

Beacon Fen Energy Park – Development Consent Order

Application Reference: EN010151

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

On behalf of: LCJ Mountain Farms Ltd and, if permitted, Leslie Christopher John Mountain and Patricia Lynn Mountain (Interested Party Ref: F5A76C031)

Document: Exhibits Volume (Ex7.1–Ex7.28)

Deadline: Deadline 7 (D7) – 09.02.2026

Author: Matthew Mountain, Director, LCJ Mountain Farms Ltd

Email: [REDACTED]

Purpose

This Exhibits Volume accompanies **LCJM’s Written Representation submitted at Deadline 7 (D7)**. It compiles, in a single paginated document, all supporting evidence (ExD7.1–ExD7.28) referenced throughout the D7 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).

Structure

- **Pages 2–4** – Exhibits Index (table of contents for ExD7.1–ExD7.28).
 - **Pages 5 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).
-

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 D7 Written Representation**. The exhibits should be read alongside the relevant sections and exhibit references in that document.

| Exhibit | Title / Description | Page |
|----------------------|--|---------|
| ExD7.1 [ExD4.6] | Email from James Turley (Low Carbon) to LCJM dated 27 November 2021 declining LCJM’s 516-acre solar + BESS opportunity on the basis of “proximity to numerous other solar schemes (and therefore project risk through cumulative impact)” | 5 |
| ExD7.2 [ExD4.8] | Agricultural Land Classification (ALC) survey for AGR3 (Soil Environment Services, 03.11.2021) showing approximately 200 acres as 96% Grade 3a, with mapping and tabulated results | 6 |
| ExD 7.3 [ExD4.9a] | Plan overlaying national ALC mapping with AGR3’s Agricultural Land Classification of 96% Grade 3a – dated 03.11.21 | 7 |
| ExD 7.4 [ExD4.9b] | Plan overlaying national ALC mapping with the LCJM Hybrid cable route (yellow dashed line) showing the Hybrid tracking outside the darkest Grade 1 band compared with the Applicant’s chosen Option 1 | 8 |
| ExD7.5 [ExD4.1] | LCJM Internal log of time spent on the Low Carbon Beacon Fen project from 08.05.2023 to 07.02.25. Yellow rows show 420 minutes of failed attempts at meetings when the Option 1 cable route was announced. | 9 – 14 |
| ExD7.6 [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) | 15 – 16 |
| ExD7.7 [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. | 17 |
| ExD7.8 [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. | 18 |
| ExD7.9 [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 | 19 – 20 |
| ExD7.10 [ExD4.11] | 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. | 21 |

| | | |
|-----------------------|---|---------|
| ExD7.11 [ExD4.13] | 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. | 22 – 26 |
| ExD7.12 | LCJM and IB VOGT signed Heads of Terms (30 September 2024) (redacted) – evidence of contemporaneous PV+BESS proposition and progressed negotiations | 27 |
| ExD7.13 | LCJM and IB VOGT Option showing 52 pages and 16,705 words – evidence of contemporaneous PV+BESS proposition and progressed negotiations | 28 |
| ExD7.14 | LCJM ad IB VOGT Lease showing 79 pages and 25,274 words – evidence of contemporaneous PV+BESS proposition and progressed negotiations | 29 |
| ExD7.15 | At ISH1, the Applicant’s witness (James Hartley Bond) confirmed that non-contiguous layouts introduce additional inter-array cable runs, may require additional substations, can draw in further third-party land interests, and can affect scheme viability at a project level.” | 30 |
| ExD7.16 | Applicant public consultation figure: Local Wildlife Sites mapping (illustrating symbology/emphasis and auditability concern) | 31 |
| ExD7.17 [ExD6.23] | The Applicant has chosen an internal alignment (“Access Option 1”) that <u>maximises</u> “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. | 32 |
| ExD7.18 [ExD6.24] | Map showing - beyond “Indicative LCJM Amended Alternative Access Option 2 ” – the purple line on Little Hale Drove - why would the applicant not use the black dashed line [red arrows] to avoid <u>all</u> longitudinal interaction with the Great Hale Eau LWS? | 33 |
| ExD7.19 [ExD6.9] | 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 | 34 |
| ExD7.20 [ExD6.10a] | On the ground photographs of Farm Buildings Number 1 [Ex D6.9] showing them not to be a residential property [taken by Matthew Mountain 8 th January 2026] | 35 |
| ExD7.21 [ExD6.10b] | On the ground photographs of Farm Buildings Number 1 [Ex D6.9] showing them not to be a residential property [taken by Matthew Mountain 8 th January 2026] | 36 |
| ExD7.22 [ExD6.10c] | Desktop obtained google Image of Site 1 [Ex D6.9] - showing clearly not a residential dwelling though claimed to be so by Low Carbon | 37 |
| ExD7.23 [ExD6.11a] | On the ground photographs of Farm Buildings Number 2 [see Ex D6.9] showing them not to be a residential property [taken by Matthew Mountain 9 th January 2026] | 38 |

| | | |
|-----------------------|--|----|
| ExD7.24 [ExD6.11b] | 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 | 39 |
| ExD7.25 [ExD6.12a] | On the ground photographs of Farm Buildings Number 3 [see Ex D6.9] showing them not to be a residential property [taken by Matthew Mountain 9 th January 2026] | 40 |
| ExD7.26 [ExD6.12b] | On the ground photographs of Farm Buildings Number 3 [see Ex D6.9] showing them not to be a residential property [taken by Matthew Mountain 9 th January 2026] | 41 |
| ExD7.27 [ExD6.12c] | On the ground photographs of Farm Buildings Number 3 [see Ex D6.9] showing them not to be a residential property [taken by Matthew Mountain 9 th January 2026] | 42 |
| ExD7.28 [ExD6.12d] | 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 | 43 |
| | | |

ExD7.1 [ExD4.6]

Document: Applicant's response email to LCJM's November 2021 land offer (516 acres / 209 ha), located c 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.

