

## Beacon Fen Energy Park – Development Consent Order

Application Reference: EN010193

Submitted by: LCJ Mountain Farms Ltd (Interested Party Ref: [REDACTED])

On behalf of: LCJ Mountain Farms Ltd and, if permitted, [REDACTED]

(Interested Party Ref: [REDACTED])

Document: Exhibits Volume (**Ex6.1–Ex6.27** and old D4 exhibits)

Deadline: Deadline 1 (D6) –12.01.2026

Author: [REDACTED], Director, LCJ Mountain Farms Ltd

Email: [REDACTED]

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### Purpose

This Exhibits Volume accompanies **LCJM’s Written Representation submitted at Deadline 6 (D6)**. It compiles, in a single paginated document, all supporting evidence (**ExD6.1–ExD6.27**) referenced throughout the D6 Written Representation. The exhibits include contemporaneous correspondence, maps, plans, technical material, ecological evidence, and overlays relevant to LCJM’s case (as referenced in the Written Representation).

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### Structure

- **Pages 2–3** – Exhibits Index (table of contents for **ExD6.1–ExD6.27**).
  - **Pages 4 onward** – Exhibits presented in numerical order (each exhibit starting on a new page, labelled with its exhibit number and title).
  - Pagination corresponds to the Index page references (and will be updated if any additional exhibits are inserted).
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### Important

This volume contains **evidence only**. All commentary, interpretation, and submissions (i.e., “what this shows” and the conclusions LCJM invites the ExA to draw) are contained in **LCJM’s D6 Written Representation**. The exhibits should be read alongside the relevant sections and exhibit references in that document.

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**Exhibits Main**

**ExD6.1** Evidence of 420 minutes of repeated attempts to speak to Low Carbon and Ardent when the Option 1 cable route corridor through LCJM was announced with no response. The full spreadsheet was submitted at D4.1 showing 65 hours and 16 minutes from 08.05.23 to 07.02.25.

from 18.05.23	Start - Sydney Time	Finis h	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		Ardent		Email	10	5	5		20	
05.08.23	01:20	01:35		Ardent		Email	15				0	
05.08.23	01:20	01:23		Brown and Co		Email	5	5	5		15	
04.08.23	02:23	02:43		Brown and Co		Email	15	15	15		45	
05.08.23	02:24	02:30		Brown and Co		Email	5				5	
15.08.23	17:05	17:35		Low Carbon		Email	30	5	5		40	No
18.08.23				Low Carbon		Teleph	5				5	No
18.08.23				Low Carbon		Teleph	5				5	No
18.08.23				Ardent		Teleph	5				5	No
18.08.23				Ardent		Teleph	5				5	No
18.08.23	19:24	19:54		Low Carbon		Email	30	30	30		90	No
18.08.23				Low Carbon		Teleph	5				5	No
18.08.23				Ardent		Teleph	5				5	No
18.08.23	20:30			Low Carbon		Email	5	5	5		15	
18.08.23	20:35			Low Carbon		Email	5				5	No
19.08.23	02:10			Low Carbon		Email	5				5	No
19.08.23	18:14			Brown and Co		Email	5	5	5		15	
22.08.23	09:31			Low Carbon		Email	5	5	5		15	
22.08.23	20:06			Low Carbon		Email	50	10	10		70	No
22.08.23	21:04			Mishoons		Email	25	25	25		75	
22.08.23	15:5			Ardent		Email	5				5	
22.08.23	02:53			Ardent		Email	10				10	
24.08.23	16:05			Mishoons		Email	10	10	10		30	
28.08.23	16:04			Low Carbon		Email	20	20	20		60	No
28.08.23	16:54			Low Carbon		Email	20	20	20		60	No
30.08.23	17:44			Brown and Co		Email	20	20	20		60	
30.08.23	18:01			Brown and Co		Email	10	10	10		30	
30.08.23	18:13			Brown and Co		Email	5				5	
30.08.23	04:02			Brown and Co		Email	40	40	40		120	
31.08.23	15:13			Brown and Co		Email	40	40	40		120	
31.08.23						meeting	60	60	60		180	
13.09.23				Ardent		Teleph one	5				5	
13.09.23	003:05			Ardent		Email	15	15	15		45	
13.09.23	20:18			Low Carbon		Email	20	20	20		60	No
28.09.23	19:49			Mishoons			20	20	20		60	
10.11.23				Brown and Co		Whatsa	5				5	

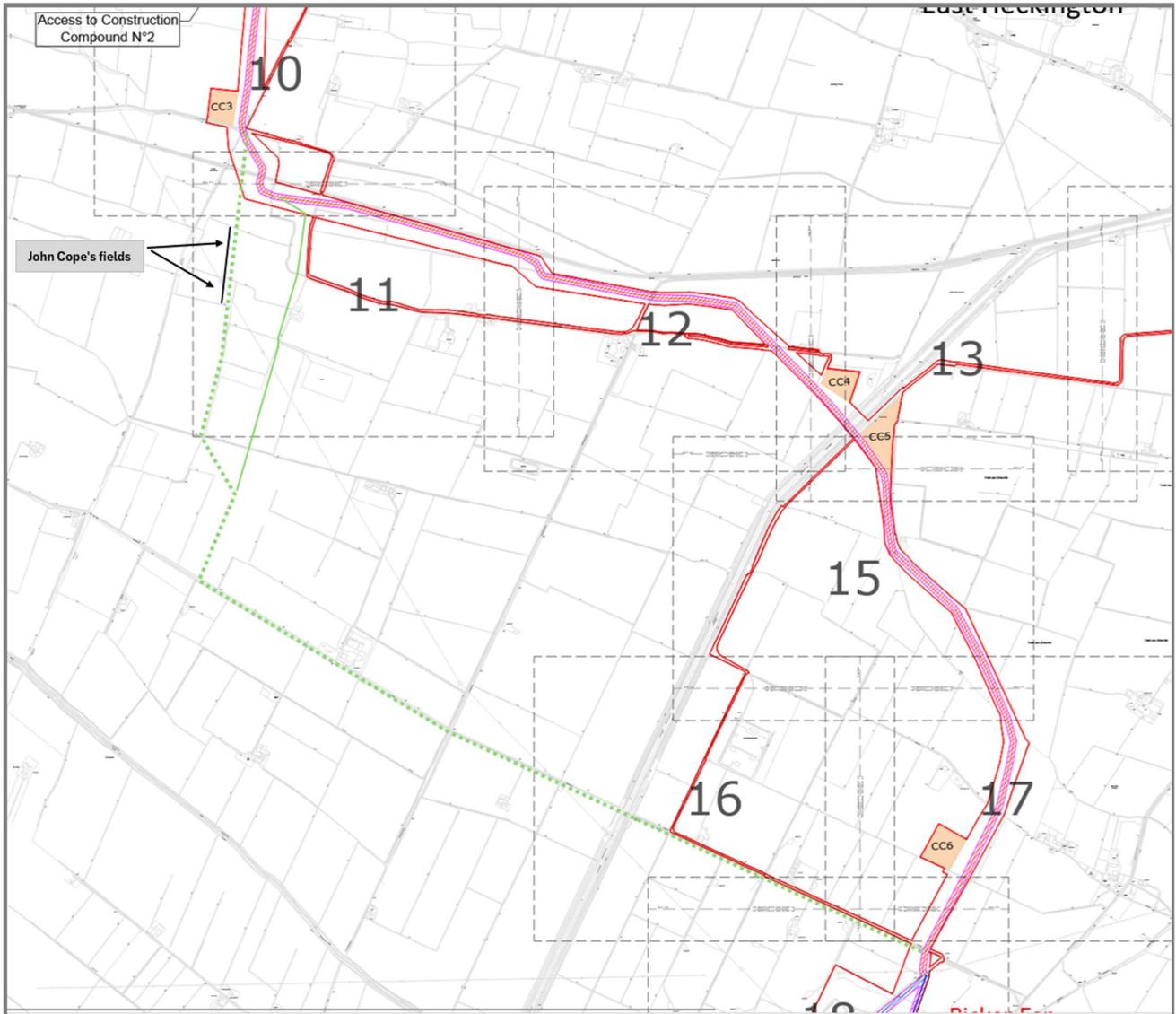
**ExD6.2** The LCJM Hybrid cable route [yellow dotted line] collecting all 618 acres of PV and BESS land within 2.5 km of Bicker substation and making a continuous block with a single row of PV across the 800 metres (red line below).

**Diagram 1**

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



**Ex6.3** Diagram showing green dotted line going through [redacted] fields [black solid line only) on which LCJM is the tenant, thereby making an even shorter route which is relevant if not collecting LCJM's Aug 2023 618 acres of PV and BESS.



ExD6.4 Diagram showing 833 metres across [redacted] land [green line]



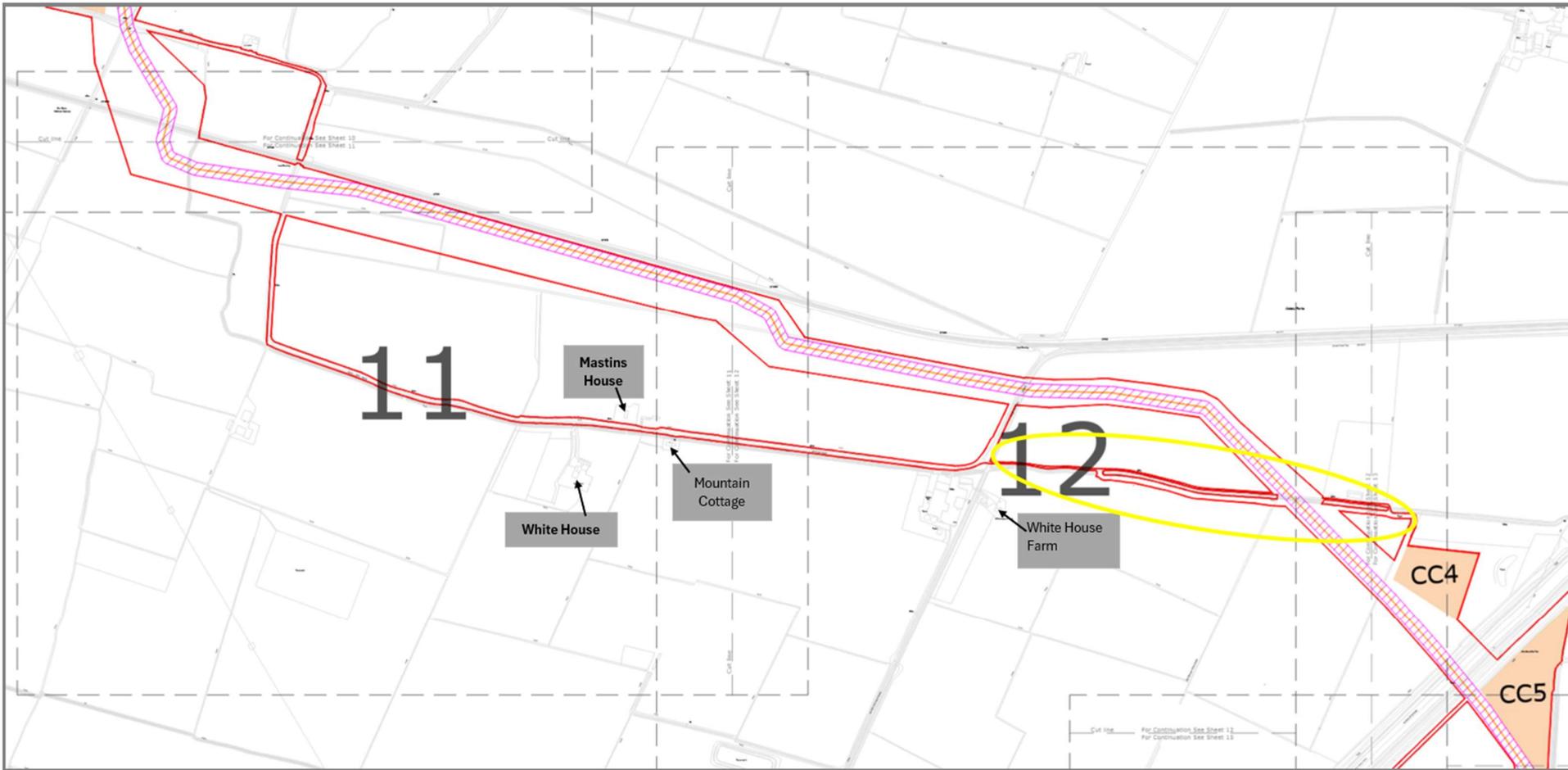
Google Earth - New Path x

Name:

Description Style, Color View Altitude Measurements

Length: 833 Meters v

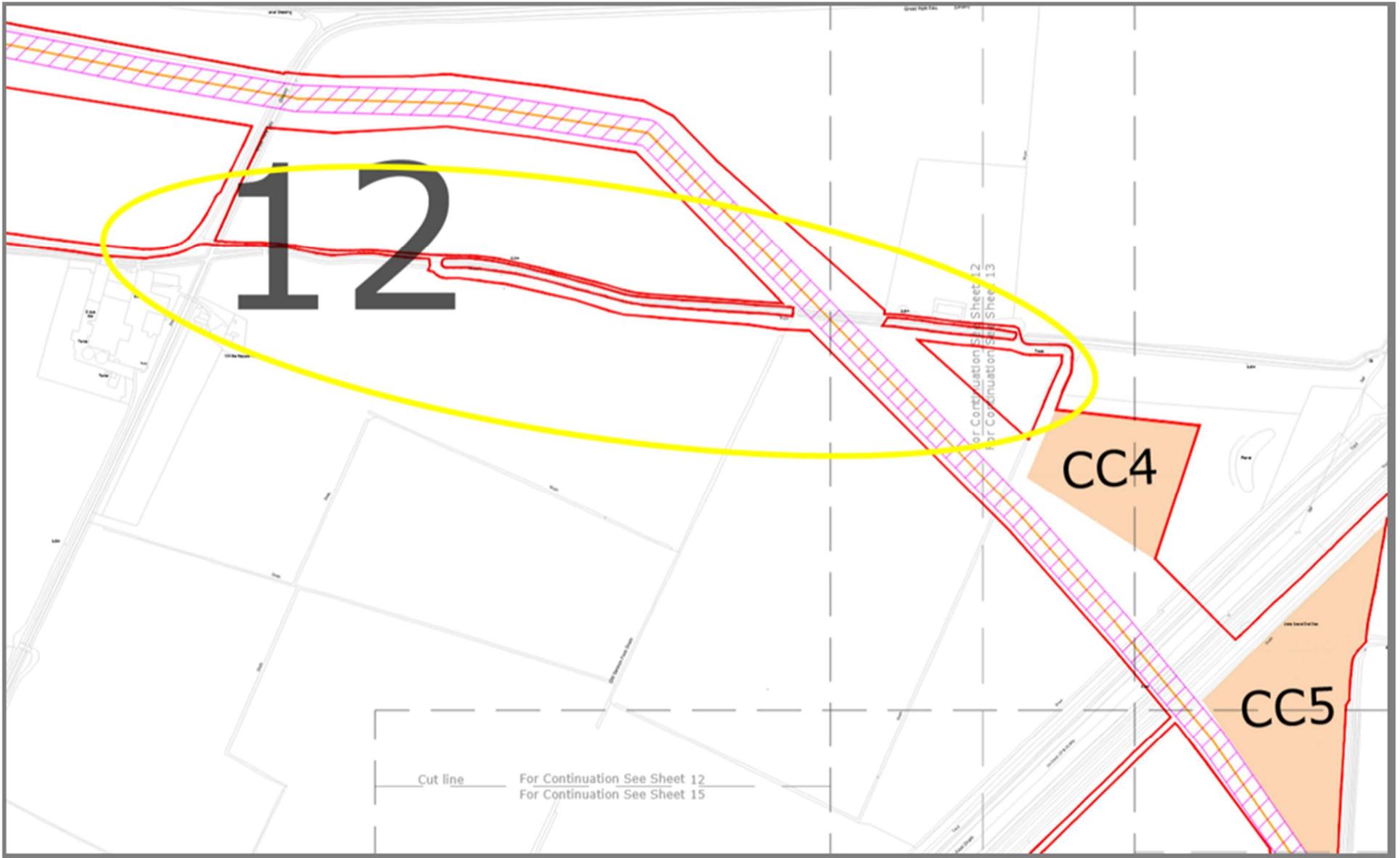
**ExD6.5** Diagram showing the exclusion of the haul road and construction compounds which absolves major impact on four residential receptors and 1647 metres of double occupation (north and south side) of LWS 4722 (yellow oval).



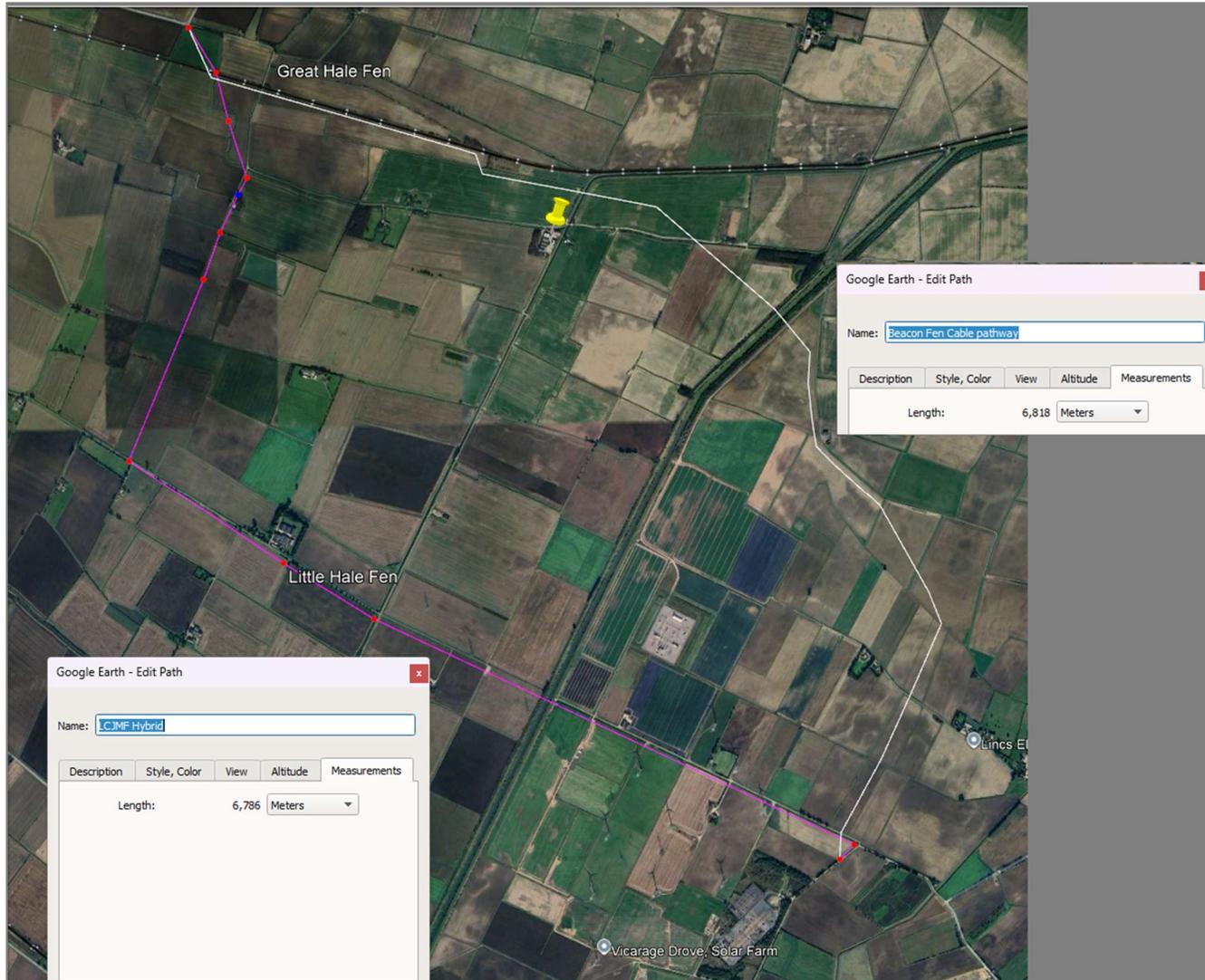
ExD6.6 Diagram showing 1,647 metres of double occupation (north and south – red line below) of LWS 4722



