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**STATUTORY DECLARATION OF  
STEPHEN ROBERT WHATLING  
IN SUPPORT OF AN APPLICATION FOR A  
CERTIFICATE OF LAWFULNESS FOR A  
PROPOSED DEVELOPMENT OF  
LAND AT BURY GREEN FARM, BURY GREEN,  
LITTLE HADHAM, HERTS, SG11 2HE**

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## **TOWN AND COUNTRY PLANNING ACT 1990**

**STATUTORY DECLARATION in support of an application for a certificate of lawfulness under s192 of the Town and Country Planning Act 1990 in respect of land at Bury Green Farm, Bury Green, Little Hadham, Herts, SG11 2HE (the "Property")**

### **STATUTORY DECLARATION**

I, Stephen Robert Whatling, Chief Executive Officer (CEO) at Keysource Group Limited (Group), addressed at 3 City Place, Beehive Ring Road, London Gatwick Airport, Gatwick, England, RH6 0PA do solemnly and sincerely declare as follows:

1. I am the CEO of Keysource Group Limited with overall responsibility for Group strategy and performance, having started this role in January 2016. I remain so to date (7 years and 6 months).
2. Keysource Group is a global data centre specialist providing services to support the data centre lifecycle for end users and operators.
3. I summarise my key employment history by employer as follows: Chairman, Business Critical Solutions, July 2016 to October 2022 (6 years and 4 months); President and Director, SUPERNAP Thailand, November 2014 to January 2016 (1 year and 3 months); Executive Vice President Strategy and Business Development, SUPERNAP International, January 2014 to January 2016 (2 years and 1 month); Divisional Director then Executive Director, Hurley Palmer Flatt, September 2009 to December 2013 (4 years and 3 months); Director of Development and Construction, Digital Realty Trust, August 2006 to August 2009 (3 years and 1 month).
4. I was a Divisional Director then Executive Director of Hurley Palmer Flatt from September 2009 to December 2013 (4 years and 3 months). Between 2010 and 2011, I had responsibility for managing the sales and marketing functions for Hurley Palmer Flatt, as well as managing the data centre offering particularly in the area of front end consulting and management.
5. During this period, whilst a Divisional Director at Hurley Palmer Flatt, my firm was instructed by Matterhorn Capital DC Management Limited (Matterhorn) to oversee the works required to implement a planning permission at Bury Green Farm, Bury Green, Little Hadham (Property). I attach a copy of a plan showing the Property at Exhibit SW1.

6. My specific role for the Property was the Project Manager for the Property's development, specifically in relation to the implementation of the conditional detailed planning permission issued by East Herts Council on 10 July 2008 for Erection of 2 no. data centre buildings containing data handling computers, associated plant areas, technical support services and ancillary office area. 2 no external compounds, substation building and associated site works (East Herts Council planning reference: 3/08/0593/FP) (the "Permission"). I attach a copy of the Permission at Exhibit SW2.
7. Hurley Palmer Flatt's responsibilities included securing the discharge of all necessary planning conditions on the July 2008 permission and ensuring its implementation by 9 July 2011, being the deadline to carry out the approved development.
8. MJM Marine Limited (MJM) was appointed by Matterhorn in January 2011 to demolish most of the buildings which stood on the Property at that time save for those nearest the adjacent residential area (Demolition Works). Matterhorn paid a deposit of £120,000 (one hundred and twenty thousand pounds) being 50% of the cost of the Demolition Works to MJM on 10 February 2011 and a further £120,000 (one hundred and twenty thousand pounds) following completion of the Demolition Works on 25 March 2011. A further payment of £44,153.40 was paid by Matterhorn to MJM for agreed variations to the Demolition Works on 3 May 2011. I attach a copy of the receipted invoices for these payments at Exhibit SW3.
9. MACE was appointed to provide project management support services in respect of the Property from August 2010 to July 2011. MACE was also appointed by Matterhorn to manage the demolition works (including the provision of CDM Co-ordination services) in February 2011. It was also instructed by Matterhorn as the main contractor for works to construct the concrete base for the sub-station work (Construction Works). I attach a copy of the receipted invoices for payments made to MACE for these services at Exhibit SW4. They show that MACE received a total payment of £331,757 during this period including a payment of £304,527 for the Construction Works.
10. MACE sub-contracted the carrying out of the Construction Works to J Coffey. I attach a copy of the Operation and Maintenance Manual issued by J Coffey in respect of the Construction Works which includes the drawings of the Construction Works issued for tender in March 2011 at Exhibit SW5.
11. From my extensive personal, direct knowledge and experience managing the project, I can confirm that the actual work carried out by 9 July 2011 included: demolition, which involved clearing most of the buildings save for those nearest the adjacent residential area; and the construction of the substation slabs.
12. I can confirm the dates when the following works were carried out:
  - a. Between 1 and 28 February 2011: demolition and creation of breakout sub-base.

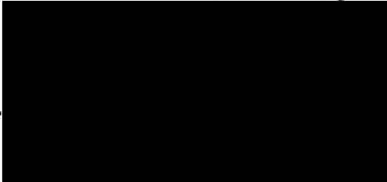
- b. Between 9 May and 3 June 2011: excavation, foundations & ducts for the substation slabs
- c. Between 30 May and 1 July 2011: construction of the concrete slabs

13. I attach the following additional evidence in support of this declaration:

- (a) Site Inspection Report, by Approved Inspector Services, 23 June 2011, at Exhibit SW6
- (b) Photographs of the substation concrete slabs dated 2 and 7 June 2011 at Exhibit SW7
- (c) Photograph of the substation slabs dated 1 July 2011 at Exhibit SW8

I consent to this declaration being used in support of the planning application.

