	AGR SOLAR 3 LIMITED	Bicker Fen 400kV Substation	1	0	49.995	49.995	30/09/2025	Awaiting Consents	Direct Cor NGET	NGET	Energy Storage System; PV Array (Photo Voltaic/solar)
Bicker Fen 2 Solar	AGR SOLAR 3 LIMITED	Bicker Fen 400kV Substation	2	0	7.005	57	1/04/2033	Scoping	Direct Cor NGET	NGET	Energy Storage System; PV Array (Photo Voltaic/solar)
Bicker Fen PV & BESS Sub	O&G Solar (SPV 40) Limited	Bicker Fen 400kV Substation		0	249.9	249.9	30/05/2033	Scoping	Direct Cor NGET	NGET	Energy Storage System; PV Array (Photo Voltaic/solar)
Bicker Fenn Energy Park	BEACON FEN ENERGY PARK LIMITED	Bicker Fen 400kV Substation		0	600	600	1/06/2029	Scoping	Direct Cor NGET	NGET	Energy Storage System; PV Array (Photo Voltaic/solar)
Denton Estate Solar PV and BESS	ELGIN ENERGY ES CO LIMITED	Bicker Fen 400kV Substation		0	129	129	30/10/2033	Scoping	Embedder NGET	NGET	Energy Storage System; PV Array (Photo Voltaic/solar)
Heckington Fen Solar Park	ECOTRICITY GENERATION LIMITED	Bicker Fen 400kV Substation		0	400	400	1/10/2027	Scoping	Direct Cor NGET	NGET	Energy Storage System; PV Array (Photo Voltaic/solar)
Temple Oaks Renewable Energy Park	RIDGE CLEAN ENERGY LTD	Bicker Fen 400kV Substation		0	240	240	30/10/2033	Awaiting Consents	Embedder NGET	NGET	Energy Storage System; PV Array (Photo Voltaic/solar)
Tyler Hill Bicker Fen	FRV TH Powertek Limited	Bicker Fen 400kV Substation		0	400	400	30/05/2035	Scoping	Direct Cor NGET	NGET	Energy Storage System

ExD4.11

NDVI (03.10.2023) – Starvalls Field cable corridor condition – Field TF 1941 4286

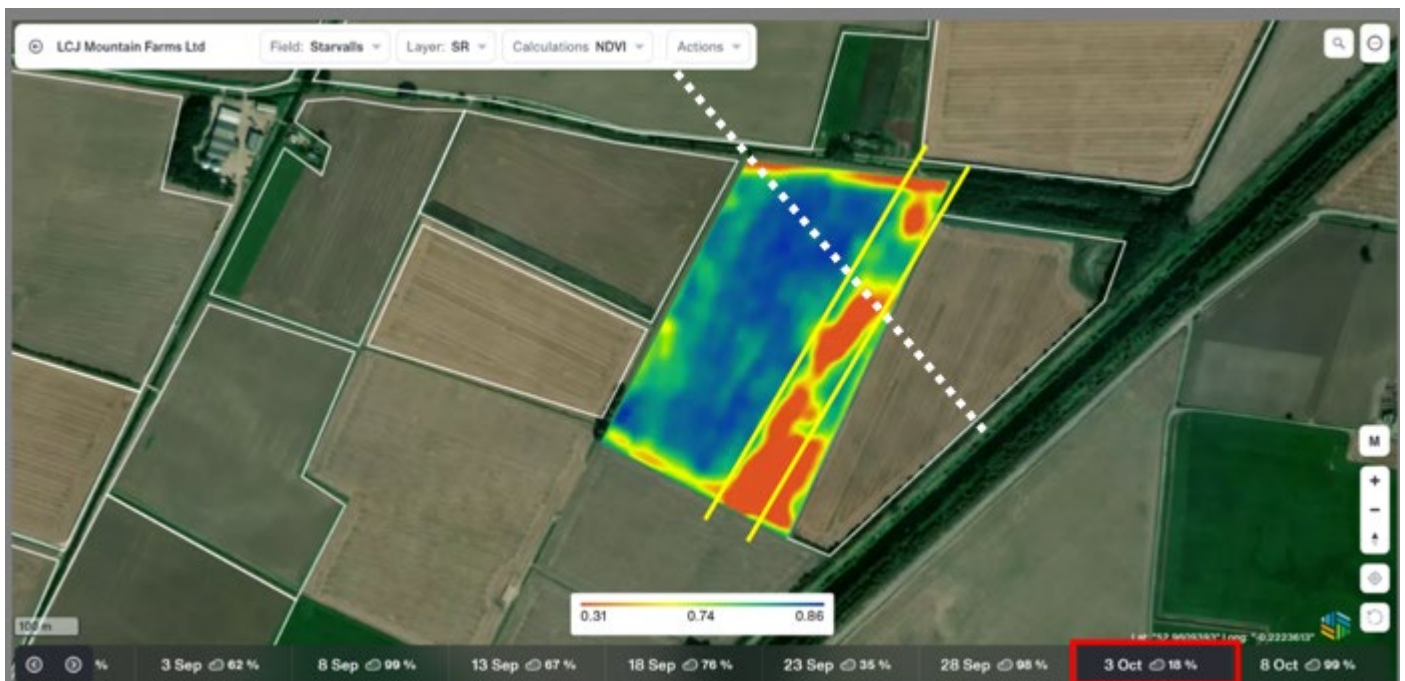
Description:

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

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


Source:

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



The Option 1 Low carbon cable route is the white dashed line above.

Soil structure and texture monitoring report for Far 52 and Starvalls Field (pre- and post-Viking Link construction), including maps, soil descriptions and assessment of structural degradation on reinstated land



Soil survey report into changes after reinstatement of the pipeline for
Viking Link on 2 fields at

L. C. J. Mountain Farms Ltd
Sleaford
Lincs.

Survey before pipeline construction in October 2021

After reinstatement in July 2023

Undertaken by:
Jeremy Hollis PhD

SOYL Red Shute Mill, Hermitage, Thatcham, Berkshire, RG18 9QJ
Tel: [REDACTED]

Topsoil structure results

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

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

ExD4.13

Photo set – Starvalls Field flooding on Viking Link corridor (21.10.2023) and control

Description:

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

Source:

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



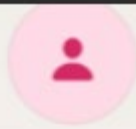








1



Dad

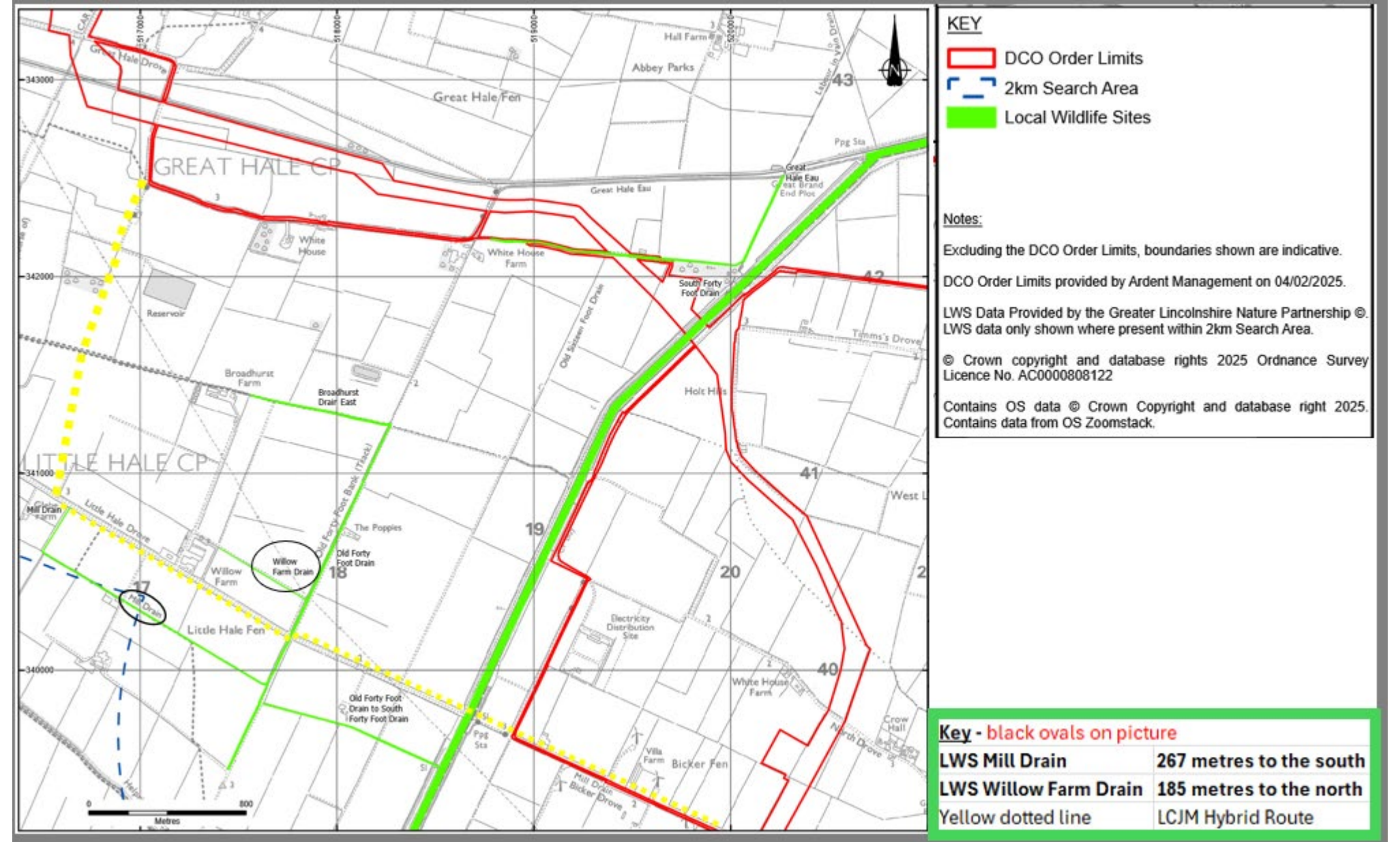
21 Oct 2023



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

19:02

ExD4.14 – Diagram showing spatial characteristics of LWS4489 Mill Drain (267 metres to the south) and LWS4520 Willow Farm Drain (185 metres to the north) of the LCJM Hybrid route (yellow dotted line).



