

Our Ref: TBBPRO216.2
Your Ref: EN010155

Direct Dial: [REDACTED]
[REDACTED]@keystonelaw.co.uk

National Infrastructure Planning
Temple Quay House
2 The Square Bristol
BS1 6PN

By Email Only

27 October 2025

Dear Sirs,

Our client: 12 Property FE Limited
Dean Moor Solar Farm DCO

Interested Party Reference number: FB2B328DF

We write further the Examining Authority's second written questions (ExQ2) and specifically question 2.5.1:

The ExA requests that this affected person, in relation to the purported freehold land interest, clarify the following:

- *The extent and specifics of the land interest and rights held.*
- *How the proposed development, having regard to the specifics of the works proposed within those plots, would interfere with the interests held.*

In response to the first element of the question, 12 Property FE Limited is the owner of the freehold mines and minerals and mineral substances other than coal and mines of coal present at works plots 1-26, 1-33, 1-35, and 1-38. This is accepted by the promotor as demonstrated by my client's interest being listed in the book of reference in respect of those relevant plots.

With regards to the second element of the ExA's question, my client is not in a position to provide any further detail than that already provided by the Applicant in response to written question 12.0. Further information has been sought from the Applicant although they claim not be in a position to confirm these details. This includes being unable to clarify the depths to which they will be required to excavate to. In discussions with the Applicant's solicitor the potential for a "no dig" approach was raised although no details provided.

In the absence of this clarity my client is maintaining its objection to the DCO on the basis of its unknown impact on their interest.

Yours faithfully

A handwritten signature in black ink that reads "Keystone Law". The script is cursive and fluid, with the words "Keystone" and "Law" written together.

Keystone Law