AND I MAKE THIS SOLEMN DECLARATION conscientiously believing the same to be true and by virtue of the provisions of the Statutory Declarations Act 1835.

Signature of Declarant: .....  .....

Declared at: ..... LONDON .....

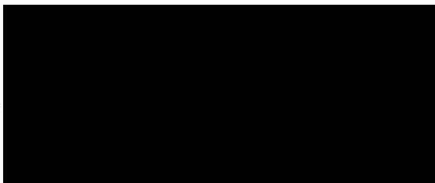
On [date]: ..... 29th September 2023 .....

BEFORE ME, a person entitled to administer Oaths

Name of Solicitor/Commissioner:

..... EDWARD JOHN COOKE .....

Qualifications: ..... SOLICITOR .....

Signature: .....  .....

**LAND AT BURY GREEN FARM, BURY GREEN, LITTLE HADHAM,**

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**Exhibit: "SW1"**

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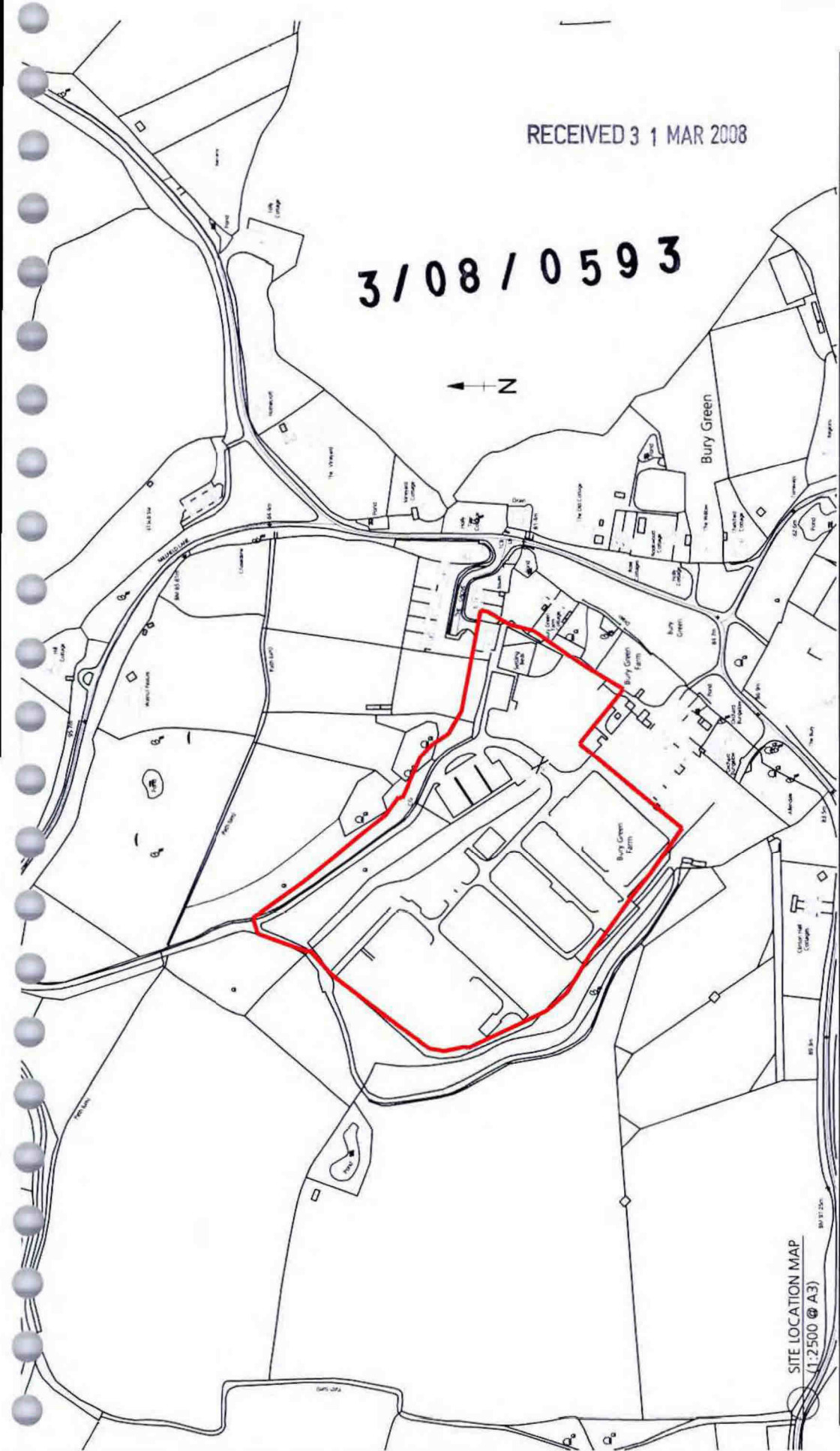
This is the Exhibit "SW1" referred to in the Statutory Declaration of Stephen Robert  
Whatling sworn this <sup>29th</sup>..... day of September 2023 before me



Solicitor/Commissioner for Oaths

RECEIVED 3 1 MAR 2008

3/08/0593



SITE LOCATION MAP  
(1:2500 @ A3)

