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The Planning Inspectorate  
Five Estuaries Offshore Wind Farm Case Team  
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**By Email: [FiveEstuaries@planninginspectorate.gov.uk](mailto:FiveEstuaries@planninginspectorate.gov.uk)**

Your ref  
Our ref CMH/KB/TABOR 000259.0092  
Date 21 October 2024

Dear Sirs,

**Application by Five Estuaries Offshore Wind Farm Limited for an Order Granting Development Consent for the proposed Five Estuaries Offshore Wind Farm (Five Estuaries Scheme).**

**SUMMARY OF THE**  
**WRITTEN REPRESENTATIONS ON BEHALF OF THE EXECUTORS OF THE ESTATE OF THE LATE MR CHARLES TABOR - INTERESTED PARTY NUMBER 5EST-AFP238 ('the Estate').**

The following is a summary of the Estate's objection dated 21 October 2024.

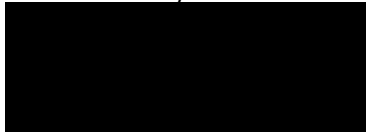
The Estate objects to the Five Estuaries Scheme on the following grounds;

- Inadequate consideration has been given to alternative substation locations which would have less impact on individual landowner interest; in particular no consideration has been given to a single substation to serve both Schemes.
- The Five Estuaries Scheme would lead to the unacceptable loss of grade 1 agricultural land
- The Five Estuaries Scheme would have an unacceptable detrimental impact on the Estate's farming operations.

The Estate objects to the compulsory acquisition of Estate land for the purpose of the Five Estuaries Scheme on the following grounds:-

- There is no need for the purposes of the Planning Act 2008 to compulsorily acquire the whole/any part of Estate land to deliver the Five Estuaries Scheme alone;
- There is no need for the purposes of the Planning Act 2008 to acquire the whole/any part of Estate land to deliver land required to facilitate or ancillary to the Five Estuaries Scheme alone;
- There is no compelling case in the public interest for the purposes of the Planning Act 2008 to acquire the whole/part of any Estate land for the purposes of the Five Estuaries Scheme alone. In particular;
  - (i) Alternative solutions (which might avoid sterilisation of this grade 1 agricultural land) have not been considered
  - (ii) there is no need for the proposed extensive landtake in order to mitigate landscape impacts of the substation;
  - (iii) There is no need to compulsorily acquire land to deliver onsite BNG.
  - (iv) The farming operations on Estate land would be unnecessarily and unacceptably disrupted as a result of the construction and operation of the Five Estuaries Scheme.
- It is not legitimate for the purposes of the Planning Act 2008 to take into account considerations relating to the North Falls Scheme when considering whether to confirm the Five Estuaries Scheme.

Yours sincerely



**CATHERINE HIBBERT**  
**For and on behalf of Holmes & Hills LLP**

Enc(s)