ExD4.15

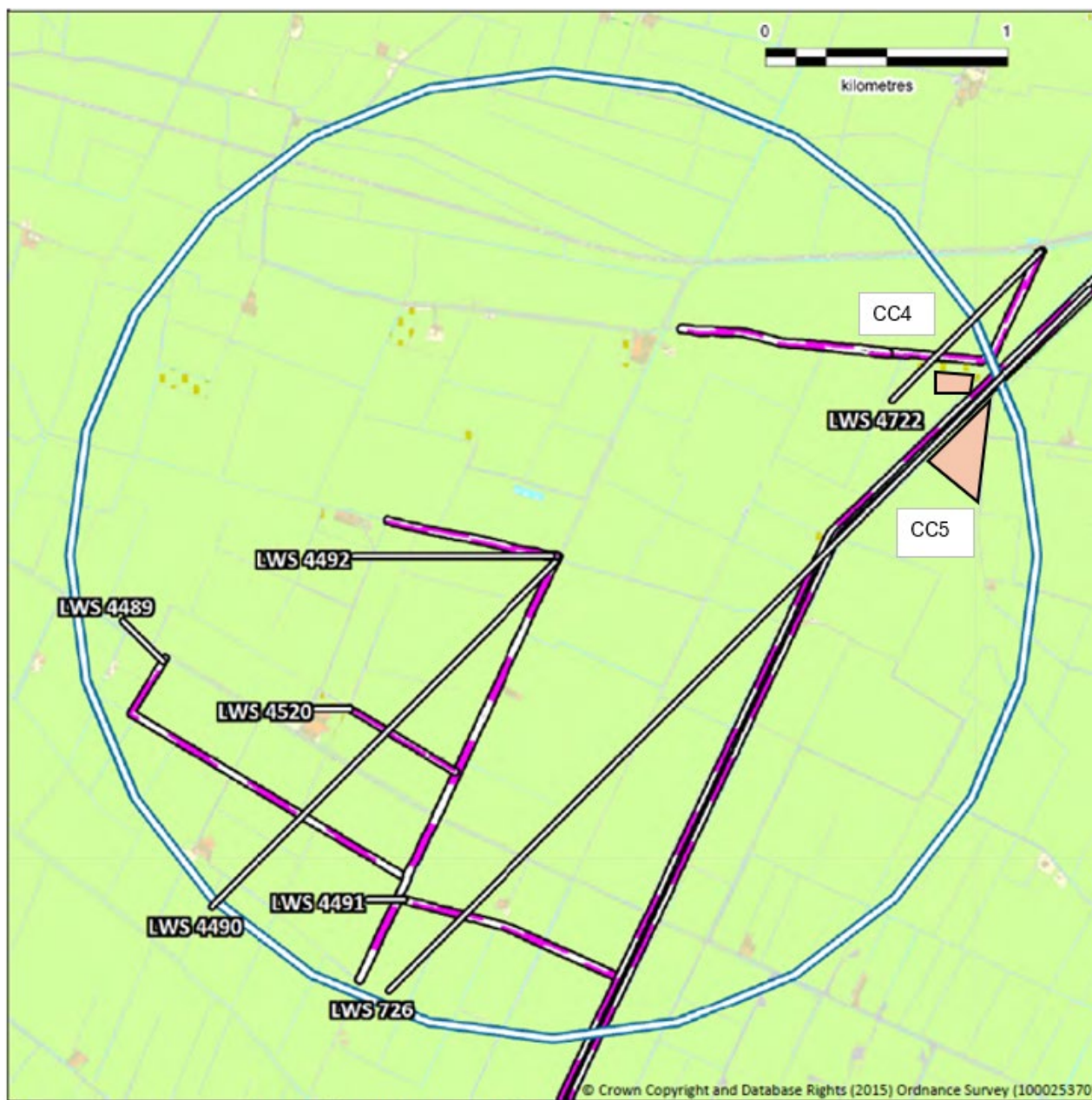
This map overlays Local Wildlife Site (LWS) 4722 (Great Hale Eau) and LWS 726 (South Forty Foot Drain) with the Applicant's proposed CC4 and CC5 compound locations. LWS 4722 was designated in 2016 for its notable freshwater and wetland plant assemblages, while LWS 726 corresponds to the South Forty Foot Drain. The CC4 and CC5 compound footprints lie contiguous to—and in places overlap with—the mapped LWS extents, indicating a risk of direct and indirect impacts on designated aquatic and riparian habitats and their associated species. The overlay is derived from Greater Lincolnshire Nature Partnership (GLNP) / Lincolnshire Environmental Records Centre (LERC) datasets as reproduced in Scarborough Nixon Associates Ltd's 2017 Ecology and Protected Species Survey for Great Hale and Little Hale.

Source: Scarborough Nixon Associates Ltd, *Ecology and Protected Species Survey, Land at Great Hale and Little Hale, Lincolnshire* (Sept 2017), using GLNP/LERC LWS layers (4722, 726).

Copyright & attribution: Contains OS data © Crown copyright and database right 2016/2025. LWS data © Greater Lincolnshire Nature Partnership / LERC. Used for examination commentary.

Method & limitations: The overlay is indicative (digitised from 2017 GLNP/LERC outputs) and not a definitive boundary; intersection conclusions should be confirmed through GIS using the latest LERC polygons.

Non-statutory sites within the search area



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

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

ExD4.16

Description:

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

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

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

3.19 *Cable Route*

24

The Tenant shall use reasonable endeavours to locate any infrastructure or equipment which it intends to lay within or alongside Little Hale Drove, so as to allow additional infrastructure or equipment to be laid in Little Hale Drove by the Landlord in connection with the development of the Landlord's Adjoining Property for any purpose, provided that where a crossing agreement or similar is required clause 10.3 shall apply.