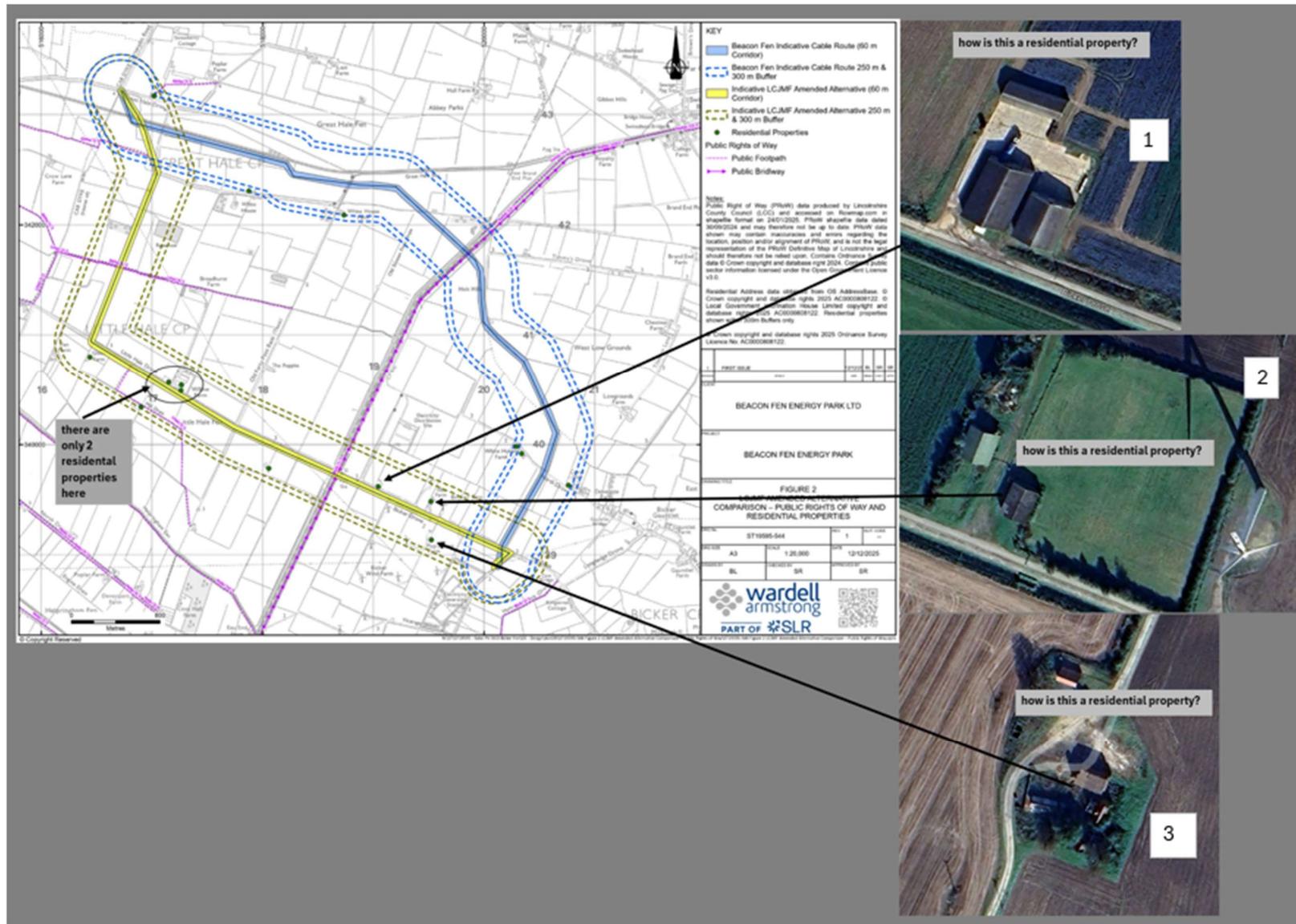
**ExD6.7** Diagram showing Low Carbon's own construction haul road's double occupation (north and south sides) of LWS 4722 – totalling 1,647 metres.



**EX 6.8** Diagram showing evidence of LCJM Hybrid being at least 32 metres shorter [6,786 metres versus 6,818 metres] than the Beacon Fen cable route and avoiding all north / south drainage every 21 yards in Great Hale Fen on LCJM's fields



**Ex D6.9** Diagram showing the incorrect counting of 3 residential dwellings at Willow Farm [Nickols] when there are 2, alongside incorrectly counting 3 farm buildings as residential dwellings east of the South Forty Foot



**Ex D6.10a** – On the ground photographs of **Farm Buildings Number 1** [Ex D6.9] showing them not to be a residential property [taken by [REDACTED] 8<sup>th</sup> January 2026]



Ex D6.10b On the ground photographs of **Farm Buildings Number 1** [Ex D6.9] showing them not to be a residential property [taken by [REDACTED] 8<sup>th</sup> January 2026



Ex D6.10c Desktop obtained google Image of Site 1 [Ex D6.9] - showing clearly not a residential dwelling though claimed to be so by Low Carbon



**Ex D6.11a** – On the ground photographs of **Farm Buildings Number 2** [see Ex D6.9] showing them not to be a residential property [taken by [REDACTED] 9<sup>th</sup> January 2026]



Ex D6.11b Desktop obtained google Image of Site 2 [see Ex D6.9] - showing clearly not a residential dwelling though claimed to be so by Low Carbon



**Ex D6.12a** – On the ground photographs of **Farm Buildings Number 3** [see Ex D6.9] showing them not to be a residential property [taken by [REDACTED] 9<sup>th</sup> January 2026]



**Ex D6.12b** On the ground photographs of **Farm Buildings Number 3** [see Ex D6.9] showing them not to be a residential property [taken by [REDACTED] 9<sup>th</sup> January 2026]



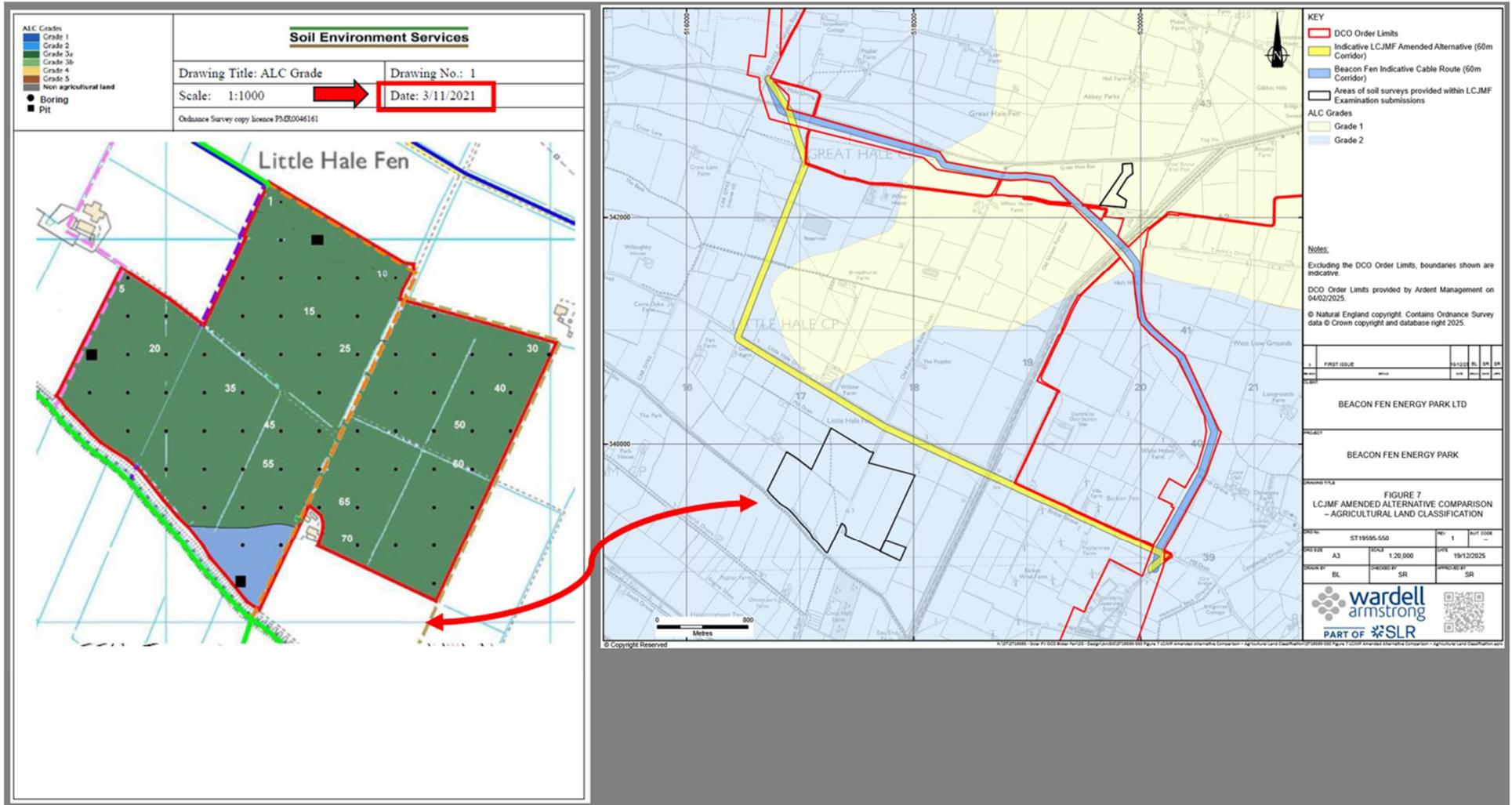
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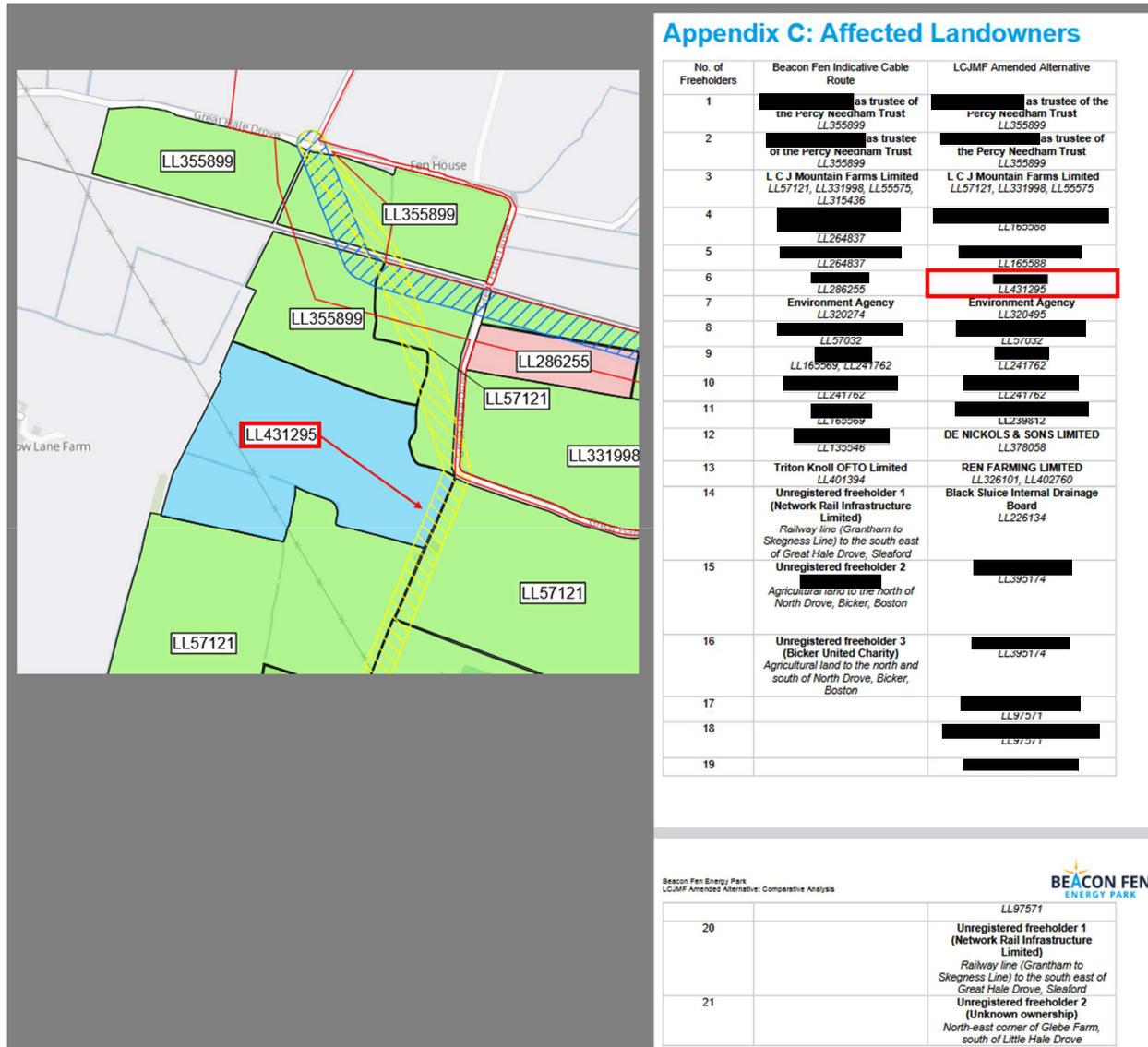
**Ex D6.12d** Desktop obtain google Image of **Site 3** [see Ex D6.9] - showing clearly not a residential dwelling though claimed to be so by Low Carbon



**Ex D6.13** Agricultural Land Classification 03.11.2021 showing 96% Grade 3a land in Little Hale Fen next to LCJM Hybrid route. LCJM thinks that the route area to the west of this site is even lower (having farmed the area for nearly 30 years) and might be “non BMV” Grade 3b and is getting this soil sampled.