REV	DATE	ISSUE	BY	DT	PROJECT NAME	PROPOSED DEVELOPMENT AT
#	28/03/08	ISSUED FOR FULL PLANNING	BB	CH	BURY GREEN FARM, MILLFIELD LANE, BURY GREEN	
PROJECT NO	L413700	SITE LOCATION MAP				
DESCRIPTION	DRAWING NAMEZ					
REV FILE	XREF_FILE					
PLOT FILE	SK007#					
SCALE	1:2500@A3					



ARCADIAM ASSOCIATES

REVISION #

SK.007

DRAWING NO

4 Duffryn Street  
 London EC1A 1BS  
 T 020 725 7620  
 F 020 725 7220  
 www.arcadium.com  
 ARCADIAM ASSOCIATES (UK)  
 COMPANY NO. 01314272  
 COMPANY NO. 01314272

**LAND AT BURY GREEN FARM, BURY GREEN, LITTLE HADHAM,**

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**Exhibit: "SW2"**

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This is the Exhibit "SW2" referred to in the Statutory Declaration of Stephen Robert Whatling sworn this <sup>29th</sup>..... day of September 2023 before me



Solicitor/Commissioner for Oaths



East Herts Council  
Wallfields, Pegs Lane  
Hertford, Herts  
SG13 8EQ  
Tel 01279 655261

**Town & Country Planning Act 1990**

**D E C I S I O N   N O T I C E**

Mr Robert Burke,  
Arcadium Associates  
14, Dufferin Street  
London  
EC1Y 8PD

**App no: 3/08/0593/FP**  
LITTLE HADHAM

**Erection of 2 no. data centre buildings containing data handling computers, associated plant areas, technical support services and ancillary office area. 2 no external compounds, substation building and associated site works.**

**Bury Green Farm, Bury Green, Little Hadham, Herts, SG11 2HE**

In pursuance of their powers under the above mentioned Act and the Orders and Regulations for the time being in force thereunder, the Council hereby

**GRANT PERMISSION SUBJECT TO CONDITIONS, as undermentioned -**

for the development proposed in your application dated 28 March 2008 and received with sufficient particulars on 16 April 2008 and shown on the plans \*as submitted/~~as amended~~, accompanying such application

- 1 The development to which this permission relates shall be begun within a period of three years commencing on the date of this notice.  
Reason  
To comply with the requirements of Section 91 of the Town and Country Planning Act 1990
- 2 Detailed plans, showing the existing and proposed ground levels of the site relative to adjoining land, together with the slab levels and ridge heights of the proposed buildings, shall be submitted to, and approved in writing by the Local Planning Authority prior to the commencement of development  
Reason  
To ensure that the development is properly related to the levels of adjoining development in the interests of amenity
- 3 Details of all boundary walls, fences, to include details of any security fencing or other means of enclosure shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any development. All such approved means of enclosure shall be erected prior to the first occupation of any dwellings commensurate therewith, and shall thereafter be retained to the satisfaction of the Local Planning Authority  
Reason





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- In the interests of privacy and visual amenity, in accordance with policy ENV1 of the East Herts Local Plan Second Review April 2007
- 4 Prior to any building works being commenced samples of the external materials of construction for the building hereby permitted shall be submitted to and approved in writing by the Local Planning Authority  
Reason  
• In the interests of the appearance of the development, and in accordance with policy ENV1 of the East Herts Local Plan Second Review April 2007
- 5 Details of any external lighting proposed in connection with the development shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of development, and no external lighting shall be provided without such written consent  
Reason  
*In the interests of the visual amenities of the area, and in accordance with policy ENV23 of the East Herts Local Plan Second Review April 2007*
- 6 No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority.  
Reason  
To secure the protection of and proper provision for any archaeological remains, in accordance with Government advice set out in PPG16 'Archaeology and Planning' and in accordance with policy BH2 of the East Herts Local Plan Second Review April 2007
- 7 Before the development hereby permitted is commenced, details shall be submitted to and approved in writing by the Local Planning Authority of the measures to be taken in the design, construction decommissioning and demolition of the development to, re-use existing materials within the new development , recycle waste materials for use on site and off, minimise the amount of waste generated, minimise the pollution potential of unavoidable waste; treat and dispose of the remaining waste in an environmentally acceptable manner; and to utilise secondary aggregates and construction and other materials with a recycled content The measures shall be implemented in accordance with the approved details  
Reason  
To accord with Hertfordshire Waste Local Plan policies 7 and 8
- 8 Prior to the commencement of development, a detailed survey and assessment of the site shall take place to determine if the land is contaminated and, if so, what remediation measures are necessary Any necessary remediation shall include measures to decontaminate the site (specifying actions and target levels relating to any contaminants found) and prevent pollution of groundwater and surface water All details of any survey, assessment and proposed remediation works (complete with a timescale) pursuant to this condition shall be submitted to and agreed in