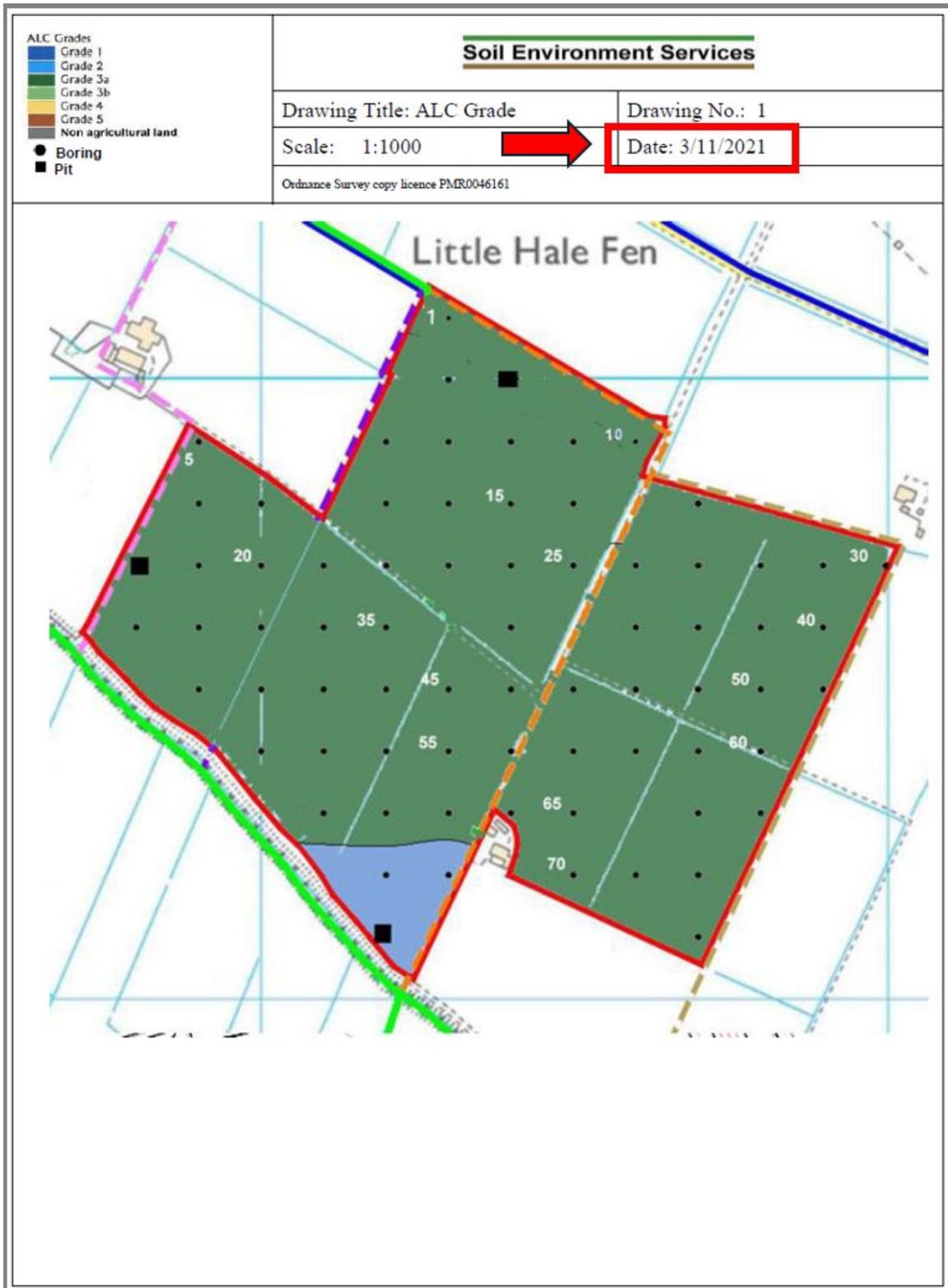
Source: Email from James Turley (Low Carbon) to LCJM, 27 November 2021. © LCJ Mountain Farms Ltd 2025.



ExD 7.2 [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 LCJM and can be submitted to the Examining Authority upon request.

ExD7.3 [ExD4.9a]

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 LCJM to show AGR3 site boundary and field-surveyed Grade 3a classification. Contains OS data © Crown copyright and database right 2023.

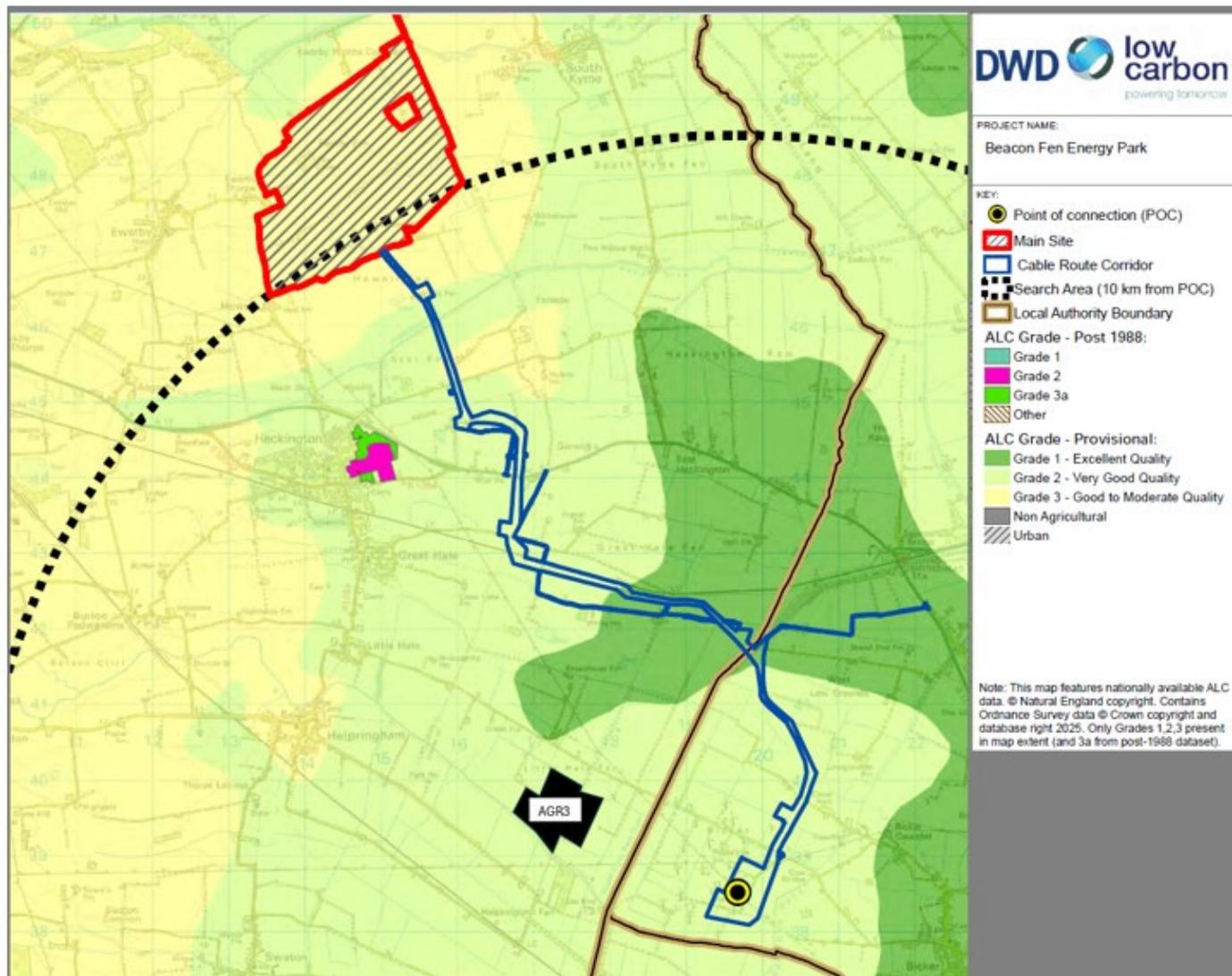


Figure: Extract from Applicant’s Planning Statement (APP-277), Appendix 2 – Site Selection Report, Annex D: Assessment Mapping Results (ALC Grades), prepared by DWD for Low Carbon (Beacon Fen Energy Park), with LCJM AGR3 overlay.

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.

ExD7.4 [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 LCJM to show AGR3 site boundary and field-surveyed Grade 3a classification. Contains OS data © Crown copyright and database right 2023.