ExD4.17

Diagram showing cable route and construction access for 1.19 km along LWS 4722 including woodland South of LWS 4722 – Hydrological & Ecological Connectivity, and 0.43 ha AB1 Nectar Flower Mix and Construction Access Down LWS 4722

Description:

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

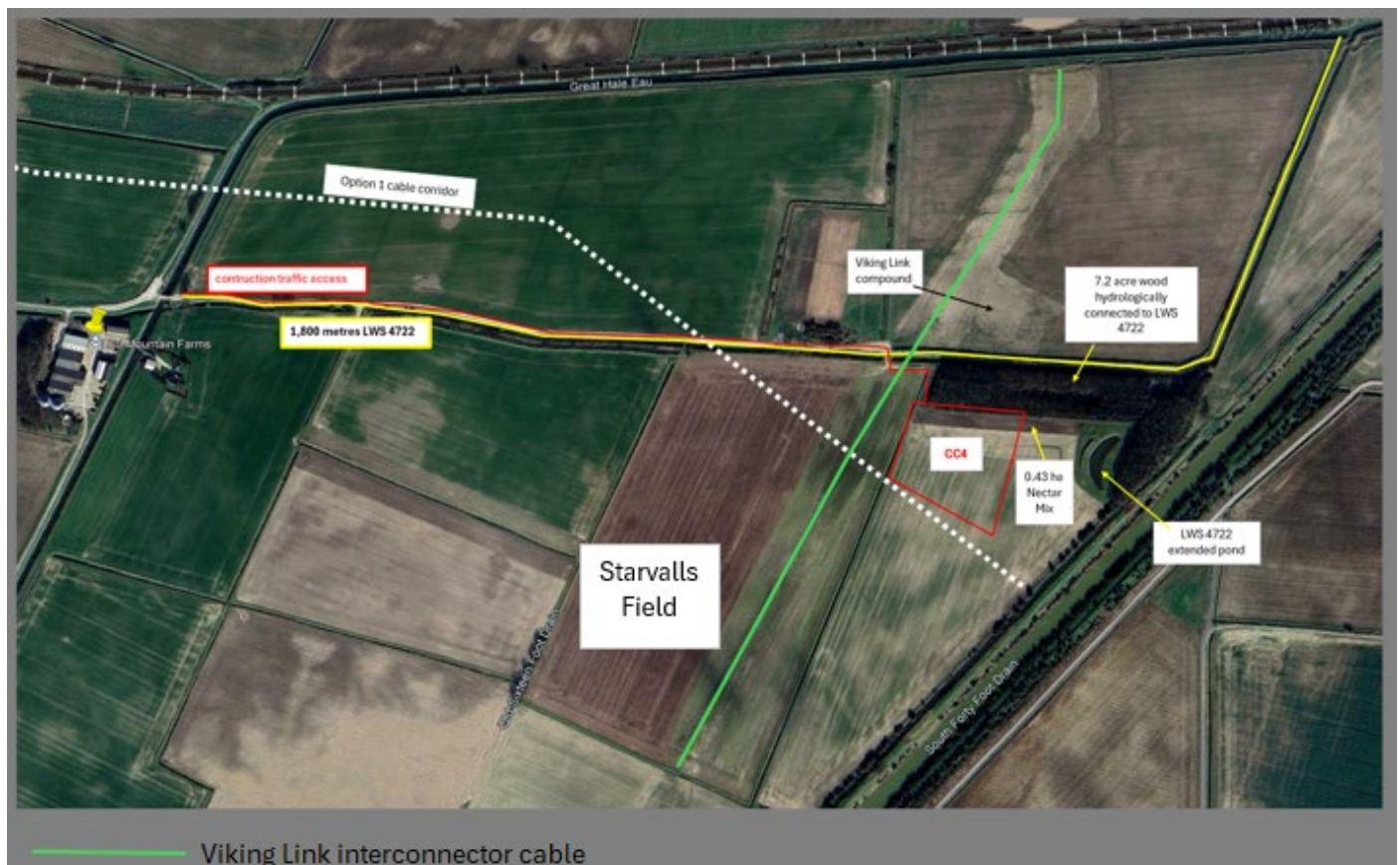
- the Applicant's 400 kV cable corridor and haul road alignment, which run longitudinally along LWS 4722;
- the location of Construction Compound CC4, including 0.43 ha of AB1 Nectar Flower Mix (G65, TF1941 7485) under Mid Tier Countryside Stewardship (Agreement 1458243, 2023–2027); and
- key drainage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

The exhibit illustrates that:

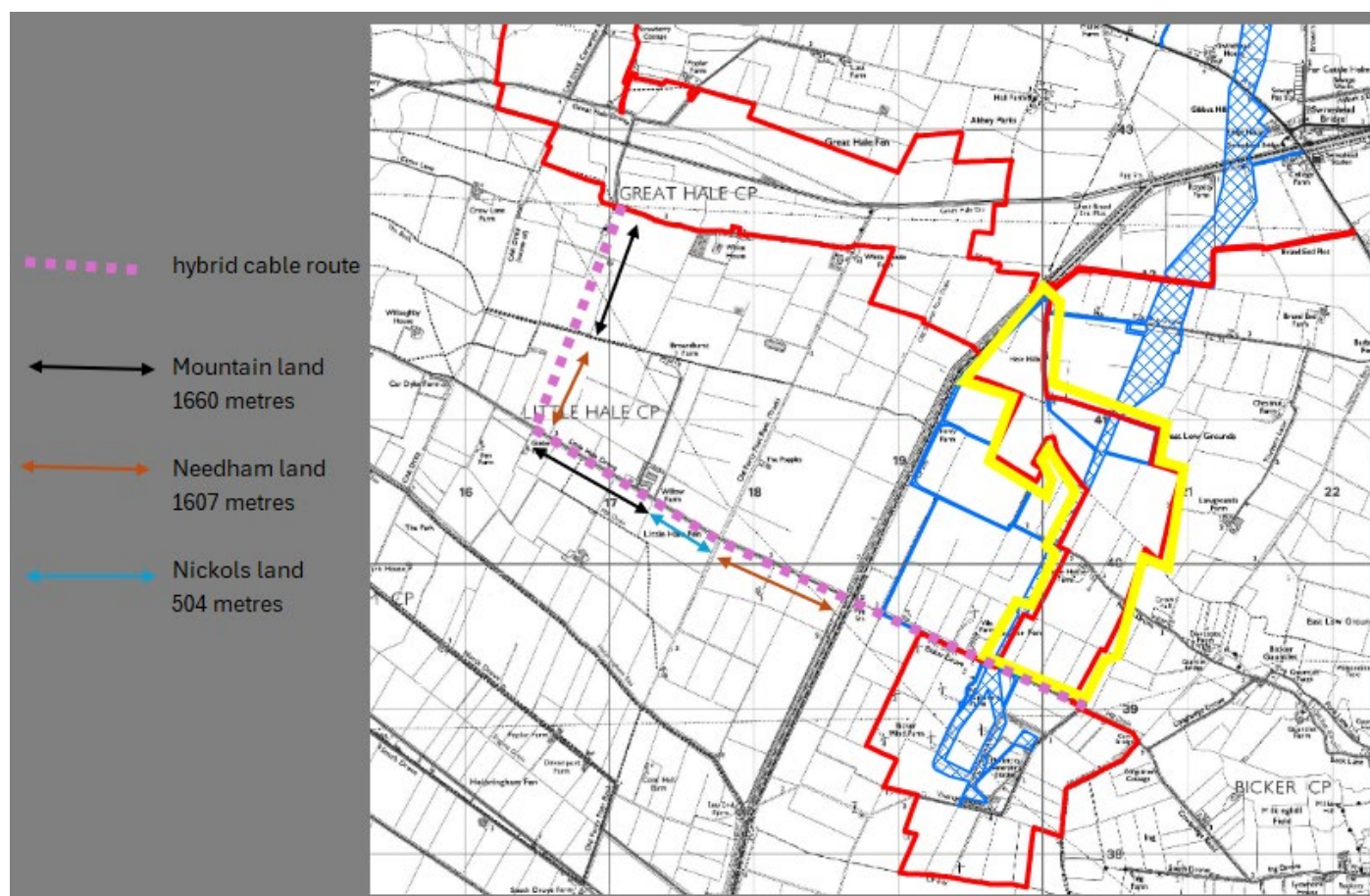
- the woodland block and LWS 4722 operate as a single, hydrologically linked ecological feature, not isolated parcels;
- the proposed compound and access track directly interface with both the LWS and the AB1 habitat parcel, intensifying disturbance within a sensitive corridor; and
- the Applicant's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

Source:

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



ExD4.18 Order limits east of the South Forty Foot showing landowners [yellow boundary] that would be avoided by the LCJMF hybrid corridor offer of going south to Little Hale Fen across LCJMF land and east to Bicker Drove and into Bicker substation point of connection.



Bicker Drove east of the South Forty Foot