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- writing by the Local Planning Authority and development shall only take place in accordance with the agreed details  
Reason  
To minimise and prevent pollution of the land and the water environment and in accordance with policy SD5 of the East Herts Local Plan Second Review April 2007
- 9 Wheel washing facilities shall be established within the site in accordance with details to be submitted to and approved in writing by the Local Planning Authority Such facilities, shall be established prior to the commencement of demolition or construction and shall be kept in operation at all times during demolition and construction works  
Reason  
To prevent the tracking out of materials onto the highway in the interests of highway safety
- 10 All existing trees shall be retained, unless shown on the approved drawings as being removed All trees on and immediately adjoining the site shall be protected from damage as a result of works on the site, to the satisfaction of the Local Planning Authority in accordance with relevant British Standards, for the duration of the works on site and until at least five years following contractual practical completion of the approved development In the event that trees become damaged or otherwise defective during such period, the Local Planning Authority shall be notified as soon as reasonably practicable and remedial action agreed and implemented In the event that any tree dies or is removed without the prior consent of the Local Planning Authority, it shall be replaced as soon as is reasonably practicable and, in any case, by not later than the end of the first available planting season, with trees of such size, species and in such number and positions as may be agreed with the Authority  
Reason  
To ensure the continuity of amenity afforded by existing trees, in accordance with policies ENV2 and ENV11 of the East Herts Local Plan Second Review April 2007
- 11 All existing hedges or hedgerows shall be retained, unless shown on the approved drawings as being removed All hedges and hedgerows on and immediately adjoining the site shall be protected from damage for the duration of works on the site to the satisfaction of the Local Planning Authority in accordance with relevant British Standards Any parts of hedges or hedgerows removed without the Local Planning Authority's consent or which die or become, in the opinion of the Local Planning Authority, seriously diseased or otherwise damaged within five years following contractual practical completion of the approved development shall be replaced as soon as is reasonably practicable, and, in any case, by not later than the end of the first available planting season, with plants of such size and species and in such positions as may be agreed with the Authority  
Reason  
To ensure the continuity of amenity afforded by existing hedges and hedgerows, in accordance with policies ENV2 and ENV11 of the East Herts Local Plan Second Review April 2007



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- 12 All existing trees, shrubs, natural and historic features not scheduled for removal, shall be fully safeguarded during the course of the site works and building operations No work shall commence on site until all trees, shrubs or features to be protected are fenced along a line to be agreed with the Local Planning Authority with 2.3 metre minimum height metal fencing (i.e. weld mesh) to BS5037 (2005) securely mounted into the ground Such fencing shall be maintained during the course of the works on site No unauthorised access or placement of goods, fuels or chemicals, soil or other materials shall take place inside the fenced area In the event that any tree dies or is removed without the prior consent of the Local Planning Authority, it shall be replaced as soon as is reasonably practicable and, in any case, by not later than the end of the first available planting season, with trees of such size, species and in such number and positions as may be agreed with the Authority

Reason

To ensure that trees, shrubs and other natural features to be retained are adequately protected from damage to health and stability throughout the construction period in the interests of amenity, in accordance with policy ENV2 and ENV11 of the East Herts Local Plan Second Review April 2007

- 13 No burning of materials shall take place where it could cause damage to any tree or tree group to be retained on the site or on land adjoining

Reason

To protect the health of trees to be retained in the interests of amenity, in accordance with policies ENV2 and ENV11 of the East Herts Local Plan Second Review April 2007

- 14 The soil levels within the root spread of trees/hedgerows to be retained shall not be raised or lowered

Reason

To avoid damage to health of existing trees and hedgerows, in accordance with policies ENV2 and ENV11 of the East Herts Local Plan Second Review April 2007.

- 15 No works or development shall take place until full details of both hard and soft landscape proposals have been submitted to and approved in writing by the Local Planning Authority These details shall include, as appropriate (a) Proposed finished levels or contours (b) Means of enclosure (c) Car parking layouts (d) Other vehicle and pedestrian access and circulation areas (e) Hard surfacing materials (f) Minor artefacts and structures (e.g. furniture, play equipment, refuse or other storage units, signs, lighting) (g) Proposed and existing functional services above and below ground (e.g. drainage, power, communications cables, pipelines, etc. indicating lines, manholes, supports, etc.) (h) Retained historic landscape features and proposals for restoration, where relevant (i) Planting plans (j) Written specifications (including cultivation and other operations associated with plant and grass establishment) (k) Schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate (l) Implementation timetables

Reason

To ensure the provision of amenity afforded by appropriate landscape design, in





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accordance with policy ENV2 of the East Herts Local Plan Second Review April 2007

- 16 All hard and soft landscape works shall be carried out in accordance with the approved details and to a reasonable standard in accordance with the relevant recommendations of appropriate British Standards or other recognised Codes of Good Practice. The works shall be carried out prior to the occupation of any part of the development or in accordance with the timetable agreed with the Local Planning Authority. Any trees or plants that, within a period of five years after planting, are removed, die or become, in the opinion of the Local Planning Authority, seriously damaged or defective, shall be replaced as soon as is reasonably practicable with others of species, size and number as originally approved, unless the Local Planning Authority gives its written consent to any variation.

Reason

To ensure the provision, establishment and maintenance of a reasonable standard of landscaping in accordance with the approved designs, in accordance with policy ENV2 of the East Herts Local Plan Second Review April 2007

17. Before any works commence on site, details of earthworks shall be submitted to and approved in writing by the Local Planning Authority. These details shall include the proposed grading and mounding of land areas including the levels and contours to be formed, showing the relationship of proposed mounding to existing vegetation and surrounding landform.

Reason

In the interest of maintaining the amenity value of the area, in accordance with policy ENV2 of the East Herts Local Plan Second Review April 2007

- 18 No plant or machinery shall be operated on the premises before 0730hrs on Monday to Saturday, nor after 1800hrs on weekdays and 1300hrs on Saturdays, nor at any time on Sundays or bank holidays.