**Ex D6.14** Counting LL431295 [REDACTED] is not correct unless shortening the route across his land as per Ex D6.4. The straddling of LL57121 and LL431295 is a good example of the applicant subjectively creating criteria to diminish the LCJM Hybrid comparison properties



Ex D6.15 [REDACTED] as Director of REN Farming

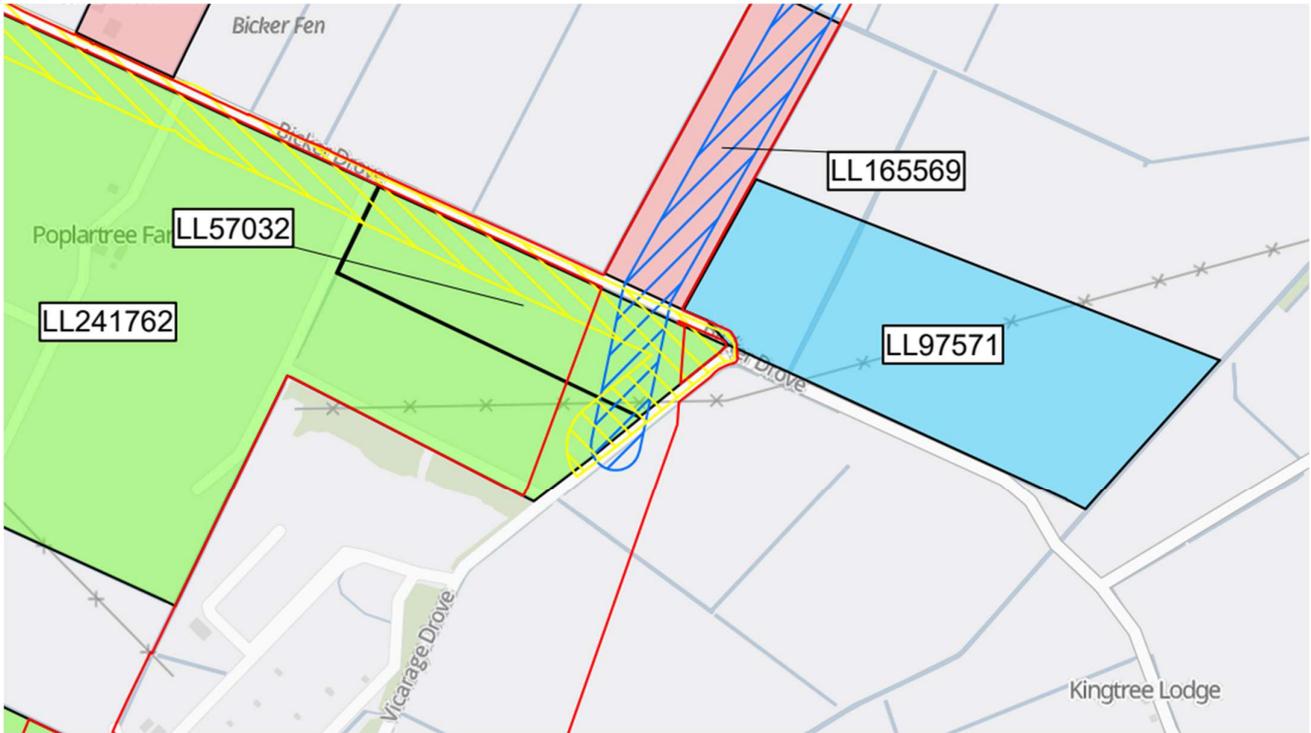
**REN FARMING LIMITED**

**COMPANY INFORMATION  
FOR THE YEAR ENDED 31 MARCH 2025**

**DIRECTORS:**



Ex D6.16a Incorrect inclusion of LL97571 three times in Appendix C: Affected Landowners (see below Ex D6.16b)



### Appendix C: Affected Landowners

No. of Freeholders	Beacon Fen Indicative Cable Route	LCJMF Amended Alternative
1	██████████ as trustee of the Percy Needham Trust LL355899	██████████ as trustee of the Percy Needham Trust LL355899
2	██████████ as trustee of the Percy Needham Trust LL355899	██████████ as trustee of the Percy Needham Trust LL355899
3	L C J Mountain Farms Limited LL57121, LL331998, LL55575, LL315436	L C J Mountain Farms Limited LL57121, LL331998, LL55575
4	██████████ LL264837	██████████ LL165588
5	██████████ LL264837	██████████ LL165588
6	██████████ LL286255	██████████ LL431295
7	Environment Agency LL320274	Environment Agency LL320495
8	██████████ LL57032	██████████ LL57032
9	██████████ LL165569, LL241762	██████████ LL241762
10	██████████ LL241762	██████████ LL241762
11	██████████ LL165569	██████████ LL239812
12	██████████ LL135546	DE NICKOLS & SONS LIMITED LL378058
13	Triton Knoll OFTO Limited LL401394	REN FARMING LIMITED LL326101, LL402760
14	Unregistered freeholder 1 (Network Rail Infrastructure Limited) <i>Railway line (Grantham to Skegness Line) to the south east of Great Hale Drive, Sleaford</i>	Black Sluice Internal Drainage Board LL226134
15	Unregistered freeholder 2 <i>Agricultural land to the north of North Drive, Bicker, Boston</i>	██████████ LL395174
16	Unregistered freeholder 3 (Bicker United Charity) <i>Agricultural land to the north and south of North Drive, Bicker, Boston</i>	██████████ LL395174
17		██████████ LL97571
18		██████████ LL97571
19		██████████
Beacon Fen Energy Park LCJMF Amended Alternative: Comparative Analysis		 LL97571
20		Unregistered freeholder 1 (Network Rail Infrastructure Limited) <i>Railway line (Grantham to Skegness Line) to the south east of Great Hale Drive, Sleaford</i>
21		Unregistered freeholder 2 (Unknown ownership) <i>North-east corner of Glebe Farm, south of Little Hale Drive</i>

**Ex D6.17**

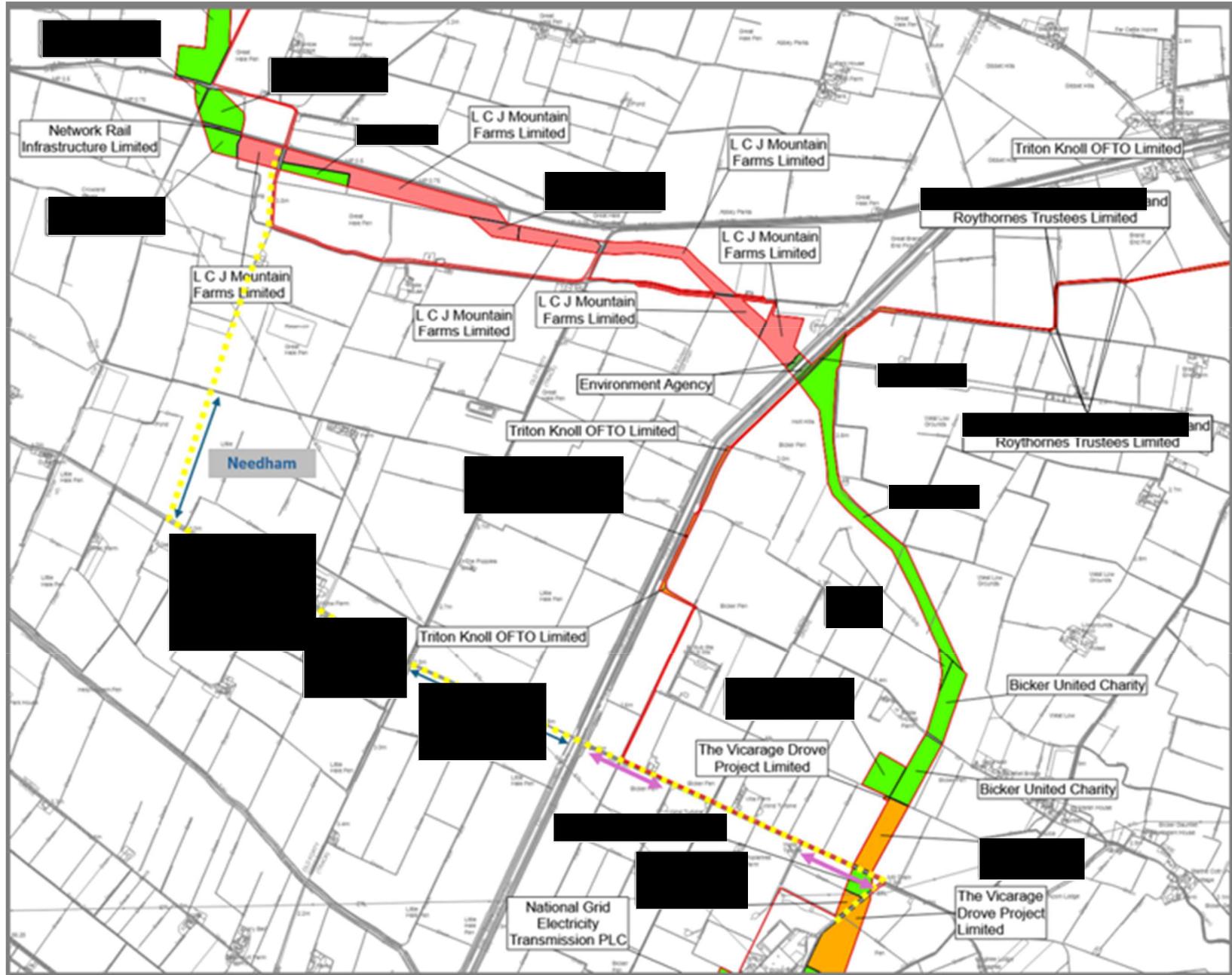
**Simplified map** of affected landowners on LCJM Hybrid Route –

- 1) Percy Needham Trust; [REDACTED] - affected by both routes
- 2) [REDACTED]
- 3) Nickols
- 4) [REDACTED] - affected by both routes
- 5) LL395174 [REDACTED]
- 6) LL241762 [REDACTED] - affected by both routes

**Maximum 3 new affected landowners [bold above] and relieving 10 landowners** from the Beacon Fen cable route; namely –

- 1) [REDACTED] - LL431295
- 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

**Net reduction of 7 affected landowners.**



Ex D6.18 Only LL395174 [Number 8 below] and LL241762 [Number 4 below] to be confirmed by Brown & Co.