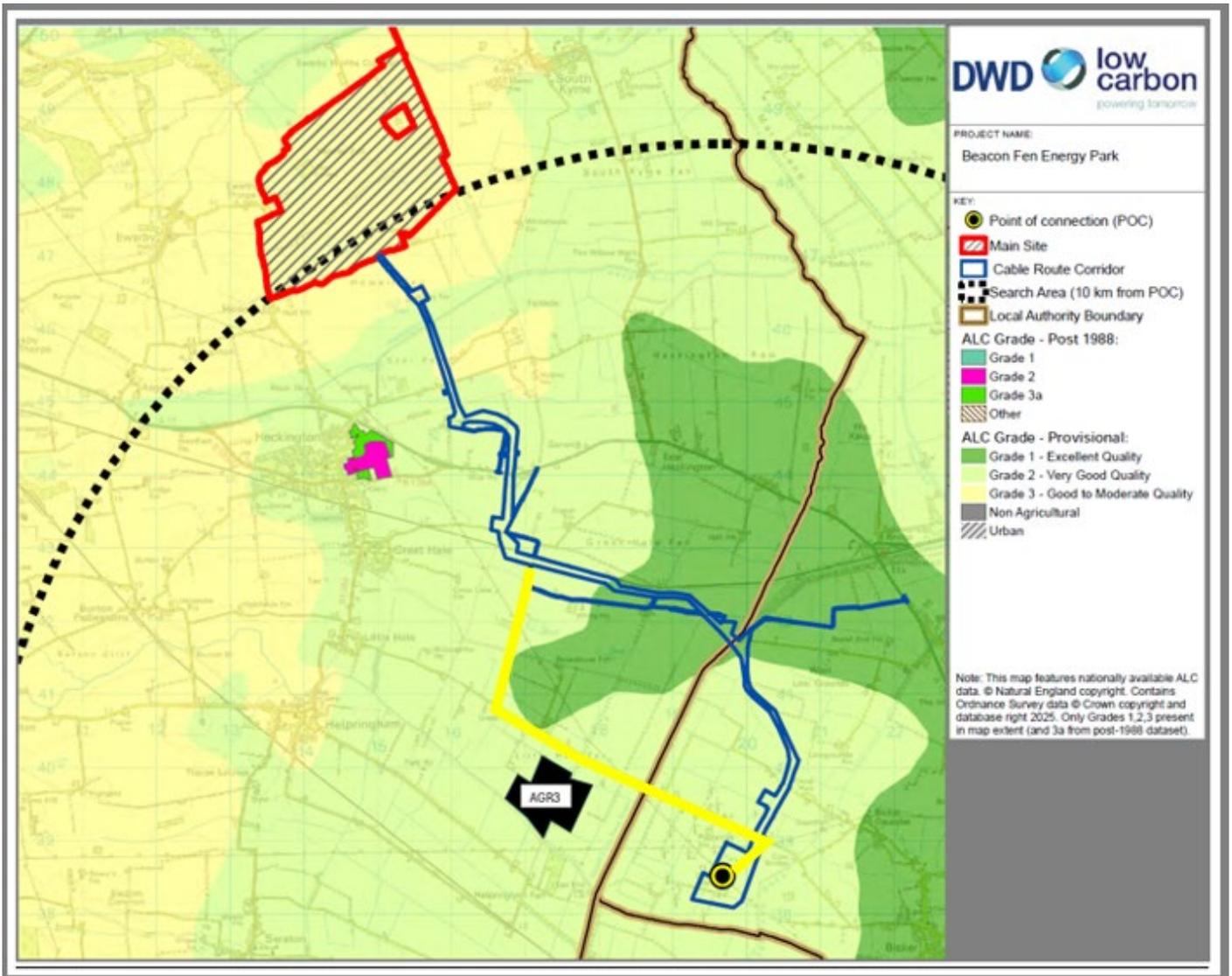


Figure: Extract from Applicant’s Planning Statement (APP-277), Appendix 2 – Site Selection Report, Annex D: Assessment Mapping Results (ALC Grades), prepared by DWD for Low Carbon (Beacon Fen Energy Park), with LCJM AGR3 overlay.

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.

ExD7.5 [ExD4.1] - LCJM Internal log of time spent on the Low Carbon Beacon Fen project from 08.05.23 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 | | Description | Org | Personnel | Type | Duration - minutes | | | | Time Accrued - minutes | Response |
|--------------------|----------------|--------|---|--------------|--------------|--------|--------------------|---------------|----------------|-------------------------|------------------------|----------|
| | Time | Finish | | | | | 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 - 07458 079390 - 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 |
| 18.08.23 | | | Email to James Turley, Sean Collins-Jones, Jessica Gough, James Hartley-Bond asking for a response - no response | Low Carbon | James | | | | | | | |
| 19.08.23 | 02.10 | | | 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 | James 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 m3 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 | |

| | | | | | | | | | | | |
|----------|-------|---|-----------|--------------------|------------------|----|----|----|--|--|----|
| 21.12.23 | | Letter to Ardent from Mishcoons - 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; 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. | Ardent | Sean Collins Jones | Letter via email | 24 | 24 | 24 | | | 72 |
| 06.01.24 | 13.07 | Email to Tom Barton about s172 notices and the very wet state of the land for surveys | Mishcoons | Tom Barton | Email | 18 | | | | | 18 |
| 14.01.24 | 07.44 | Email about undertaking for fees and Land referencing Forms | Mishcoons | Tom Barton | Email | 6 | | | | | 6 |
| 18.01.24 | | Email to Tom Barton about the initial letter they sent in to Low Carbon and whether we had had a response | Mishcoons | Tom Barton | Email | 12 | | | | | 12 |
| 23.01.24 | 06.54 | Email to Mishcoons to complain about this - "On behalf of Beacon Fen, we have previously contacted you in writing via letters dated 30/03/2023, 14/04/2023, 03/08/2023, and 08/12/2023 to gain access to the Land to carry out surveys in relation to the Project. As explained in our previous correspondence, these surveys are necessary to provide our engineers and designers with a better understanding of the land which will better inform the development of the Project's DCO application, and particularly the Environmental Impact Assessment. Unfortunately, we have not been able to agree voluntary access with you to the Land either due to lack of response or explicit refusal to engage with us about this matter. As outlined in the letter dated 8th December 2023, we now write to confirm our intention to take entry to the Land pursuant to section 172 of the Housing and Planning Act 2016 ("the 2016 Act") for the purpose of carrying out the surveys in connection with the Project." I have been trying to have a meeting with Low Carbon and Ardent for months - see above. | Mishcoons | Tom Barton | Email | 24 | | | | | 24 |
| 23.01.24 | | Discussion about the Housing and Planning Act 2016 (the "2016 Act") | Mishcoons | Tom Barton | Email | 6 | | | | | 6 |
| 23.01.24 | 21.02 | Email about the PEIR documents - A combination of desktop studies and site walkovers were undertaken in order to identify key environmental constraints in relation to the potential cable route search area, comprising land between BFN, BFS and Bicker Fen substation. | Mishcoons | Tom Barton | Email | 18 | | | | | 18 |
| 23.01.24 | 21.02 | submission of the Scoping Report further refinement took place. Environmental, land and planning constraints were mapped within the Cable Route Search Area and reviewed by the Applicant's project team, including the designers, in order to start identifying potential cable routes within the Search Area. This included consideration of which routes could avoid key environmental constraints including Local Wildlife Sites and archaeological records and other heritage receptors, alongside other matters such as consideration of railway crossings, access requirements and other planning proposals. Option 1 is the shortest route, therefore reducing the scale and geographical extent of potential environmental effects. This option avoids the archaeological receptors to the east, close to Option 2, whilst also reducing the number of residential receptors in close proximity to the route. | Mishcoons | Tom Barton | Email | 24 | | | | | 24 |

| | | | | | | | | | | | | | | | | | | |
|----------|-------|--|---|--------------------------|---------------------------|-------|----|----|----|----|---|--|--|--|--|--|--|----|
| 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 |