Reason

To safeguard the amenities of residents of nearby properties, in accordance with policy ENV24 of the East Herts Local Plan Second Review April 2007.

- 19 Before the use commences a noise assessment should be carried out in accordance with BS4142 to establish whether the plant and machinery that are to be installed or operated in connection with the carrying out of this permission are likely to give rise to complaints at any adjoining or nearby noise sensitive premises. All plant, machinery and equipment installed or operated in connection with the carrying out of this permission shall be so enclosed and/or attenuated that noise from the plant and machinery does not, at any time, increase the ambient equivalent continuous noise level.

Reason

In order to protect the amenity of residential development in the nearby area in accordance with policy ENV24 of the East Herts Local Plan Second Review April 2007



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20 No site clearance works - building demolition, tree and shrub removal, and ground vegetation clearance – should be conducted during the period 1st March – 30th August.

Reason

- In order to protect breeding birds, their nests, eggs and young in accordance with policy ENV16 of the East Herts Local Plan Second Review April 2007

21. Prior to the commence of development there shall be submitted to, and agreed in writing by the LPA a construction methodology which shall include details of means of access to the site during construction, times during which construction shall take place, details of locations within the site where materials (either for construction, use in the final development, or disposal) shall be stored. Once agreed, construction shall take place in accordance with the agreed methodology unless any variation to it is agreed in writing by the LPA

Reason

In order to protect the amenity of residential development in the nearby area in accordance with policy ENV24 of the East Herts Local Plan Second Review April 2007

22 Prior to the commencement of development there shall be submitted to and agreed in writing by the LPA full details of any material to be removed from the site as a result of the recontouring of the site (cutting in of the development) proposed. Those details shall include the level to which the site is to be excavated, whether any material is to be brought onto the site as a result of the level change, what volume of material is to be removed (if any), where any surplus material is to be disposed of, the method of disposal; and the timescale over which any such works (including full disposal from or bringing onto the site of material) will be carried out. Once agreed, any such works shall only take place in accordance with the approved details unless any variation to them is agreed in writing by the local planning authority

Reason

In order to protect the amenity of residential development in the nearby area, in order to ensure that the visual impact of the development is kept to an acceptable minimum and to ensure that no inappropriate deposition of material takes place at the site in accordance with policies GBC4, EDE3 and ENV24 of the East Herts Local Plan Second Review April 2007

23 Once the site is in use for its intended purpose, all vehicular access to the site shall be from the existing access to the site from the north, linking to Millfield Lane, and from no other route

Reason



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- For the avoidance of doubt and in order to protect the amenity of residential development in the nearby area in accordance with policy ENV24 of the East Herts Local Plan Second Review April 2007

- 24 The development hereby permitted shall only be used for the purpose of a 'data centre' as described in the introduction to the Design and Access Statement submitted with application 3/08/0593/FP and for no other purpose.

Reason

- For the avoidance of doubt and in order that the local planning authority can consider the consequences of any alternative proposed use in accordance with the relevant planning policies currently in force and depending on the alternative use proposed

- 25 The proposed development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (Flood Risk and Run Off Assessment for proposed redevelopment Phase 2 Bury Green Farm, CD1000/010, June 2008) and the following mitigation measures detailed within the FRA

1 Limiting the surface water run-off generated by the 1 in 100 (plus climate change) critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site Greenfield run-off rate is to be achieved by retention in a pond or vegetated swale

Reason

To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site in accordance with Policy ENV21 of the East Herts Local Plan Second Review April 2007

#### **This decision relates to Plan Numbers**

AGD/A 0024B G , SK001, SK002 RevB, SK003 RevB, SK004 RevB, SK005, SK006, SK007, SK007 RevA, SK000 RevB

#### **Summary of Reasons for Decision**

The proposal has been considered with regard to the policies of the Development Plan (East of England Plan May 2008, Hertfordshire County Structure Plan, Minerals Local Plan, Waste Local Plan and East Herts Local Plan Second Review April 2007), and in particular policies GBC3, GBC4, EDE2, ENV1, ENV16, ENV19, ENV21, TR20 The balance of the considerations having regard to those policies is that permission should be granted

Please note that under new regulation 11D of the Town and Country Planning (fees for applications and deemed applications) (amendment) (England) Regulations 2008, a fee is chargeable of £85 per request (or £25 where the related permission was for extending or



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altering a dwelling house) for the discharge and/or confirmation of compliance with a condition To avoid any unnecessary cost we would recommend that you submit all the required information for discharge of conditions in one application as the fee is payable per request

Director of Neighbourhood Services  
(Development Control)  
Wallfields  
Pegs Lane  
Hertford SG13 8EQ

Dated 10 July 2008

Signed *S. Emery*  
Stephen Emery

SEE ATTACHED NOTES

**LAND AT BURY GREEN FARM, BURY GREEN, LITTLE HADHAM,**

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**Exhibit: "SW3"**

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This is the Exhibit "SW3" referred to in the Statutory Declaration of Stephen Robert Whatling sworn this <sup>29th</sup>..... day of September 2023 before me



Solicitor/Commissioner for Oaths



BUR

**MJM**  
**GROUP**  
MJM MARINE  
MJM SHOPFITTING



Carnbane Business Park  
Newry  
Co Down  
N. Ireland BT35 6QH

T: +44 (0) 28 302 58450  
F: +44 (0) 28 302 58489  
W: [www.mjm-group.com](http://www.mjm-group.com)  
E: [sales@mjm-group.com](mailto:sales@mjm-group.com)

