

Our Ref: TBBPRO216.2  
Your Ref: EN010155

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National Infrastructure Planning  
Temple Quay House  
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BS1 6PN

## By Email Only

23 November 2025

Dear Sirs,

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

**Interested Party Reference number:** [REDACTED]

As you will be aware our client's relevant interest is the freehold mines and minerals and mineral substances registered at the Land Registry with title number CU307418 in or under works plots 1-26, 1-33, 1-35, and 1-38. Our client's title was severed from the surface title and contains no express limitation on depth. In the absence of any such limitation, the courts will consider that the mineral estate begins immediately below the surface.

Firstly, it is our client's submission that the need for CPO powers in relation to their interest has not been justified given the applicant's disclosure of a potential "no dig" solution. The applicant's failure to carry out the necessary investigative survey works to establish the efficacy of this no dig solution isn't sufficient to establish the need for CPO powers.

Secondly, the applicant has repeatedly referred to shortcomings in our clients own "evidence" as to the mines & minerals present at the relevant areas. For clarity our client's freehold interest is expansive and we enclose the title plan to illustrate this. Our client does not hold granular information on the minerals present at each part of the interest, other than to say relevant deposits have been identified throughout it.

Due to a lack of firm information from the applicant as to the depths of the proposed scheme (having been referred to variously as up to 15m, up to 4m and 2m), the need for "exclusion zones" (on which no details have been provided) or the location of the "soil removal" referred to in the applicant's response to relevant representations (REP1-002), our client is clearly unable to provide the more detailed information being requested of them.

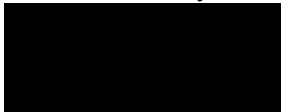
It should be noted that the applicant has carried out much more detailed ground surveys to the south of the site, but not the north where our client's interests are. The applicant's reasons for not having carried out adequate surveys throughout the application site have not been explained other than to refer to further "detailed design work".

It is our client's position that the application fails to demonstrate that all reasonable alternatives to compulsory acquisition, including modifications to the scheme or the use of a "no dig solution", have been explored. Likewise, the application falls well short of demonstrating the use of CPO powers is a "last resort" rather than being simply more convenient to the applicant. The investigative and preparatory work carried out by the applicant is insufficient to justify granting the application at this time.

My client maintains their objection to the Application on this basis.

At the compulsory purchase hearing on 13 November 2025 the Examining Authority requested the parties engage to try and reach a solution to this matter. By way of an updated despite this firm's attempts to engage with the applicant as directed to date they have declined to do so.

Yours faithfully

A solid black rectangular box used to redact the signature of the legal representative.

**Keystone Law**



HM Land Registry  
Official copy of  
title plan

This number C0051418  
Ordnance Survey map reference NY022946  
Scale 1:10000 reduced from 1:2500  
Administrative area Cambridgeshire, Aberrade



This official copy created on 14 November 2022 shows the state of the title plan on 14 November 2022 at 16:59:00.  
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This title is best used with the HM Land Registry, Ordnance Survey, and other official maps.