Page 1

| | | | | | | | | | | | | | |
|---------------|-------|---|-------------------|------------------|-------|-------------|------------|------------|-----------|--------------|--------------------------------|--|-----------------------------------|
| 26.06.24 | 10.00 | Email from Mishcons re Lamd Interest Questionnaire and information gathering | Mishcons | Chanez | Email | 18 | | | | | | | |
| 01.07.24 | 18.02 | Land Interest Questionnaire response by MM to Chanez Lowe | Mishcons | Chanez | Email | 60 | | | | | | | 60 |
| 17.07.24 | 07.19 | Email from CL about LIQ - more questions | Mishcons | Chanez | Email | 24 | | | | | | | 24 |
| 02.08.24 | 18.41 | Email to CL with further information and amends to LIQ | Mishcons | Chanez | Email | 24 | | | | | | | 24 |
| 06.08.24 | 13.20 | Email re LIQ | Mishcons | Chanez | Email | 6 | | | | | | | 6 |
| 14.08.24 | 15.40 | Email to Mishcons re LIQ and land ownerships, freeholds and leaseholds | Mishcons | Chanez | Email | 24 | | | | | | | 24 |
| 14.08.24 | 3.05 | Email from CL re LIQ | Mishcons | Chanez | Email | 18 | | | | | | | 18 |
| 15.08.24 | 20.04 | Email to CL re LIQ | Mishcons | Chanez | Email | 36 | | | | | | | 36 |
| 20.08.24 | 3.14 | Email from CL Ire LIQ | Mishcons | Chanez | Email | 12 | | | | | | | 12 |
| 20.08.24 | 14.22 | Email to CL re LIQ | Mishcons | Chanez | Email | 24 | | | | | | | 24 |
| 03.09.24 | 9.26 | Email to Tom Barton - about their fees and my time on the LIQ | Mishcons | Tom Barton | Email | 6 | | | | | | | 6 |
| 09.09.25 | 15.27 | Email to Tom Barton requesting update | Mishcons | Tom Barton | Email | 6 | | | | | | | 6 |
| 08.11.24 | 11.03 | Email to John Sedgewick - Lamb weston - about LIQ | Lamb Weston | John | Email | 30 | | | | | | | 30 |
| 08.11.24 | 12.46 | Email from Tom Barton to Alistair Paul - Herbert Smith Freehills about LIQ and Lamb Weston | Mishcons | Tom Barton | Email | 6 | | | | | | | 6 |
| 14.11.24 | 10.05 | Email to Alex Milne about Lamb Weston LIQ | Ardent | Alex Milne | Email | 18 | | | | | | | 18 |
| 19.11.24 | 10.27 | Email from Sean Collins Jones about Lamb Weston - After a brief period of delay following the conclusion of our statutory consultation earlier in the year, we are now progressing towards application in Q1 next year. | Ardent | Sean C Jones | Email | 18 | 18 | 18 | | | | | 54 |
| 04.12.24 | 12.03 | Email from Bake O'Sullivan re hydrology survey | Wardell Armstrong | Blake O Sullivan | Email | 12 | 12 | 12 | | | | | 36 |
| 04.12.24 | 12.10 | Secind email from Blake O Sullivan about survey and their intention to access your land pursuant to the provisions of Section 172 & 174 of 'The Housing & Planning Act 2016'. | Wardell Armstrong | Blake O Sullivan | Email | 12 | 12 | 12 | | | | | 36 |
| 03.01.25 | 1.05 | Email to Sean C Jones asking for explanatiosn about menaing of ALLs, and giving permission to speak to ib VOGT + AGR with me on the calls too | Ardent | Sean C Jones | Email | 36 | 36 | 36 | | | | | 108 |
| 13.01.25 | 19.08 | Email from Sean Collins Jones confirming receipt of my email 02.01.25 | Ardent | Sean C Jones | Email | 6 | 6 | 6 | | | | | 18 |
| 18.01.25 | 03.11 | Email from Sean Collins Jones with Voluntary Agreement Heads of terms | Ardent | sean C Jones | Email | 36 | 36 | 36 | | | | | 108 |
| 07.02.25 | 08.34 | Email from Ed Blundy discussing VA HOTS | Brown & Co | Ed Blundy | Email | 6 | | | | | | | 6 |
| | | | | | | | | | | | | | 0 |
| Totals | | | | | | 2180 | 685 | 601 | 60 | 3,916 | 420 | | |
| | | | | | | | | | | | 65 hours and 16 minutes | | mins - failed attempts at meeting |

ExD7.6 [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
70 Kingsway
London WC2B 6AH
DX 37954 Kingsway
T [REDACTED]

Our Ref: 100887.20

Your Ref: Low Carbon - Beacon Fen Energy Park

London | Cambridge | Oxford | Hong Kong | Singapore

[REDACTED]
Principal Surveyor
Ardent
Third Floor
The Hallmark Building
52-56 Leadenhall Street
London
EC3M 5JE

21 December 2023

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

Dear [REDACTED]

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

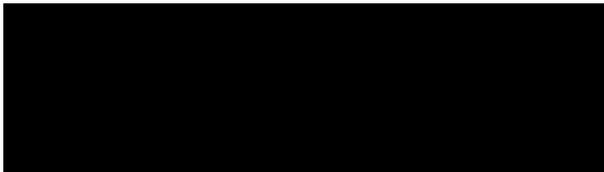
5. Why the cabling cannot follow the Little Hale Fen Road (per the AGR Solar project);
6. Whether the Project will incorporate BESS and if so where this is anticipated to be located; and
7. Use of our client's land for a previous potential BESS and solar project was not progressed in 2021 by Low Carbon 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:



Ex D7.7 [ExD4.5]

Email from [REDACTED] (Ardent) to [REDACTED] (Brown & Co), sent in response to [REDACTED] 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 LCJM — 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 LCJM’s reasonable and technically grounded alternatives during the statutory consultation process.

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

Dear [REDACTED]

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.beaconfenenergypark.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

 MRICS, RICS Expert Witness

ED7.8 [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 Incre | Cumulativ | MW Effective From | Project Status | Agreement Type | HOST TO | Plant Type |
| Bicker Fen 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 Fen 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 Incre | Cumulativ | MW Effective From | Project Status | Agreement Type | HOST TO | Plant Type |
|--------------------------------|---------------|--------|-------|---------|----------|-----------|-------------------|-------------------|--------------------|---------|--------------------------------|
| Bicker Fen 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 Fen 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