**RECEIVED**  
10 FEB 2011

358285 BUR  
POSTED.



Matterhorn Capital Data Centres  
Management Limited  
C/O 10 Gloucester Place  
Portman Square  
London  
W1U 8EZ

Invoice No. [REDACTED]  
Invoice/Tax Date 31/01/11  
Order No. N/A

**BURY GREEN FARM STANSTEAD  
DEMOLITION WORKS**

50% deposit payment in relation to the  
above works.  
(Total contract sum £200,000)

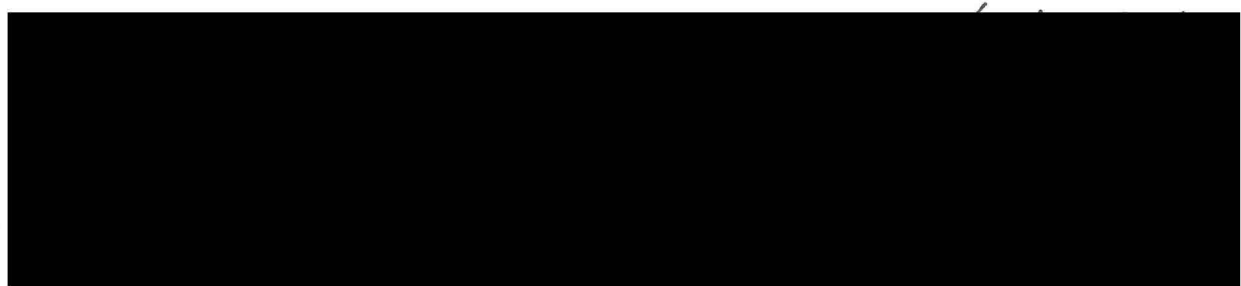
	Net	Vat
(Total contract sum £200,000)	£100,000	£20,000

PAID  
- 3 MAR 2011  
CHQ 100003.

<b>Total Net Amount</b>		<b>£100,000.00</b>
<b>Total Vat Amount</b>		<b>£ 20,000.00</b>
<b>Invoice Total</b>		<b>£120,000.00</b>

**Payment terms: On receipt of invoice**

Cheques should be made payable to MJM Marine Limited  
Bank details:  
Bank Name: Ulster Bank  
Bank Address: 12/14 Church Square, Rathfriland, Newry, Co Down  
Sort code: 98-13-60  
Account Name: MJM Marine Limited  
Account No. 58617056  
IBAN: GB10 ULSB 9813 6058 6170 56



858285 BUR

**MJM**  
**GROUP**  
MJM MARINE  
MJM SHOPFITTING



Carnbane Business Park  
Newry  
Co Down  
N. Ireland BT35 6QH

T: +44 (0) 28 302 58450  
F: +44 (0) 28 302 58489  
W: [www.mjm-group.com](http://www.mjm-group.com)  
E: [sales@mjm-group.com](mailto:sales@mjm-group.com)

GB Vat Reg. No. 412 5755 65

**Matterhorn Capital Data Centres  
Management Limited  
C/O 10 Gloucester Place  
Portman Square  
London  
W1U 8EZ**

**Invoice No. 4469**  
**Invoice/Tax Date 16/03/2011**  
**Order No. N/A**

**BURY GREEN FARM STANSTEAD  
DEMOLITION WORKS**

50% final payment in relation to the  
above works.  
(Total contract sum £200,000)

£100,000.00 £20,000.00

<b>Total Net Amount</b>			<b>£100,000.00</b> ✓
<b>Total Vat Amount</b>			<b>£ 20,000.00</b>
<b>Invoice Total</b>			<b>£120,000.00</b>

**Payment terms: On receipt of invoice**

Cheques should be made payable to MJM Marine Limited  
Bank details:  
Bank Name: Ulster Bank  
Bank Address: 12/14 Church Square, Rathfriland, Newry, Co Down  
Sort code: 98-13-60  
Account Name: MJM Marine Limited  
Account No. 58617056  
IBAN: GB10 ULSB 9813 6058 6170 56

PAID CHQ 100007  
25/03/11

Okay to pay. As  
per original  
Contract offer. Works complete  
24-3-11

**MJM**  
**GROUP**  
MJM MARINE  
MJM SHOPFITTING



RECEIVED  
- 5 APR 2011

Cambane Business Park  
Newry  
Co Down  
N. Ireland BT35 6QH

858285 BUR POSTED

T: +44 (0) 28 302 58450  
F: +44 (0) 28 302 58489  
W: [www.mjm-group.com](http://www.mjm-group.com)  
E: [sales@mjm-group.com](mailto:sales@mjm-group.com)

Matterhorn Capital Data Centres  
Management Limited  
C/O 10 Gloucester Place  
Portman Square  
London  
W1U 8EZ

