

We acknowledge the comments made by the Applicant in the document 'The Applicants' Responses to Relevant Representations' (Application Reference 10.3) in response to our submitted Relevant Representations. We can confirm that whilst discussions on reaching a voluntary agreement have continued since we made that submission, a binding agreement on the land has not been completed. We continue to object therefore to the Proposed Development. If the Applicant's assurances and proposed mitigations become legally binding we may then be in a position to withdraw our application. Our Relevant Representation is resubmitted as an attachment to this Written Representation.

6th September 2024

Relevant Representation (Objection) on behalf of Albanwise Synergy Limited (“ASL”) regarding:

Proposed Dogger Bank South Offshore Wind Farms (the “Projects”)

Proposed Dogger Bank South Offshore Wind Farms Order (the “Order”)

ASL is the renewable energy division of Albanwise Wallace Estates Limited (“AWEL”) and was incorporated in 2020. AWEL is a diversified UK investment group, founded in 1976. It operates in six established areas:

- managing farmland totalling 12,201 hectares;
- managing 102,000 residential ground rent interests;
- managing/developing mainly residential investment properties and various land parcels;
- managing and investing in renewable energy assets;
- engaging in environmental land management services; and
- offering property insurance to AWEL business units as well as to third parties.

ASL works to identify and realise new opportunities for investment in renewables, but also to manage AWEL’s existing interests in energy infrastructure. The division predominantly focusses on the following areas:

- Utility-scale renewables development;
- Operational asset management and energy procurement;
- Rapid charge hubs and electric vehicle charging networks; and
- Acquisition of freeholds with renewable energy tenants.

This representation is being made as the landowner of the parcels identified in Book of Reference, Volume 4, Application Reference: 4.2, belonging to Albanwise Synergy Limited as intending to be occupied either temporarily or for the life of the Projects. We are also representing the interests of the wider AWEL group of companies, who currently operate across this land, or have the potential to derive benefit from this land in the future.

The area of land that the Applicant is proposing to cross is known to us as the Risby estate, which in total covers approximately 1,072 ha of land. Agricultural tenants occupy approximately 708 ha of this land and the remainder is farmed in-hand. We are working in consultation with our tenants who may make their own representations on this proposal.

Approximately 4.6 kms northeast of the Risby estate lies the Routh estate which is also owned by the AWEL group. Routh covers approximately 1,194 ha and these two estates combined represent a major base of operations for AWEL, with significant components of the business

units referenced above based in this area. AWEL's interest in the Routh and Risby Estates is expanded below:

- Albanwise Synergy Ltd manages energy assets that are either self-developed or developed by third parties, across the estates. These include Statera's operational 50 MW gas peaking plant and 50 MW Battery Energy Storage Scheme (BESS) and the recently consented, combined 50 MW solar and 87MW BESS (planning refs: 21/02335/STPLF and 23/03926/STPLF respectively). There are also a number of energy assets at the Routh estate, namely the operational 24.6MW Hall Farm wind farm, the consented 50MW Field House solar farm (planning ref:22/00824/STPLF) and the 50MW Carr Farm solar farm, the planning application for which is currently being determined (planning ref: 22/03648/STPLF);
- Albanwise Farming Ltd farm 2,800 ha across Yorkshire, with a further 708 ha being farmed by agricultural tenants at the Risby estate. A regional hub of their farming activity is based at Routh, 7.8 km from the proposed application site, which also includes facilities for the drying and storage of up to 10,000 tonnes of grain onsite. The farming division also operate a 65,000 tonnes capacity grain drying and storing facility Full Sutton, 41km to the north of the site, which is a major regional farming infrastructure facility;
- Albanwise Environment Ltd have established the Leven Carrs wetland restoration approximately 10 km from the proposed Project. This is a 130 ha mix of wet fen and wet grassland habitats which supports a range of plant, bird, mammal and other species. This is in addition to other habitat management and improvement works being carried out in the area; and
- Abricot Ltd, AWEL's property development and management business unit, owns and manages several properties with residential tenants, in and around the estate. It has also promoted several parcels of land for development at the Risby estate in a recent call for sites to update the East Riding Local Plan.

With reference to Table 1-1 in the Schedule of Progress For Voluntary Land Interest Agreements, Volume 4 (Application Reference: 4.3), negotiations with the Applicant are ongoing and we believe that a satisfactory position can be reached. However, agreement of terms is still to be reached on:

- a. the form of agreement that will grant the Applicant access to the referenced land parcels; and
- b. the technical details regarding the installation, many of which are referenced below.