## Appendix C: Affected Landowners

No. of Freeholders	Beacon Fen Indicative Cable Route	LCJMF Amended Alternative
1	██████████ as trustee of the Percy Needham Trust LL355899	██████████ as trustee of the Percy Needham Trust LL355899
2	██████████ as trustee of the Percy Needham Trust LL355899	██████████ as trustee of the Percy Needham Trust LL355899
3	L C J Mountain Farms Limited LL57121, LL331998, LL55575, LL315436	L C J Mountain Farms Limited LL57121, LL331998, LL55575
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7	Environment Agency LL320274	Environment Agency LL320495
8	██████████ LL57032	██████████ LL57032
9	██████████ LL165569, LL241762	██████████ LL241762
10	██████████ LL241762	██████████ LL241762
11	██████████ LL165569	██████████ LL239812
12	██████████ LL135546	DE NICKOLS & SONS LIMITED LL378058
13	Triton Knoll OFTO Limited LL401394	REN FARMING LIMITED LL326101, LL402760
14	Unregistered freeholder 1 (Network Rail Infrastructure Limited) <i>Railway line (Grantham to Skegness Line) to the south east of Great Hale Drive, Sleaford</i>	Black Sluice Internal Drainage Board LL226134
15	Unregistered freeholder 2 <i>Agricultural land to the north of North Drive, Bicker, Boston</i>	██████████ LL395174
16	Unregistered freeholder 3 (Bicker United Charity) <i>Agricultural land to the north and south of North Drive, Bicker, Boston</i>	██████████ LL395174
17		██████████ LL97571
18		██████████ LL97571
19		██████████
<p>Beacon Fen Energy Park LCJMF Amended Alternative: Comparative Analysis</p> <p style="text-align: right;"><b>BEACON FEN ENERGY PARK</b></p>		
20		Unregistered freeholder 1 (Network Rail Infrastructure Limited) <i>Railway line (Grantham to Skegness Line) to the south east of Great Hale Drive, Sleaford</i>
21		Unregistered freeholder 2 (Unknown ownership) <i>North-east corner of Glebe Farm, south of Little Hale Drive</i>

1

2

3

4

5

6

7

8

Mountain SSAS

Mountain SSAS

**Ex D6.19** UK Government Map of Historic and Archaeological Features on LCJM [coloured fields] and surrounds – LCJM Hybrid route, Great Hale Fen, showing no features [yellow dotted line]

## Sustainable Farming Incentive

### Information about historic and archaeological features for SBI 107629756 generated on 11/11/2023

This document identifies any known historic and archaeological features on the land parcels currently linked to your Single Business Identifier (SBI). If you are entering an area with a land parcel that contains historic and archaeological features into a SFI agreement, please use this SFI HEFER to:

- identify where Scheduled Monument Consent may be required before you carry out the SFI actions; and
- ensure the activities you do to complete the SFI actions comply with the requirements listed in this SFI HEFER.

This document only applies to the land parcels linked to your SBI at the time you requested this SFI HEFER. You will need to request another SFI HEFER if:

- you have added new land parcels to your SBI since you requested this SFI HEFER; or
- you enter land parcels into additional SFI actions in the future.