GB Vat Reg. No. 412 5755 65

Invoice No. [REDACTED]  
Invoice/Tax Date 28/03/2011  
Order No. 182

**BURY GREEN FARM STANSTEAD  
DEMOLITION WORKS**

Agreed Variations for Phase 1 £36,794.50

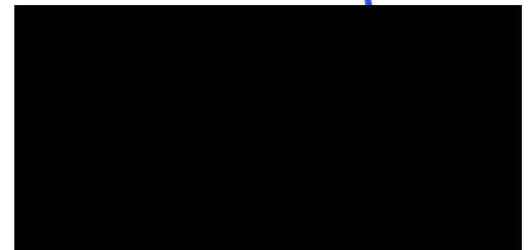
Total Net Amount £36,794.50

Total Vat Amount £ 7,358.90

Invoice Total £44,153.40

**Payment terms: On receipt of invoice**

Cheques should be made payable to MJM Marine Limited  
Bank details:  
Bank Name: Ulster Bank  
Bank Address: 12/14 Church Square, Rathfriland, Newry, Co Down  
Sort code: 98-13-60  
Account Name: MJM Marine Limited  
Account No. 58617056  
IBAN: GB10 ULSB 9813 6058 6170 56



PAYD  
- 5 MAY 2011  
CHQ 100016

1. okay to pay.  
[unclear] [unclear]



4-11

**LAND AT BURY GREEN FARM, BURY GREEN, LITTLE HADHAM,**

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**Exhibit: "SW4"**

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This is the Exhibit "SW4" referred to in the Statutory Declaration of Stephen Robert Whatling sworn this <sup>29th</sup>..... day of September 2023 before me



Solicitor/Commissioner for Oaths

BUR

# Invoice



Invoice No [REDACTED]

Matterhorn Capital Data Centre Management Limited  
10 Gloucester Place  
Portman Square  
London  
W1U 8EZ  
For the attention of Lloyd Simon

29 October 2010

858120 BUR  
POSTED &

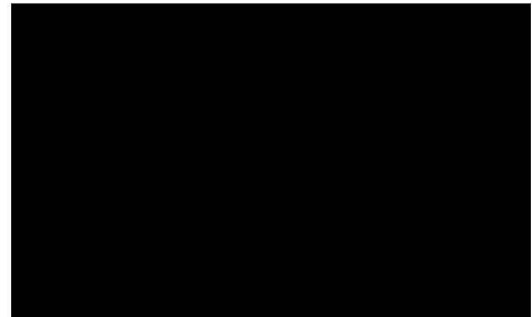
## Bury Green Data Centre

To provide project management support services as retained consultant for August, September and October 2010

Total

931	August Project Management Fees	4,500.00
931	September Project Management Fees	4,500.00
931	October Project Management Fees	4,500.00
Net		13,500.00
VAT 17.5%		2,362.50
<b>Total this invoice</b>		<b>15,862.50</b>

All figures are in UK Pounds



Credit 26785/1110076 applied

£11,750.00 remaining to pay

Payment is due by **28 November 2010**

Please make payment to  
Mace Limited  
Atelier House  
64 Pratt St  
London NW10LF  
Attention Alison Burgess  
tel +44 (0)20 7068 6171  
e-mail alison.burgess@macegroup.com

Or via BCS to Barclays Group plc  
London Corporate Banking  
PO Box 15161R  
50 Pall Mall  
London SW1A 1QA

Sort code 20-77-67  
Account Nr 80623881

Our VAT Registration Nr is 778 4687 56  
Mace Limited, part of the Mace Group  
Atelier House, 64 Pratt Street, London, NW1 0LF United Kingdom  
t+44 (0)20 7068 6000 f+44 (0)20 7554 8111 www.macegroup.com



BUR

# Credit note



Invoice No [REDACTED]

Matterhorn Capital Data Centre Management Limited  
10 Gloucester Place  
Portman Square  
London  
W1U 8EZ  
For the attention of Lloyd Simon

11 November 2010

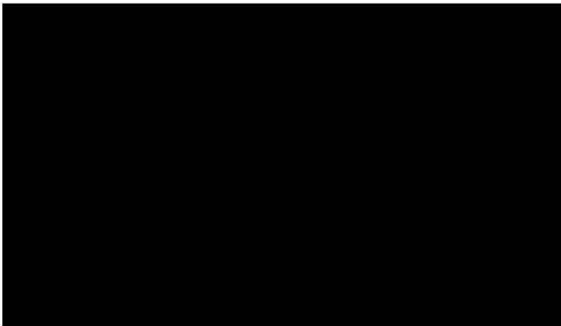
258100 BUR  
POSTED p.

## Bury Green Data Centre

*Credit issued as agreed between Richard Swain and Lloyd Simon.*

		Total
931	Credit on Fees for August - October 2010	-3,500.00
Net	[Credit]	-3,500.00
VAT	17.5%	-612.50
<b>Total this invoice</b>		<b>-4,112.50</b>

All figures are in UK Pounds



Payment is due by **11 December 2010**  
 Please make payment to Mace Limited  
 Atelier House  
 64 Pratt St  
 London NW10LF  
 Attention Alison Burgess  
 tel +44 (0)20 7068 6171  
 e-mail alison.burgess@macegroup.com

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 t+44 (0)20 7068 6000 f+44 (0)20 7554 8111 www.macegroup.com

BUR

# Invoice



Invoice No [REDACTED]

Matterhorn Capital DC Management Limited  
10 Gloucester Place  
Portman Square  
London  
W1U 8EZ  
For the attention of Lloyd Simon

31 January 2011

RECEIVED  
- 3 MAR 2011

85820 BUR POSTED

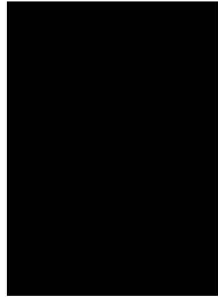
## Bury Green Data Centre

To provide project management support services as retained consultant for January 2011