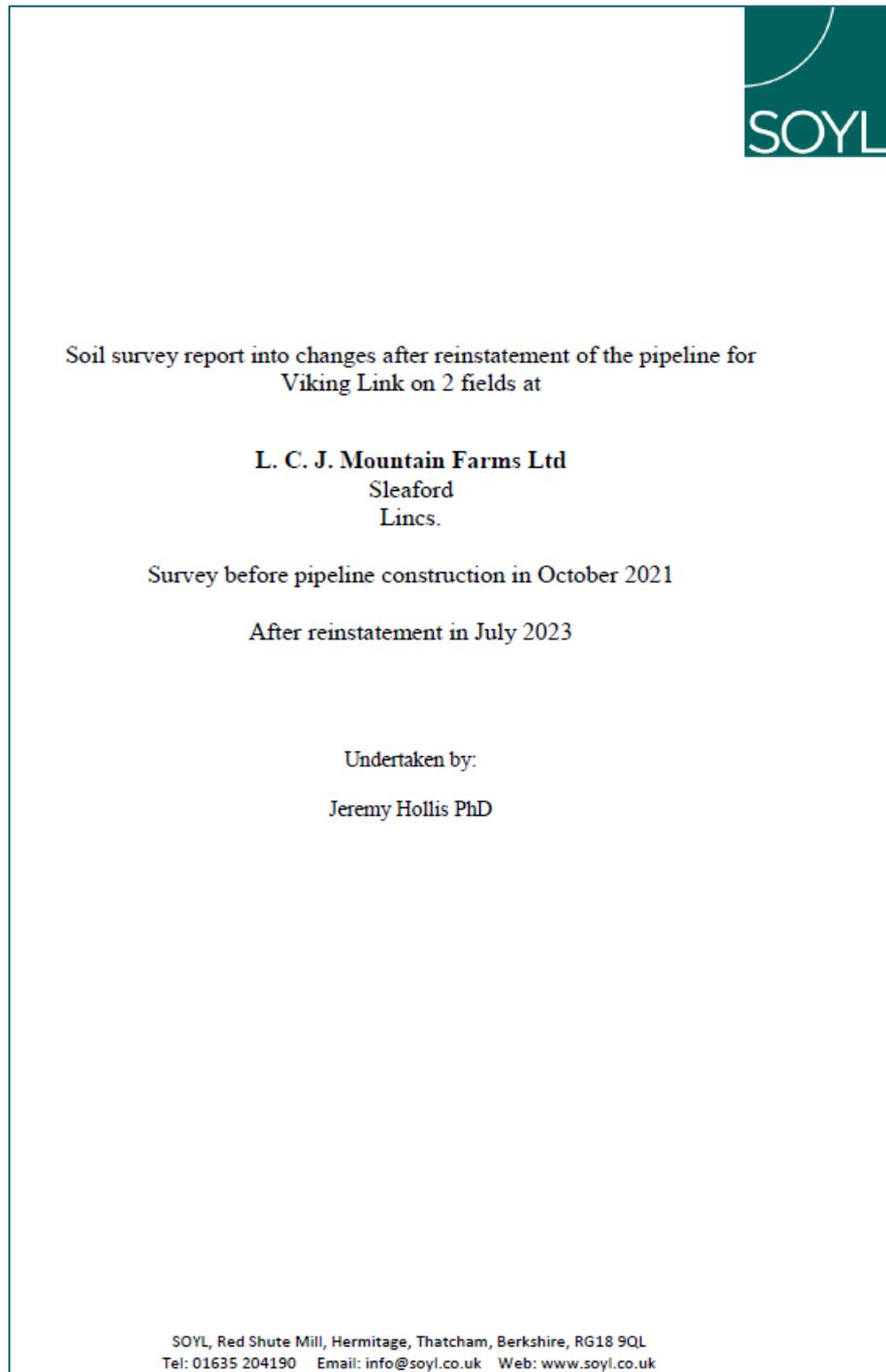
| Project | Customer Name | Connection Site | Stage | MW Co | MW Inc | Cumul | MW Effective From | Project Status | Agreement Type | HOST TO | Plant Type |
|---|-----------------------------|-----------------|-------|-------|--------|--------|-------------------|-------------------|--------------------|---------|---|
| Bicker Fen 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 Fen 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 Fen 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 Co | MW Inc | Cumul | MW Effective From | Project Status | Agreement | HOST T | 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 | 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 | 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 | 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 | 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 | 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 | 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 | Embedde | 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 | 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 | Embedde | NGET | Energy Storage System; PV Array (Photo Voltaic/solar) |
| Tyfer Hill Bicker Fen | FRV TH Powertek Limited | Bicker Fen 400kV Substation | | 0 | 400 | 400 | 30/05/2035 | Scoping | Direct Cor | NGET | Energy Storage System |

ExD7.9 [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.

ExD7.10 [ExD4.11]

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

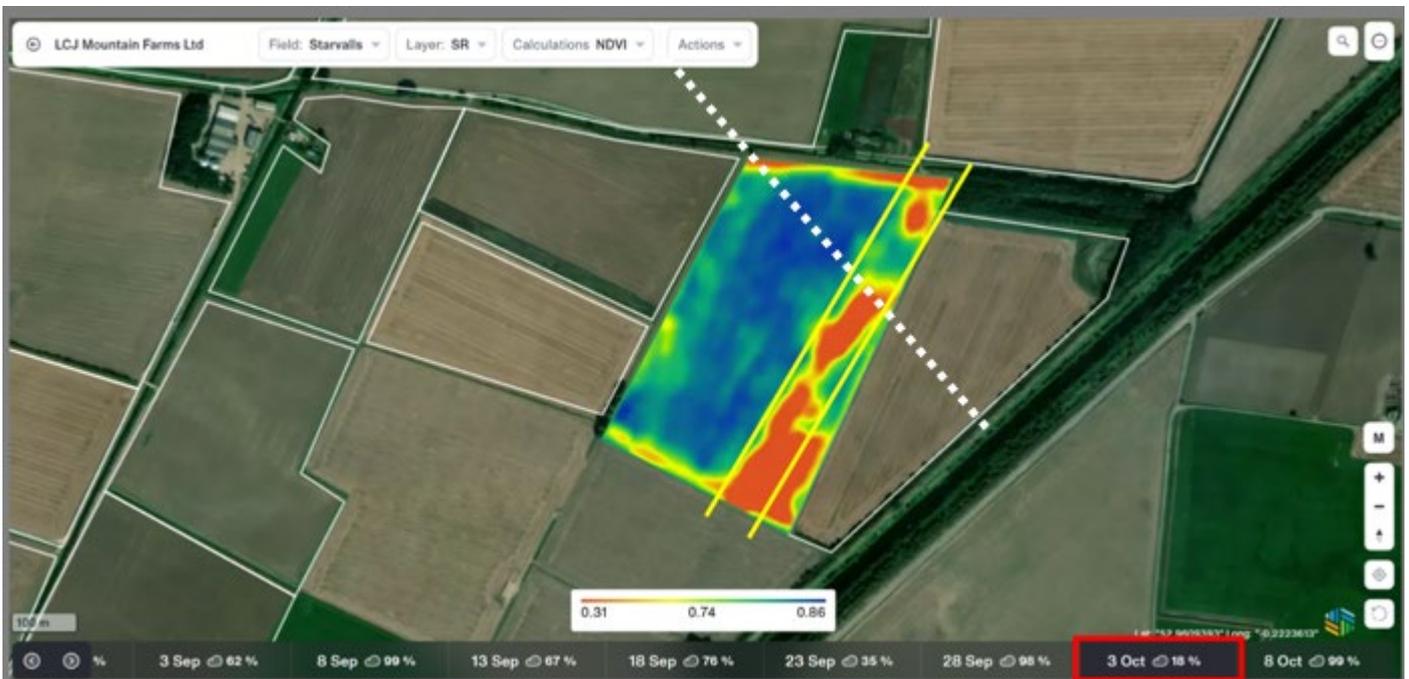
Description:

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. LCJM overlay © LCJ Mountain Farms Ltd 2025. Used for examination commentary.



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

ExD7.11 [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

SUBJECT TO CONTRACT

**OFFER AND GENERAL DRAFT HEADS OF TERMS
OPTION AND LEASE v15 (Agreed)**

Date: 30th September 2024

Great Hale Fen Energy Park

(Save as provided in part 4 the matters set out in these Heads of Terms remain subject to contract and are not intended to create any legally binding rights or obligations)

Date: 05/10/24

CONFIDENTIAL

These Heads of Terms consists of four parts, the parts being:

Part 1: Preliminaries applicable to both the option and lease; and

Part 2: Option Agreement to lease premises as described below, subject to contract; and

Part 3: Lease for these premises to operate when the option is exercised, subject to contract; and

Part 4: Legally Binding rights and obligations on the Landowner and the Tenant.