Department  
for Environment  
Food & Rural Affairs

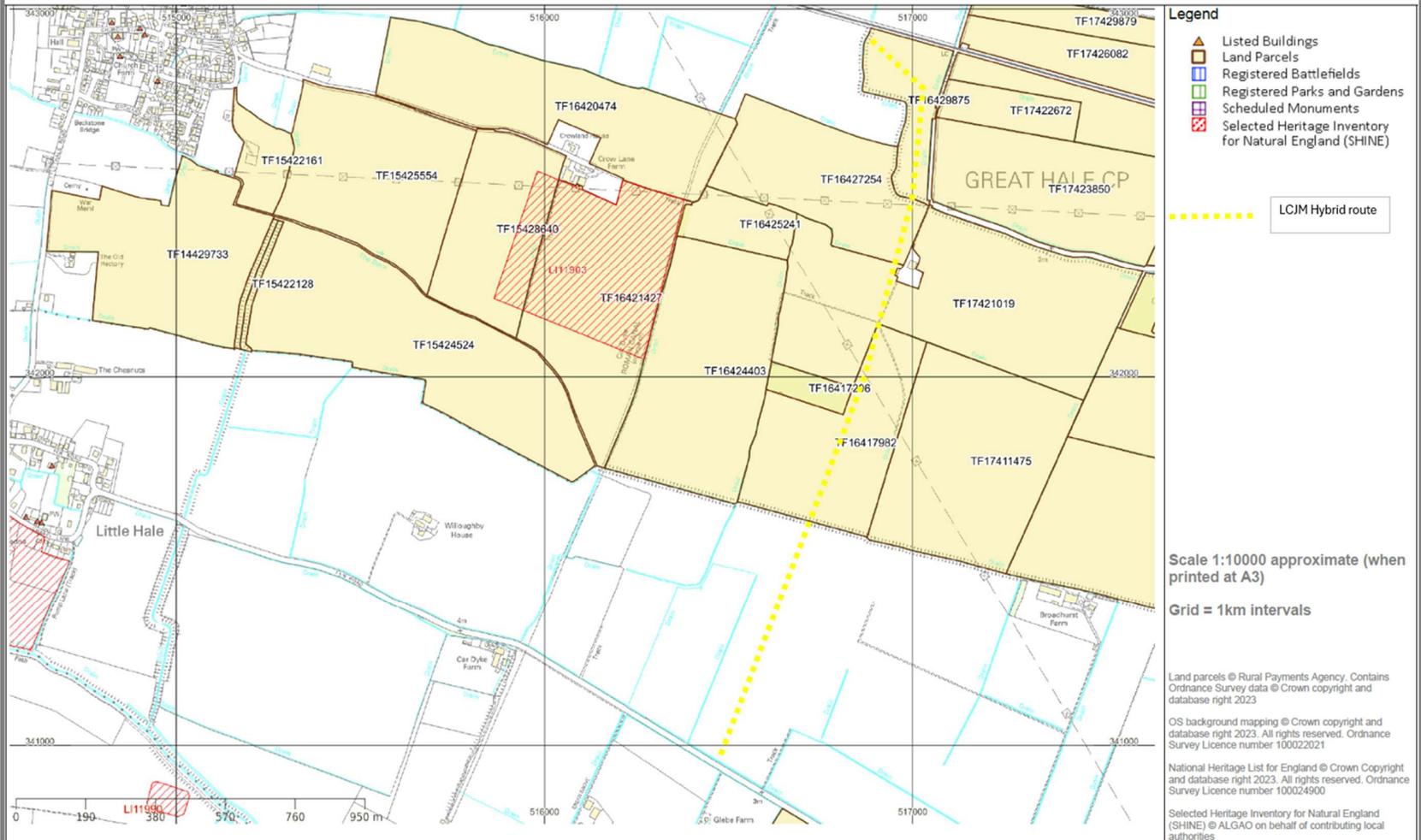


Historic England

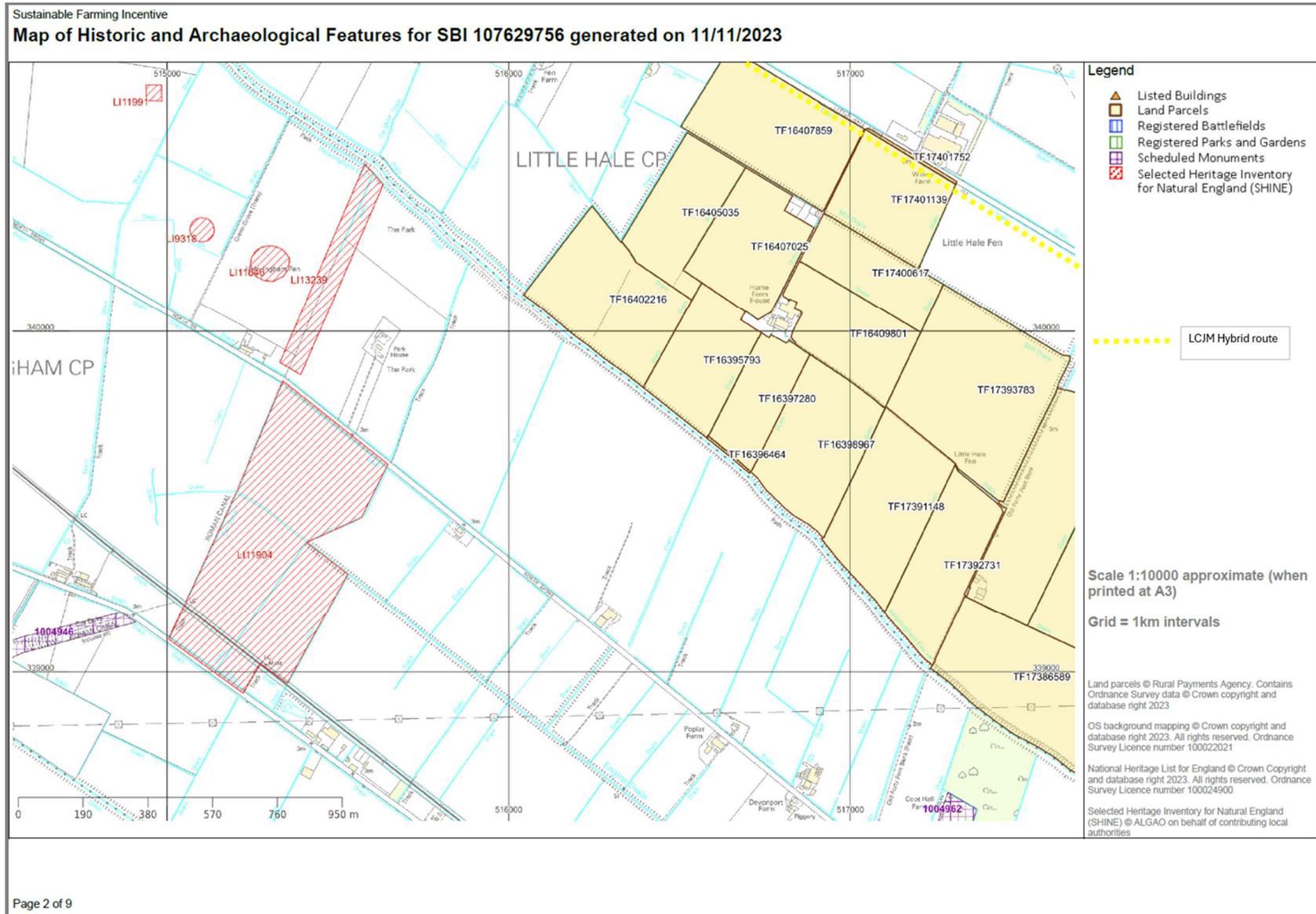


Forestry Commission

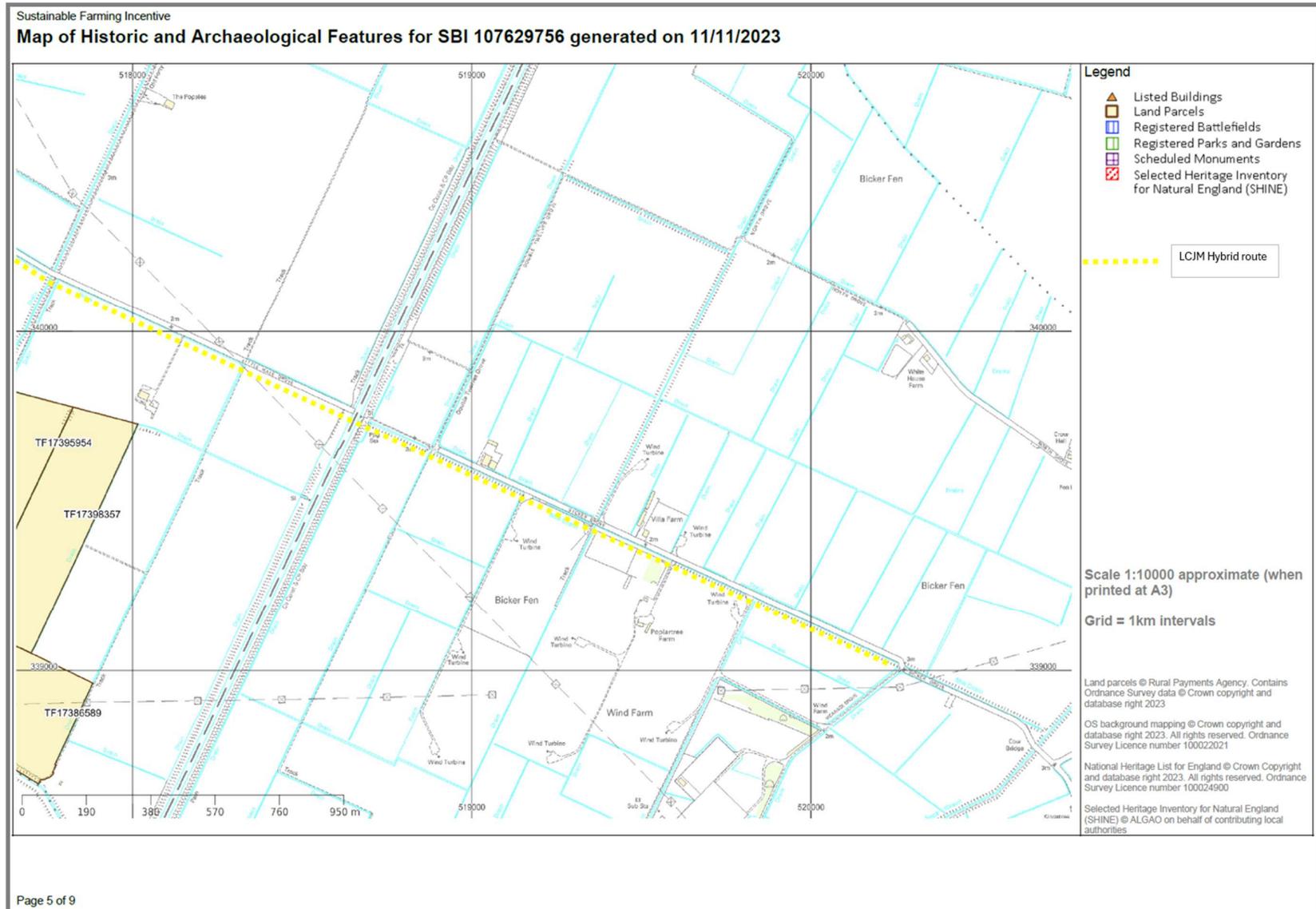




**Ex D6.20** UK Government Map of Historic and Archaeological Features on LCJM [coloured fields] and surrounds – LCJM Hybrid route, Little Hale Fen, **Part 1**, showing no features [yellow dotted line]

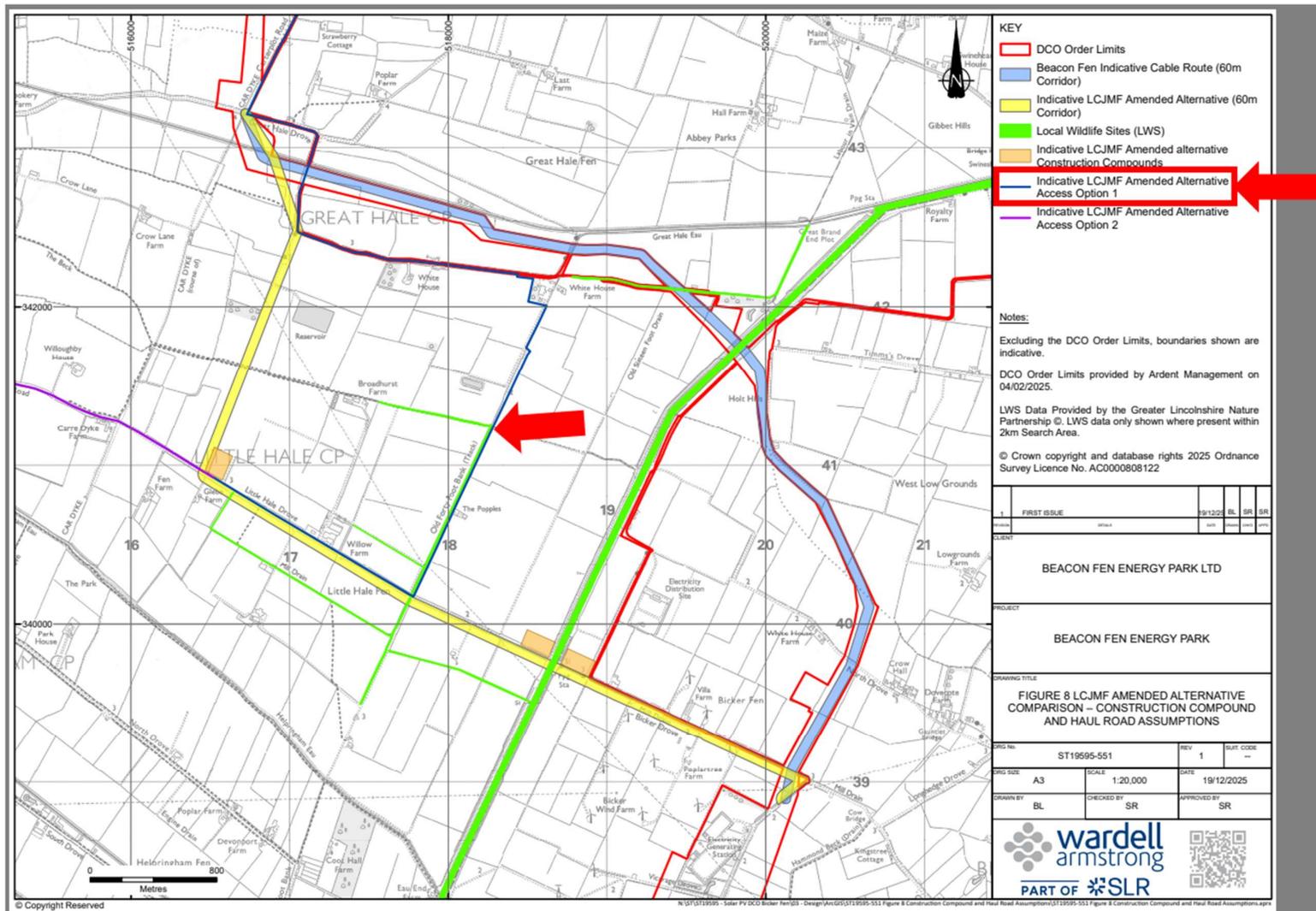


**Ex D6.21** UK Government Map of Historic and Archaeological Features on LCJM [coloured fields] and surrounds – LCJM Hybrid route, Little Hale Fen, **Part 2**, showing no features [yellow dotted line]