Total

931	January Project Management Fees	5,000.00
Net		5,000.00
VAT 20.0%		1,000.00
<b>Total this invoice</b>		<b>6,000.00</b>

All figures are in UK Pounds



PAID CHQ 100000p  
23/03/11

Payment is due by **2 March 2011**

Please make payment to  
Mace Limited  
Atelier House  
64 Pratt St  
London  
Attention Alison Burgess  
tel +44 (0)20 7068 6171  
e-mail alison.burgess@macegroup.com  
Our VAT Registration Nr is 778 4687 56

Or via BCS to Barclays Group plc  
London Corporate Banking  
PO Box 15161R  
50 Pall Mall  
London SW1A 1QA  
Sort code 20-77-67  
Account Nr 80623881

RECEIVED  
- 5 MAR 2011

# Sales Invoice

Mace Sustain Limited, CDM Coordination

RS8120 BUR

<b>To:</b>	Matterhorn Capital DC Management Limited 10 Gloucester place Portman Square London W1U 8EZ	<b>Date:</b>	28th February 2011
<b>FAO:</b>	Lloyd Simon	<b>Invoice No:</b>	[REDACTED]
		<b>Client Ref:</b>	

<b>Description:</b>	
<b>Project:</b>	Bury Green Demolition
<b>Agreed Fee:</b>	£2,500.00
<b>Services:</b>	In accordance with the agreement for the provision of CDM Coordination services.
	[REDACTED]
	<div style="border: 1px solid blue; padding: 5px; display: inline-block;">             PAID - 5 APR 2011 CHQ 100012           </div>
<b>For Period Commencing:</b>	1st February 2011
<b>For Period Ending:</b>	28th February 2011
<b>Payment to be received by:</b>	31st March 2011

Mace Sustain Limited

VAT Registration No 778 4687 56

Please send Remittance Advice to: Maunik Raval

Bankers: Barclays Bank Plc  
UK Banking  
1 Churchill Place  
London  
E14 5HP  
20-77-67  
Account: 80184314

<b>Sub-Total</b>	£900.00
<b>VAT 20%</b>	£180.00
<b>Total</b>	<b>£1,080.00</b>



BUR

# Invoice



Invoice No [REDACTED]

Matterhorn Capital DC Management Limited  
10 Gloucester Place  
Portman Square  
London  
W1U 8EZ  
For the attention of Lloyd Simon

28 February 2011

RECEIVED  
- 5 MAR 2011

858120 BUR POSTED b.

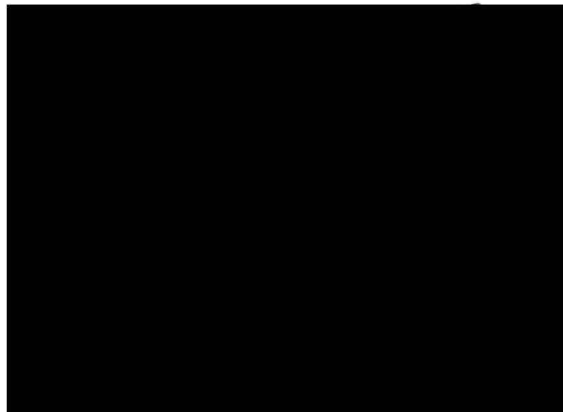
## Bury Green Data Centre

To provide project management support services as retained consultant for February 2011

Total

931	February Project Management Fees	5,000.00
	Net	5,000.00
	VAT 20.0%	1,000.00
	<b>Total this invoice</b>	<b>6,000.00</b>

All figures are in UK Pounds



Payment is due by **30 March 2011**

Please make payment to  
Mace Limited  
Atelier House  
64 Pratt St  
London  
Attention Alison Burgess  
tel: +44 (0)20 7068 6171  
e-mail alison.burgess@macegroup.com

Or via BCS to Barclays Group plc  
London Corporate Banking  
PO Box 15161R  
50 Pall Mall  
London SW1A 1QA  
Sort code 20-77-67  
Account Nr 80623881

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Atelier House, 64 Pratt Street, London, NW1 0LF United Kingdom  
t:+44 (0)20 7068 6000 f:+44 (0)20 7554 8111 www.macegroup.com

PAID  
- 5 APR 2011  
CHK 100011

BUR OR CEN

Invoice No



Invoice No [redacted]

Matterhorn Capital DC Management Limited  
10 Gloucester Place  
Portman Square  
London  
W1U 8EZ  
For the attention of Lloyd Simon

28 February 2011

RECEIVED  
- 5 MAR 2011

858.20  
~~858.20~~ BUR

**Bury Green Data Centre**

To provide Management of Demolition Contract - February 2011

	Total
931 Project Management Fees - Demolition	5,000.00
Net	5,000.00
VAT 20.0%	1,000.00
<b>Total this invoice</b>	<b>6,000.00</b>

All figures are in UK Pounds

020 068 6180



PAID  
- 5 APR 2011  
CHQ 100011

Payment is due by **30 March 2011**  
Please make payment to Mace Limited  
Atelier House  
64 Pratt St  
London  
Attention Alison Burgess  
tel +44 (0)20 7068 6171  
e-mail alison.burgess@macegroup.com

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London Corporate Banking  
PO Box 15161R  
50 Pall Mall  
London SW1A 1QA  
Sort code 20-77-67  
Account Nr 80623881

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