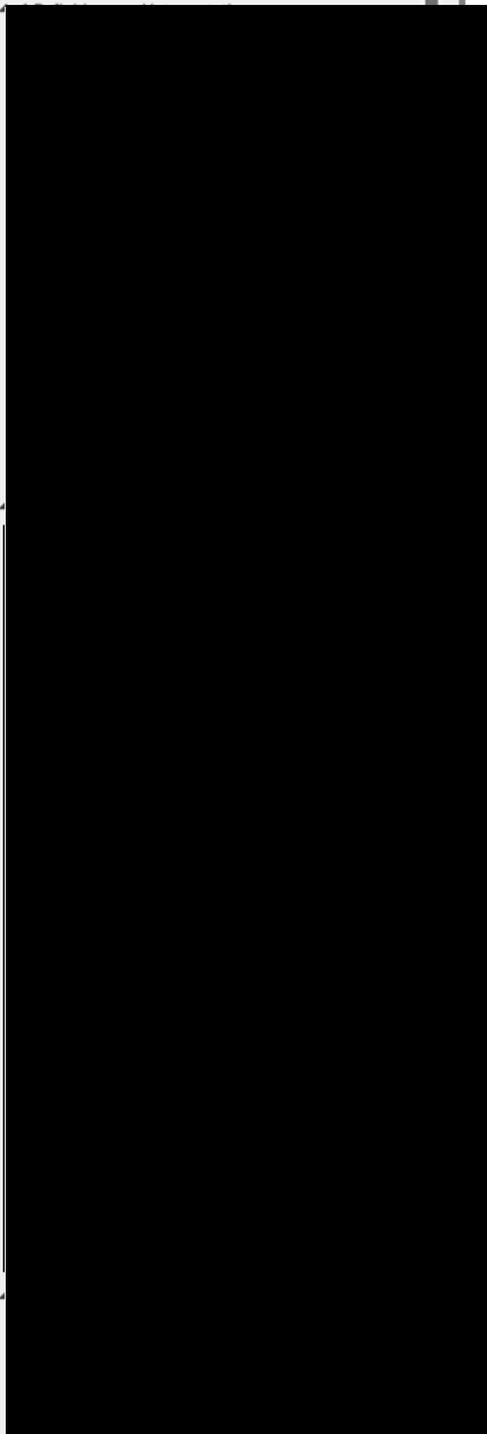
| PART 1: Preliminaries | | |
|-----------------------|-----------------------|---|
| 1.1 | Proposed Development | The construction, installation, operation, repair, replacement, renewal and decommissioning on the Option Site of a 400MW battery energy storage system facility comprising containers and battery cells together with a ground-mounted 49.9MW solar photovoltaic facility comprising photovoltaic cells, frames, cables, switchgear, roadways and ancillary equipment (including substation/ sealing end compound), environmental, landscaping rights reasonably necessary for the generation and export of renewable electricity, and/or the import and export of electrical energy via means of battery storage to and from the national grid. |
| 1.2 | Landowner | <p>LC MOUNTAIN FARMS LIMITED</p> <p>[REDACTED]</p> <p>Include definition clause for 'successors in title'</p> |
| 1.3 | Tenant | <p>Ib Vogt UK LTD SPV</p> <p>[REDACTED]</p> <p>127 Cheapside, London, EC2V 6BT</p> |
| 1.4 | Landowner's Solicitor | <p>Mishcon de Reya LLP, Cambridge</p> <p>[REDACTED]</p> |

ExD7.13 - LCJM and IB VOGT Option showing 52 pages and 16,705 words – evidence of contemporaneous PV+BESS proposition and progressed negotiations

Navigation

Search document

Headings Pages Results



DATED **2025**

(1) L C J MOUNTAIN FARMS LIMITED

and

(2) [IB VOGT UK SPV] LIMITED

OPTION AGREEMENT
FOR SOLAR AND BATTERY DEVELOPMENT
relating to land at Great Hale Fen, Sleaford, Lincs



BDB PITMANS

Registered Office
One Bartholomew Close
London
EC1A 7BL
DX 339401 London Wall

50/60 Station Road
Cambridge
CB1 2JH
DX 339601 Cambridge 24

The Anchorage
34 Bridge Street
Reading, RG1 2LU
DX 146420 Reading 21

Grosvenor House
Grosvenor Square
Southampton, SO15 2BE
DX 38516 Southampton 3

T +4 [REDACTED]

Page 1 of 52 16705 words English (United Kingdom)

ExD7.14 - LCJM ad IB VOGT Lease showing 79 pages and 25,274 words – evidence of contemporaneous PV+BESS proposition and progressed negotiations

Navigation

Search document

Headings Pages Results

1 Definitions and interpretation additional to Land

2 Grant of Lease

3 Tenant's covenants

DATED 202[]

(1) LC J MOUNTAIN FARMS LIMITED [LANDLORD]

and

(2) [IB VOGT SPV]

LEASE

in relation to [solar and]battery development relating to land at Great Hale Fen, Sleaford, Lincs

BDB
BDB PITMANS

Registered Office
One Bartholomew Close
London
EC1A 7BL
DX 339401 London Wall

50/60 Station Road
Cambridge
CB1 2JH
DX 339601 Cambridge 24

The Anchorage
34 Bridge Street
Reading, RG1 2LU
DX 146420 Reading 21

Grosvenor House
Grosvenor Square
Southampton, SO15 2BE
DX 38516 Southampton 3

T +44 [REDACTED]

Page 1 of 79 25224 words English (United Kingdom)

ExD7.15 - At ISH1, the Applicant's witness (James Hartley Bond) confirmed that non-contiguous layouts introduce additional inter-array cable runs, may require additional substations, can draw in further third-party land interests, and can affect scheme viability at a project level."

So I just introduced Mr. Hartley bond to discuss that more from the technical perspective, if that's appropriate. Thank you. Yes.

Speaker 6 37:59

James Hartley bond, for the applicant. From a technical point of view, having a non continuous site introduces further cable runs, what we refer to as inter array connections. So not only is that additional cabling, it can often or certain, in some instances, can incorporate further third parties to deliver those connections. The other aspect to that is that in order to link those parcels together, it can also include further electrical infrastructure. So you may also require additional substations, which introduces a further impact in delivering the scheme so

38:52

part of the

39:03

I do strict.

Speaker 1 39:13

Hello, can I just because from that people can still hear me,

Speaker 2 39:20

hello, so we so we can now, I don't know if it was just our feet, but we lost you for basically the extent of comments. And Mr. Hartley bonds comments. So if you

Speaker 1 39:32

apologies, this is the nature of relying on technology. I will, I will repeat my question. Mr. Hartley bond. So, following from your explanation, you mentioned non continuous sites, what? What are the restrictions that you are particularly worried about? So I, is it physical? Is it environmental constrictions? What? What does not make this a. Viable option for the applicant?

Speaker 6 40:04

Yeah, so I may defer to others on the sort of planning and environmental aspect, sir, if there's if there's a sort of follow up point, but purely in terms of the technical it introduces further costs in terms of the cable runs, but also the infrastructure so, so if you introduce more substations to gather in the electricity generated by each parcel that is non continuous, you're introducing a further feature which impacts the viability