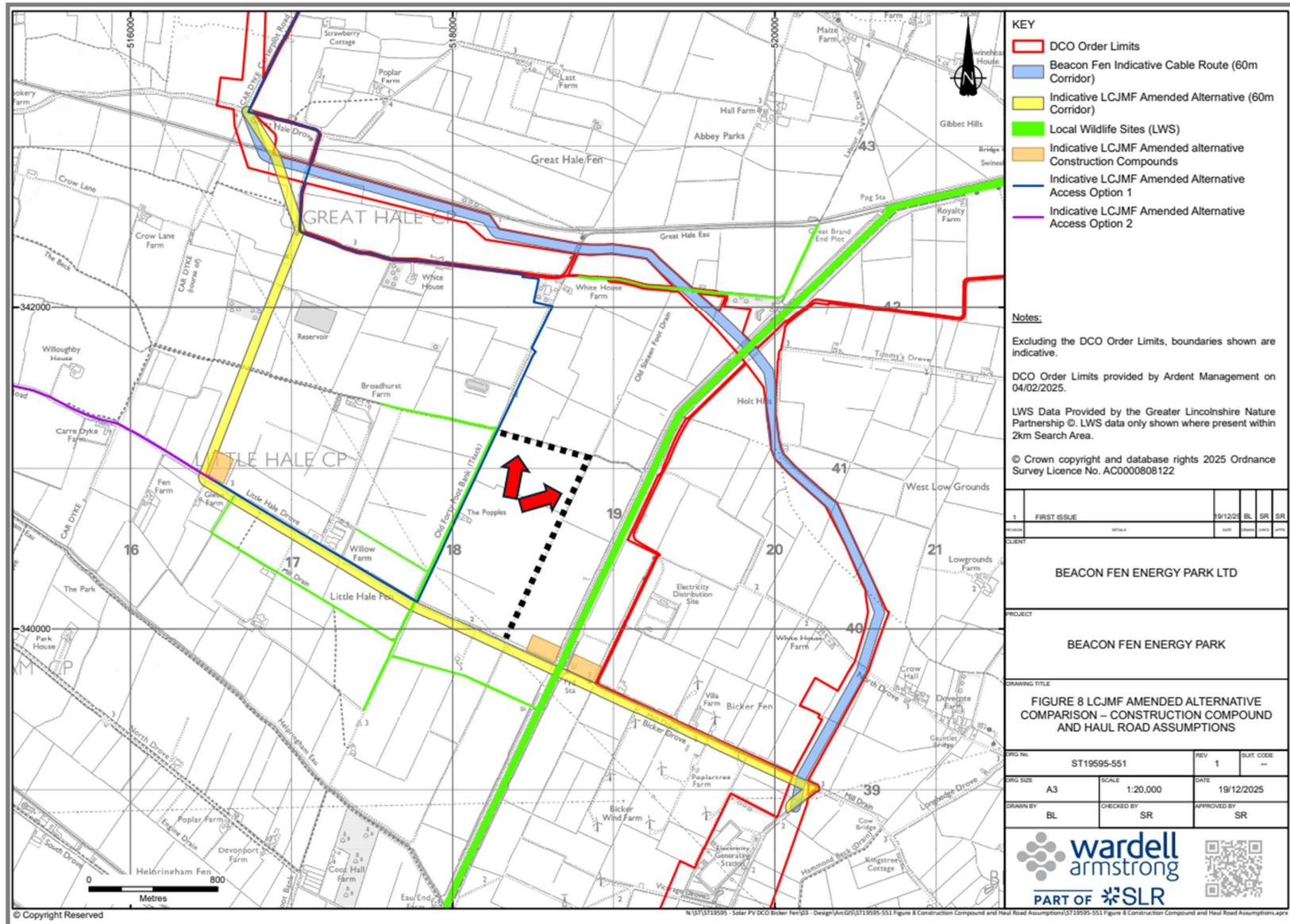




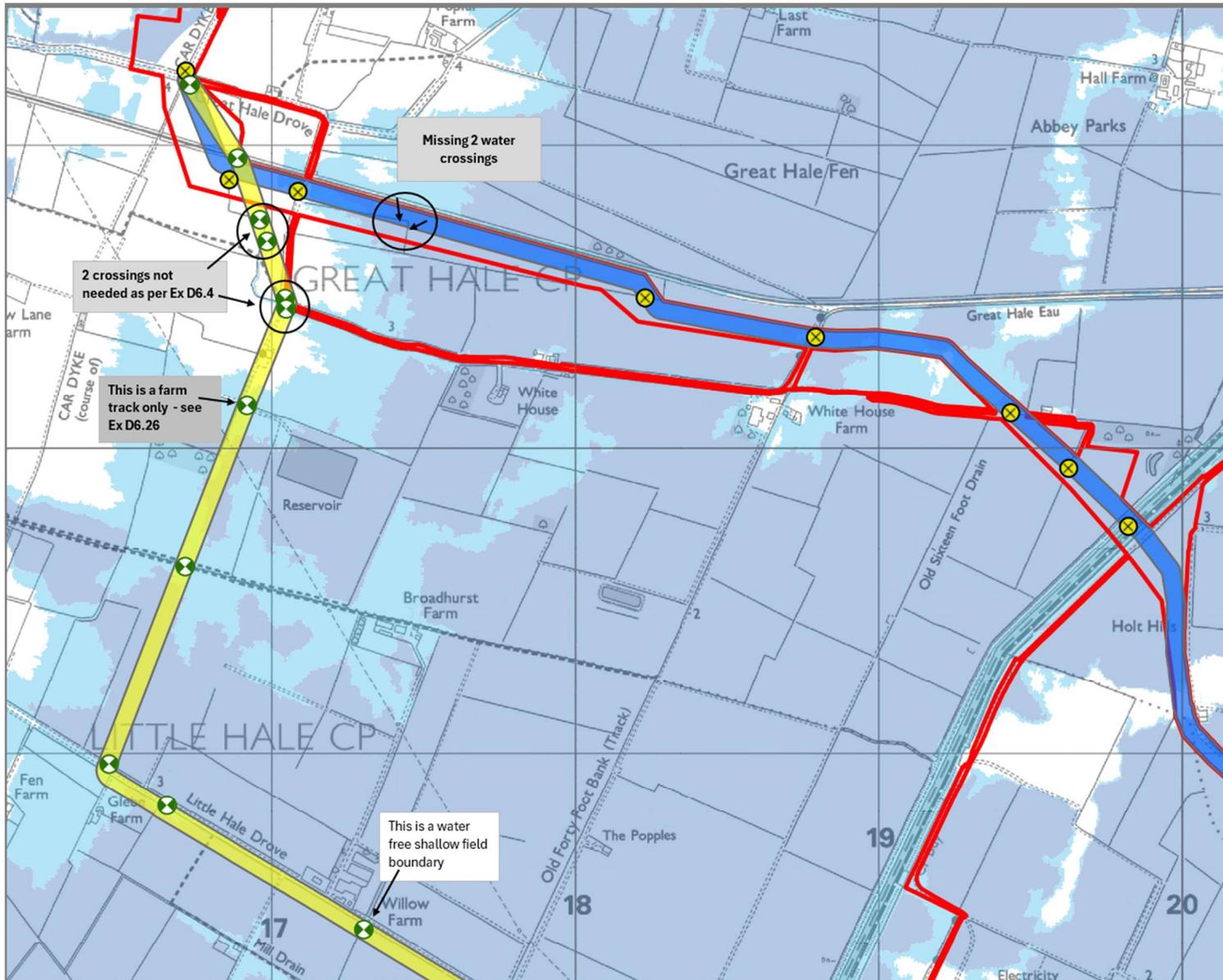
**Ex D6.23** The Applicant has chosen an internal alignment (“Access Option 1”) that maximises “parallel within 50m of an LWS” lengths and then **deploys those inflated figures to load ecological interaction onto the LCJM Hybrid**. That is a selective and self-serving evidential assumption, and it further undermines the reliability and weight of Table 2 as a comparator.



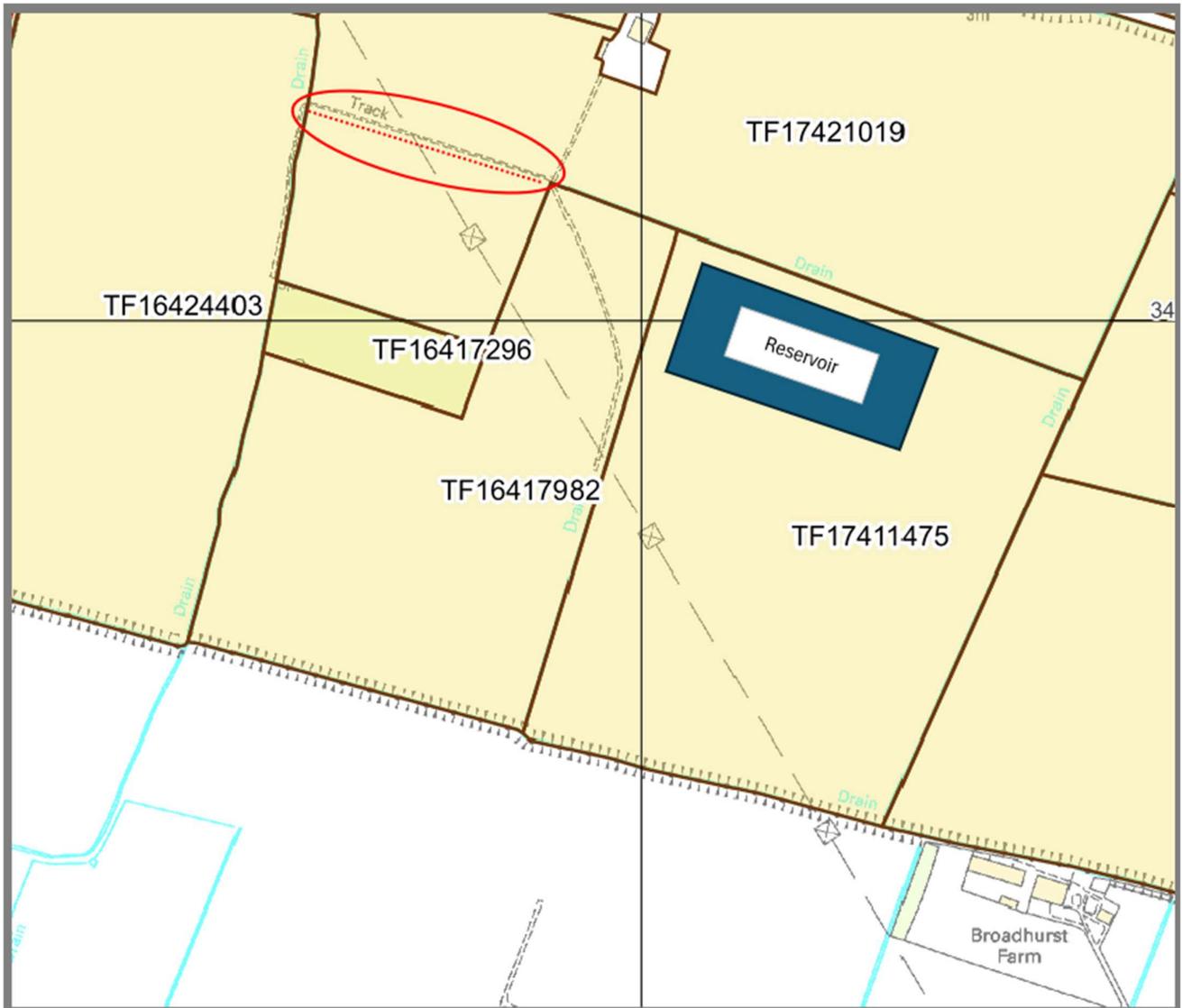
**Ex D6.24** Map showing - beyond “Indicative LCJM Amended Alternative Access Option 2” – the purple line on Little Hale Drive - **why would the applicant not use the black dashed line [red arrows] to avoid all longitudinal interaction with the Great Hale Eau LWS?**



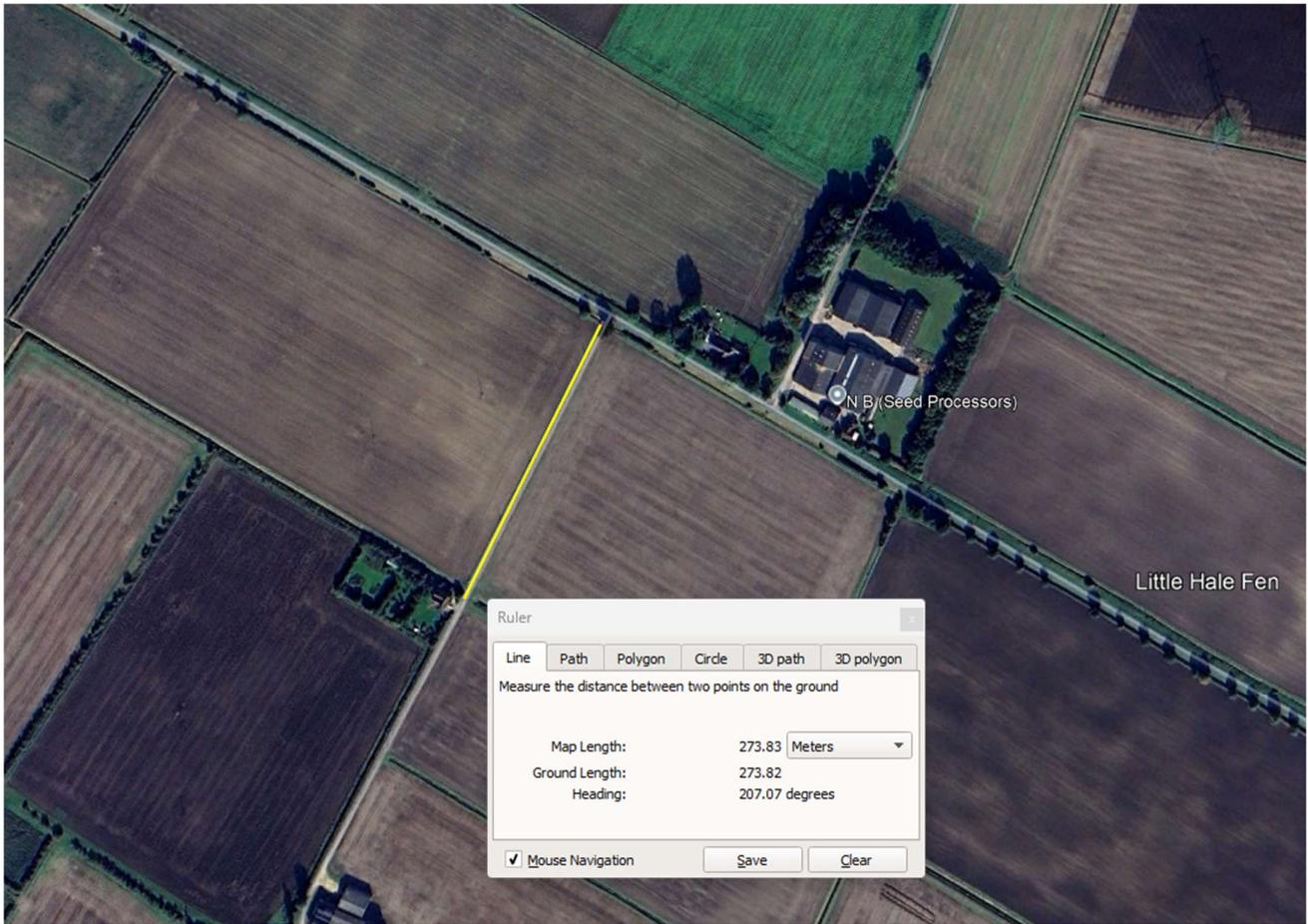
Ex D6.25 The applicant loads water crossings onto some areas of the LCJM Hybrid route [see Ex D6.4] while misses crossings on its own route – see annotations below