Feedback has been provided to the Applicant and their agent on these points, but no agreement has been reached and information and assurances are still outstanding. On this basis we must object to the proposed Project due to the potential level of impact to our business operations and the land which we hold. Our grounds for concern are detailed below, grouped into issues surrounding the use of land and those regarding the impact on farming operations.

Efficient use of the land

With reference to drawing ED13554-GE-1060, 'Works Plan (Onshore)' (pages 18 and 19) (Application Reference 2.6), and the Design and Access Statement Volume 8 (Application

Reference 8.8) and Environmental Statement Volume 7, Chapter 5 – Project Description (Application Reference 7.5).

We object to the scale and configuration of land that is intended to be occupied by the designs included in the proposal. We have requested, but are still to receive, written information from the Applicant justifying why the amount of land that is being occupied for the cable routes and converter stations as well as the ancillary and temporarily occupied land, is as proposed. Most notably, without further justification having been provided, we object to:

- a. the splitting of the cable route (Works no 32B) across twin paths, involving (but not limited to) land plots 18-054, 18-052, 19-003 and 19-007. Separating the cables by such a distance greatly increases the overall extents of the impact in the land and diminishes the prospects for further utilization of the land for any business interest of AWEL;
- b. to options that a single maximum extent of land has been applied for despite the application including scenarios that may only require the installation of half of the cables, converter stations or other ancillary equipment;
- c. the impact on the business operations (both farming or non-farming) of our tenants based on the layout of the project that is proposed. We currently have seven tenants on the Risby estates and four of these have land which is affected by the proposed development area and we want to ensure that their interests are sufficiently protected;
- d. the potential cumulative impacts arising from the interactions from the proposed Projects with those other major infrastructure schemes which are intending to cross our land near to the proposed Projects. These schemes include the Hornsea 4 Offshore Wind grid connection assets, National Grid's Greater Grid Upgrade which involves the expansion of the Creyke Beck substation, new transmission overhead lines and the creation of a new satellite station (Birkhill) adjacent to the existing substation. It is imperative that the Applicant engages with the owners of these other projects and to work collaboratively with ourselves to ensure an efficient and expeditious delivery of all the schemes, with minimal cumulative impacts, should the Order for the Projects be granted; and
- e. the impact on the wider estate. The Projects will also potentially blight other alternative energy schemes that we have been approached about over the land proposed to be affected, and this again will cause further potential financial losses if the Projects proceed.

Given the range of commercial interests, referred to above, that each of the business units of AWEL has, efficient use of the land is crucial for our continued commercial and environmental activity in the area.

Impact on farming operations

Pending agreement being reached with the Applicant we object to the proposal on the following grounds due to the potential for impact on our current and future farming operations across our land. This applies not only to general productivity and revenues arising from it but it may have a consequential impact on our ability to fulfill our obligations under supply contracts, which would lead to further loss.

- a. The occupation of land currently under Countryside Stewardship Schemes (CSS). A number of current CSSs lie within the Onshore Development Area. Removal or amendment to these schemes represents an administrative burden as well as the loss of revenue that comes with the allocation.
- b. The Projects cross our estate in such a way as to occupy awkward shapes of land and sever previously contiguous areas of farmland. This will disrupt farming activities in both the construction and operation phases of the Projects and lead in increased costs and time requirements for our farming unit.
- c. Impact on the soil/crop yields through compaction and contamination (from unintentional release of material and windblown dust arising from construction). These matters have the potential for reduced farming revenue for many growing seasons, if not permanently in the case of serious ground contamination. We need to reach agreement on the management of such matters and the mechanisms to resolve any potential impact.
- d. Impact on drainage systems. Over the last 10 years our farming business has invested over one million pounds in improving the drainage system across the Risby Estate. There must be agreement over installation methods, remediation works and potential compensation with respect to the existing drainage system to ensure that productivity of the land is maintained.
- e. Impact on crop growing. We grow a variety of root crops across the estate and there are a number of deep ploughing and other sub soil activities involved with the farming here. We need to reach agreement with the Applicant on matters such as trench depth and backfill composition, handling of soils during installation etc.
- f. We disagree with the ALC land grading presented in the Outline Code of Construction Practice, Volume 8, Appendix A - Outline Soil Management Plan (Application Reference: 8.9) therefore the presumption of productivity of the area of land intended for development.

Conclusion

ASL will continue to engage with the Applicant in an attempt to reach agreement on the acquisition of leaseholder, easement and temporary access rights. However, given the points of potential impact identified above and the reassurances that are still to be secured ASL must object to the Projects at this time and we reserve the right to make further representations during the course of the Examination should that be necessary.

Should the Examining Authority require any additional information in relation to this representation, please contact me on the details below.

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