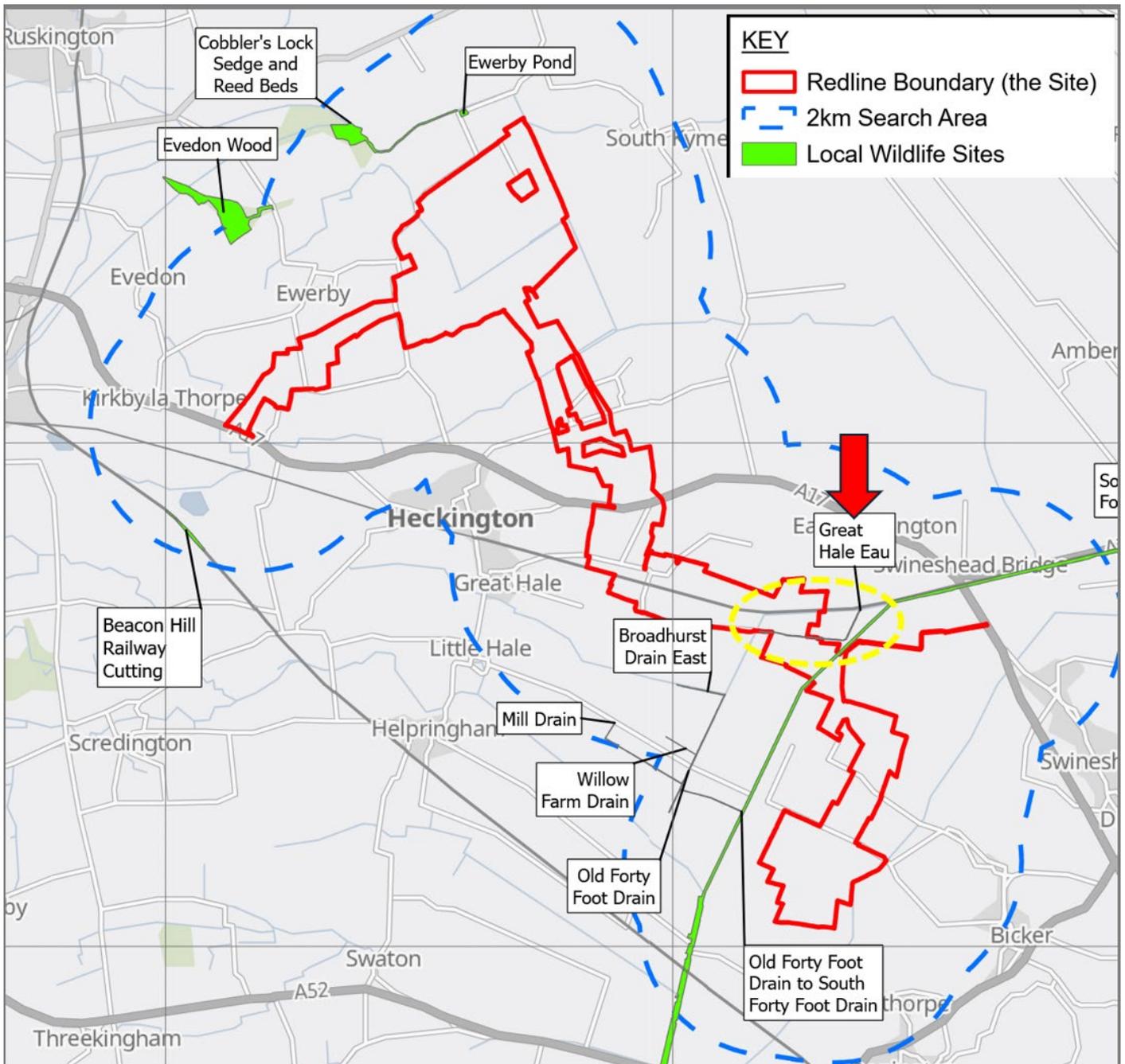
Speaker 1 40:34

I see. So you are meaning not the cable corridor itself, but actually the panel array area,

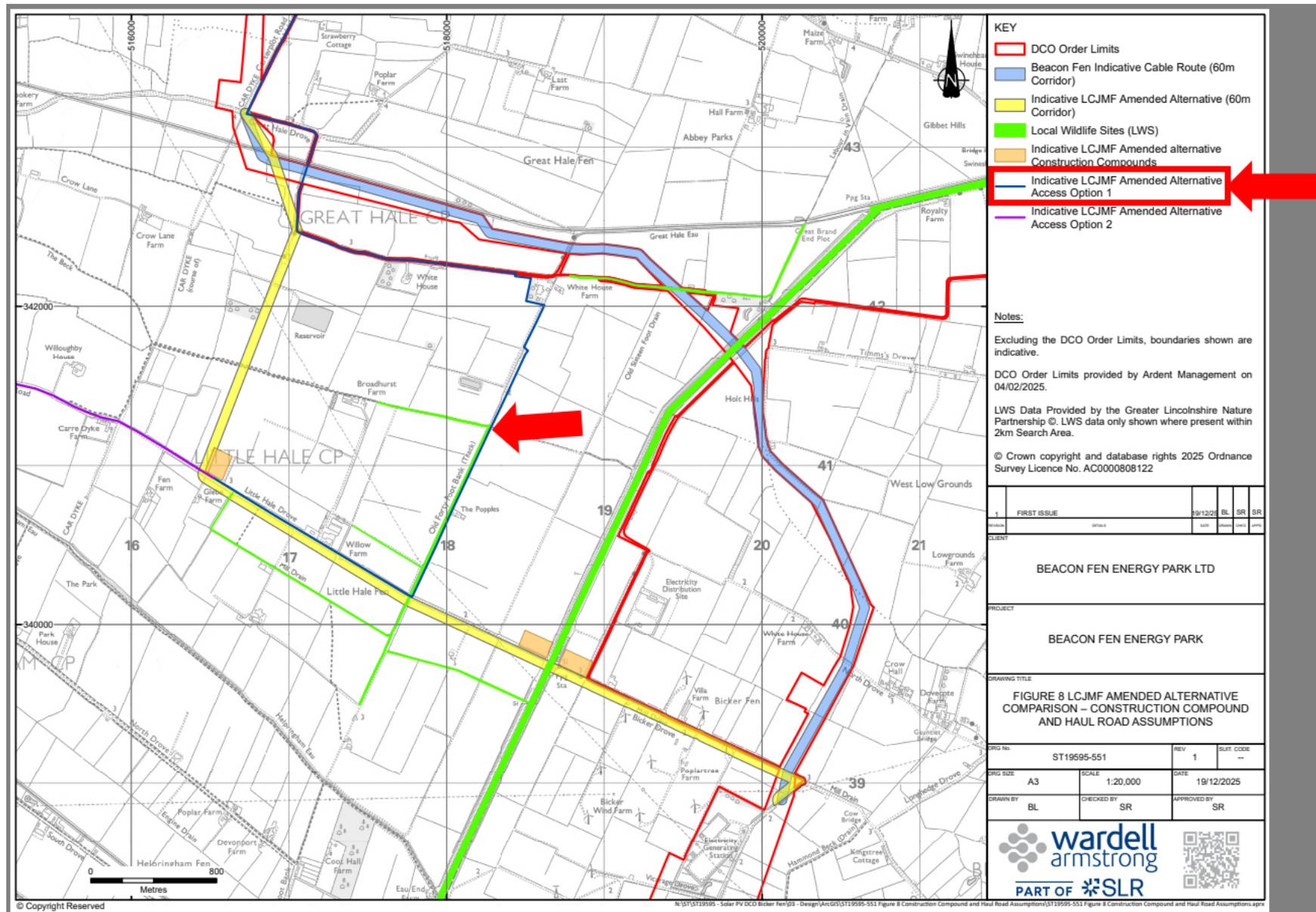
Speaker 6 40:41

that's correct, but I'm referring to it, sir, as at a project level, so within the overall project costs, right?