Ex D6.26 – Map showing farm track only [red oval] and incorrect inclusion by the Applicant as a watercourse crossing



Ex D6.27 Residential dwelling counted for noise on LCJM Hybrid route at 273 metres (versus 250 metre catchment)



## Previous Exhibits

**D4.1** 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	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		Ardent		Email	10	5	5		20	
05.08.23	01.20	01.35		Ardent		Email	15				0	
05.08.23	01.20	01.25		Brown and Co		Email	5	5	5		15	
04.08.23	02.23	02.43		Brown and Co		Email	15	15	15		45	
05.08.23	02.24	02.30		Brown and Co		Email	5				5	
15.08.23	17.05	17.35		Low Carbon		Email	30	5	5		40	No
18.08.23				Low Carbon		Teleph	5				5	No
18.08.23				Low Carbon		Teleph	5				5	No
18.08.23				Ardent		Teleph	5				5	No
18.08.23				Ardent		Teleph	5				5	No
18.08.23	19.24	19.54		Low Carbon		Email	30	30	30		90	No
18.08.23				Low Carbon		Teleph	5				5	No
18.08.23				Ardent		Teleph	5				5	No
18.08.23	20.30			Low Carbon		Email	5	5	5		15	
18.08.23	20.35			Low Carbon		Email	5				5	No
19.08.23	02.10			Low Carbon		Email	5				5	No
19.08.23	18.14			Brown and Co		Email	5	5	5		15	
22.08.23	09.31			Low Carbon		Email	5	5	5		15	
22.08.23	20.06			Low Carbon		Email	50	10	10		70	No
22.08.23	21.04			Mishcons		Email	25	25	25		75	
22.08.23	15.5			Ardent		Email	5				5	
22.08.23	02.53			Ardent		Email	10				10	
24.08.23	16.05			Mishcons		Email	10	10	10		30	
28.08.23	16.04			Low Carbon		Email	20	20	20		60	No
28.08.23	16.54			Low Carbon		Email	20	20	20		60	No
30.08.23	17.44			Brown and Co		Email	20	20	20		60	
30.08.23	18.01			Brown and Co		Email	10	10	10		30	
30.08.23	18.13			Brown and Co		Email	5				5	
30.08.23	04.02			Brown and Co		Email	40	40	40		120	
31.08.23	15.13			Brown and Co		Email	40	40	40		120	

31.08.23						meeting	60	60	60			180	
13.09.23						Ardent Teleph one	5					5	
13.09.23	003.05					Ardent Email	15	15	15			45	
13.09.23	20.18					Low Carbon Email	20	20	20			60	No
28.09.23	19.49					Mishoons Email	20	20	20			60	
10.11.23						Brown and Co Whatsa	5					5	
11.11.23	09.21					Brown and Co Email	20	20	20			60	
15.11.23	16.13					Brown and Co Email	10	10	10			30	
17.11.23	06.43					Brown and Co Email	10	10	10			30	
17.11.23	14.51					Brown and Co Email	10					10	
25.11.23	12.49					Mishoons Email	60					60	
28.11.23	8.00					Mishoons Teams	30					30	
05.12.23	08.33					Brown and Co Email	20					20	
07.12.23	08.08					Mishoons and Email	6					6	
07.12.23	08.39					Brown & Co Email	12					12	
08.012.23	13.43					Mishoons Email	12					12	
09.12.23						Mishoons Email	12					12	
09.12.23	14.54					LCJMF Email	12	12	12			36	
08.12.23	13.43					Ardent Email	18	18	18			54	
12.12.23	07.17					Brown and Co + Mishoons Email	18					18	
13.12.23	11.08					Mishoons Email	18					18	
19.12.23	07.36					Mishoons Email	42					42	
19.12.23	09.13					Mishoons Email	24					24	
19.12.23	18.55					Mishoons Email	18					18	



#### Ex D4.11

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

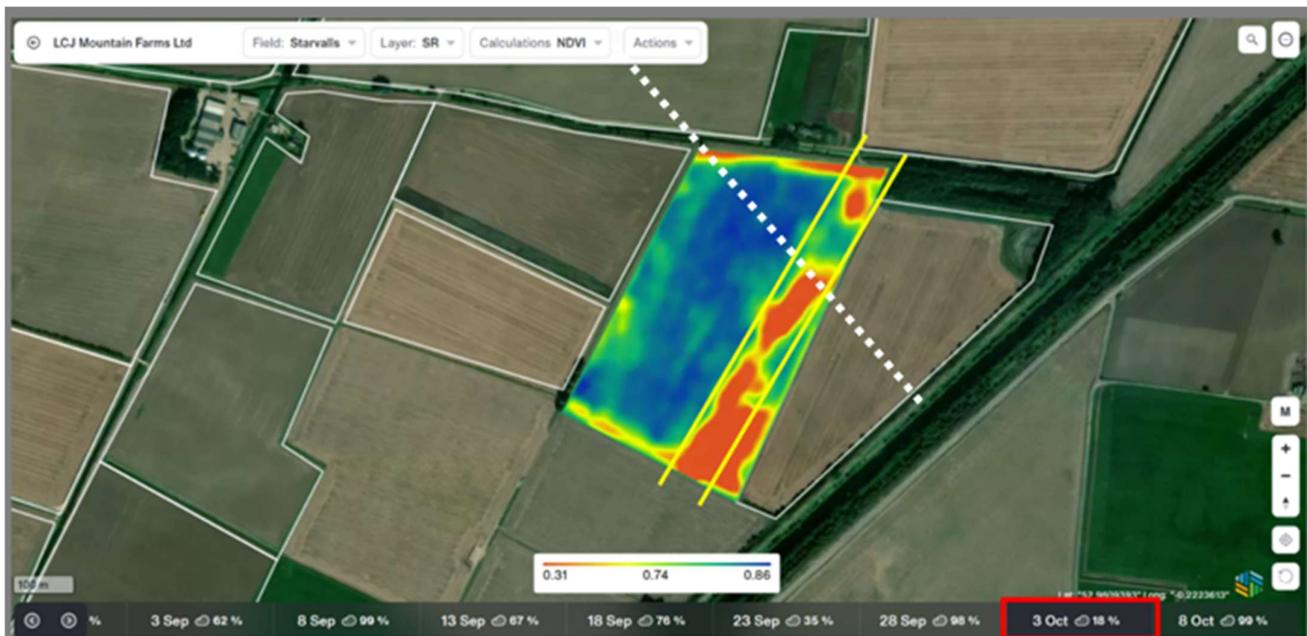
#### Description:

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:

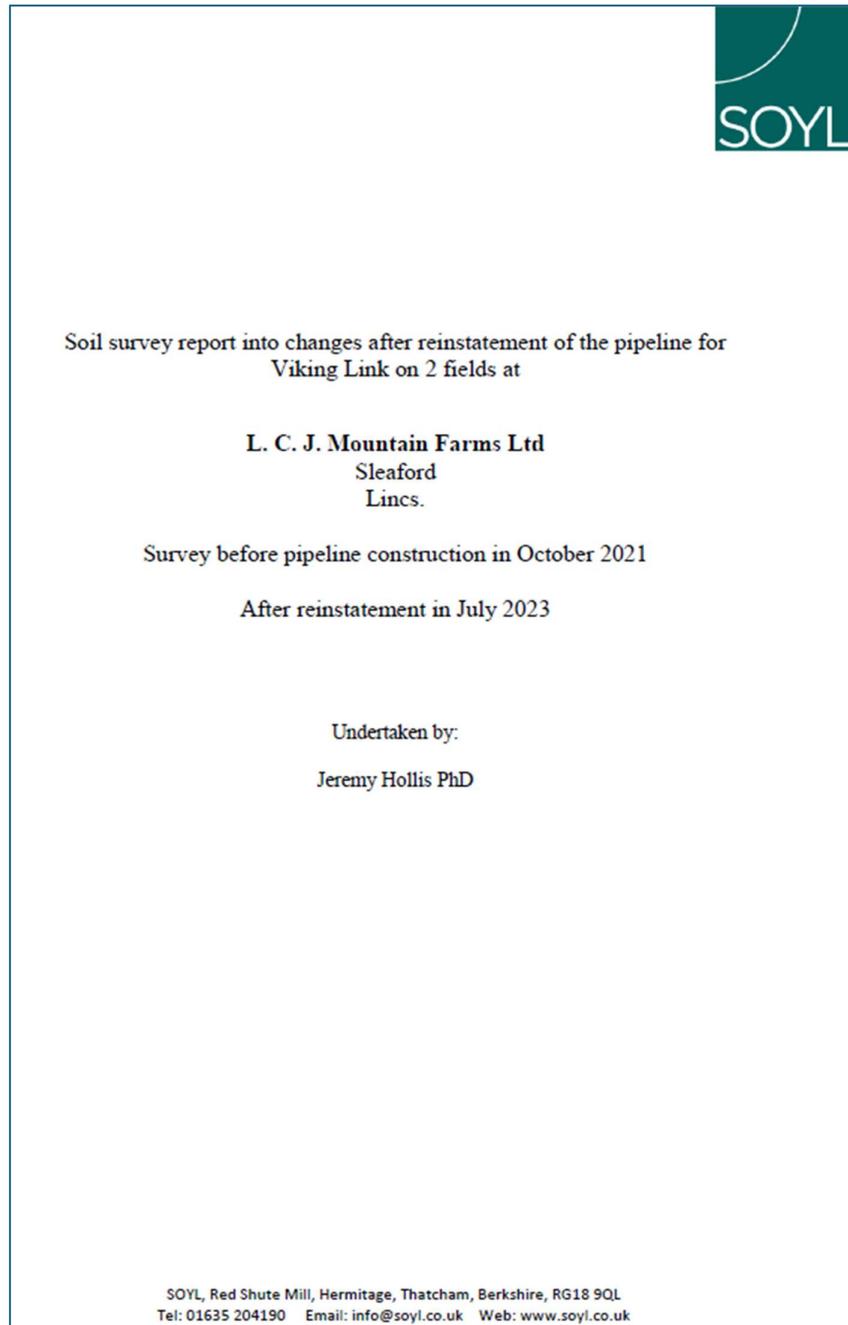
Commercial NDVI satellite dataset, 3 October 2023. LCJMF overlay © LCJ Mountain Farms Ltd 2025. Used for examination commentary.



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

ExD4.12

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



### **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

**ExD4.16**

**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**

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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.