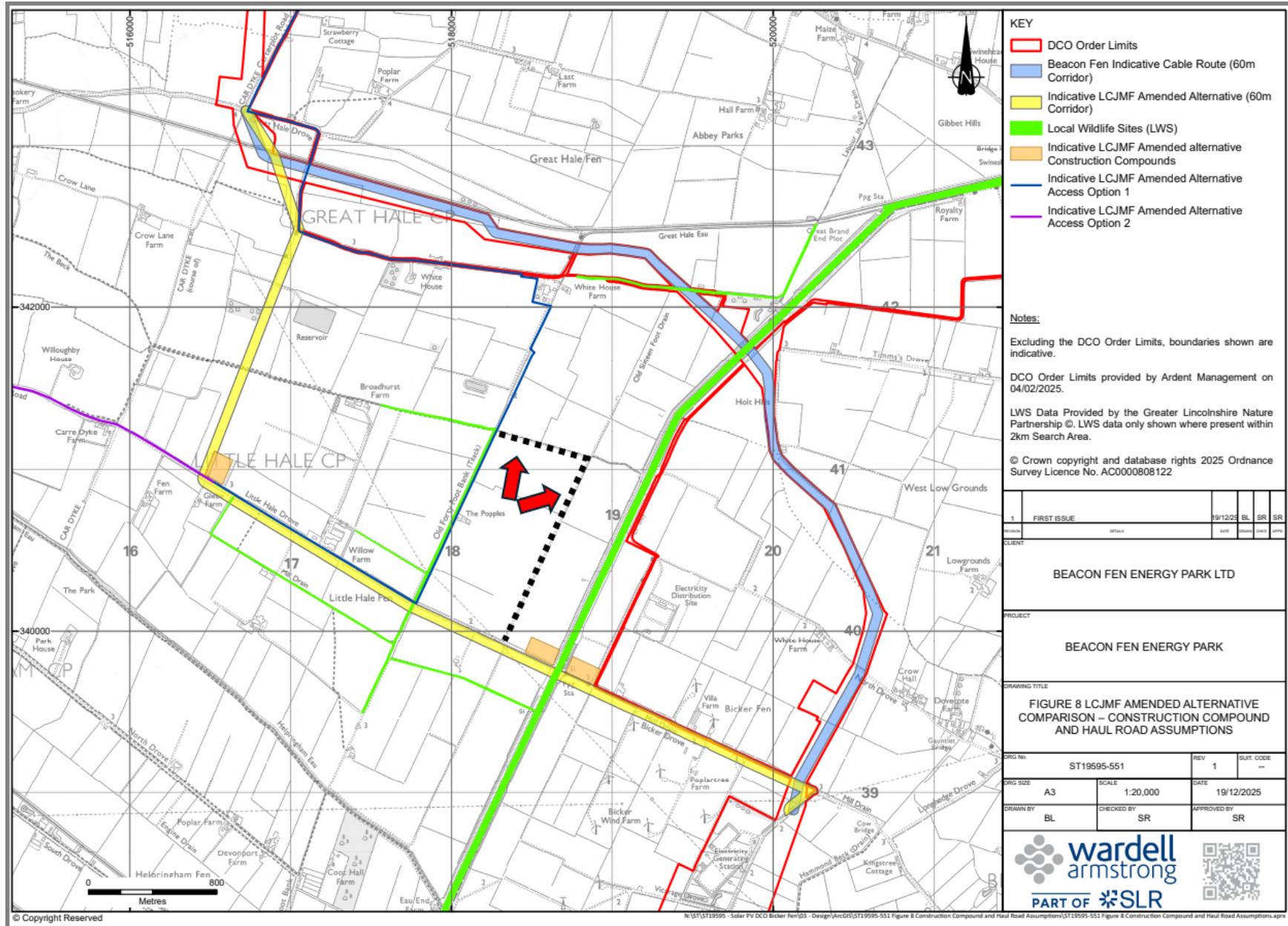
ExD7.16 - Applicant public consultation figure: Local Wildlife Sites mapping (illustrating symbology/emphasis and auditability concern)



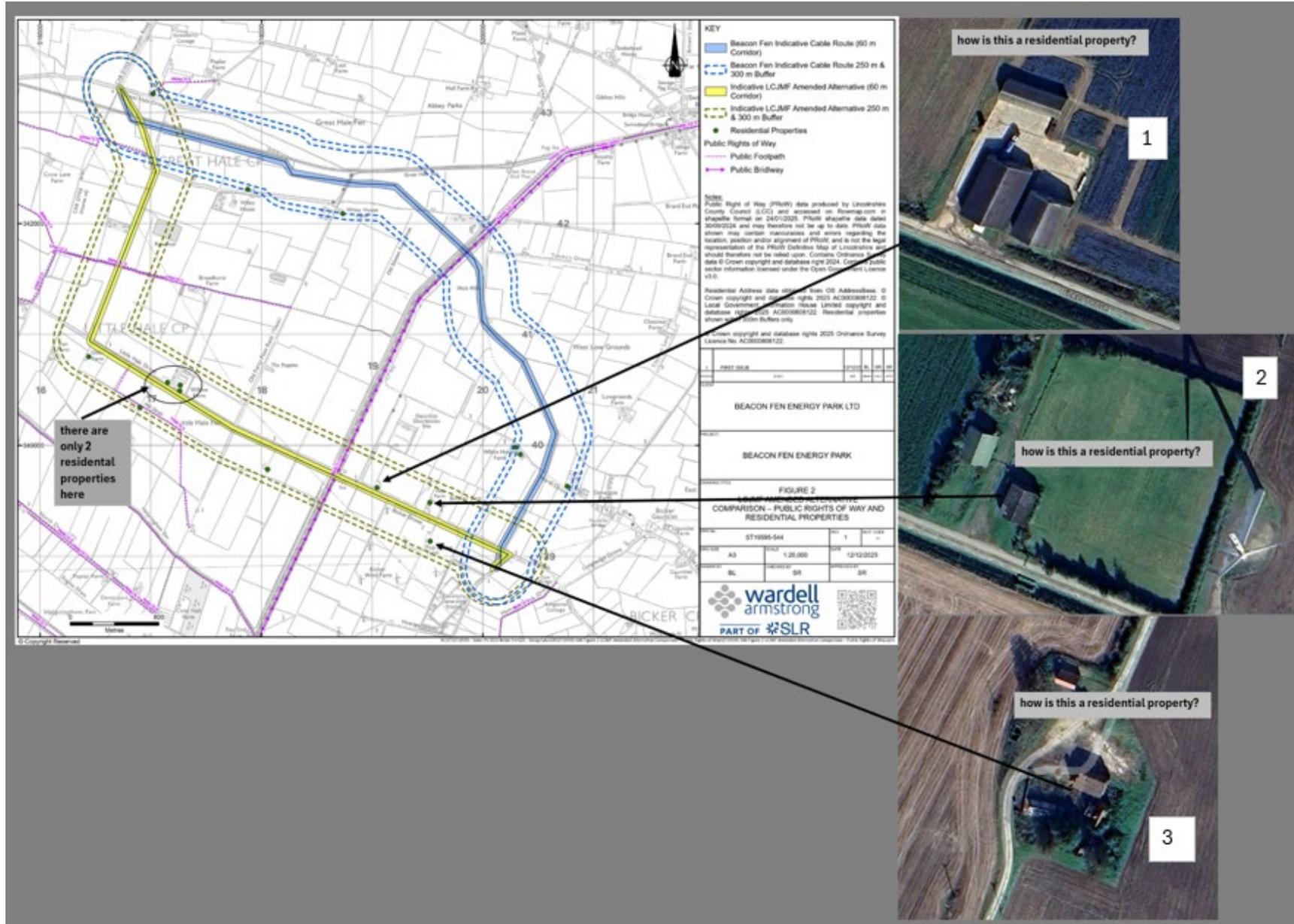
ExD7.17 (ExD6.23) - The Applicant has chosen an internal alignment (“Access Option 1”) that maximises “parallel within 50m of an LWS” lengths and then deploys those inflated figures to load ecological interaction onto the LCJM Hybrid. That is a selective and self-serving evidential assumption, and it further undermines the reliability and weight of Table 2 as a comparator.



ExD7.18 (ExD6.24) - 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?



ExD7.19 (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



ExD7.20 [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 Matthew Mountain 8th January 2026]



ExD7.21 [Ex D6.10**b**] On the ground photographs of **Farm Buildings Number 1** [Ex D6.9] showing them not to be a residential property [taken by Matthew Mountain 8th January 2026



ExD7.22 [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



ExD7.23 [Ex D6.11.a] – On the ground photographs of **Farm Buildings Number 2** [see Ex D6.9] showing them not to be a residential property [taken by Matthew Mountain 9th January 2026]



ExD7.24 [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



ExD7.25 [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 Matthew Mountain 9th January 2026]



ExD7.26 [Ex D6.12**b**] On the ground photographs of **Farm Buildings Number 3** [see Ex D6.9] showing them not to be a residential property [taken by Matthew Mountain 9th January 2026]



ExD7.27 [Ex D6.12.c] On the ground photographs of **Farm Buildings Number 3** [see Ex D6.9] showing them not to be a residential property [taken by Matthew Mountain 9th January 2026]



ExD7.28 [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

