

Chair, Members of the Examining Authority,

My name is [REDACTED], speaking on behalf of Boxford (Suffolk) Holdings Ltd, Boxford (Suffolk) Farms Ltd and Peake Fruit Ltd, who are affected landowners within the Order Limits of the Norwich to Tilbury DCO.

This representation is made alongside our position as set out in full in our Relevant Representation dated 16 February 2026.

## **1. Compulsory acquisition – extent and necessity**

First, on compulsory acquisition.

Our fundamental concern is that the powers and land rights being sought go beyond what is reasonably required to construct, operate and maintain the scheme.

Land has been included within the Order Limits:

- where the width of construction and safeguarding corridors appears excessive given the land use; and
- to allow for diversion of third-party electricity apparatus, without sufficient detail for the Examining Authority to be satisfied that this land is genuinely required.

Furthermore it is considered that the justification for avoiding the land to the south, being the safeguarding of mineral deposits has not been fully explored, specifically relating to the economic impact of the scheme.

## **2. Construction Impacts: Loss of Blueberry Plantation and Economic Consequences**

Turning to construction impacts, and in particular the proposed haul road and construction methodology.

The affected land supports an established blueberry plantation, forming part of an intensive horticultural operation supplying major UK retailers. Blueberries are highly sensitive to soil compaction, drainage and PH levels, and once the soil is damaged it cannot be readily remediated.

The proposed haul road and prolonged heavy trafficking in addition to the cable laying works, would, in practical terms, lead to the loss of the blueberry plantation within the affected area. This is not a temporary impact. Blueberry crops take many years to establish and reach full productivity, and their loss would result in:

- a long-term reduction in output;
- disruption to contracted supply arrangements; and
- significant economic consequences for the wider farming and packing business.

The suggested construction methodologies—whether excavation and stone placement or ground stabilisation using cement-based materials—pose serious risks to soil structure and

long-term fertility. Neither approach has been shown to be compatible with the future horticultural use of this land.

These impacts extend beyond crop loss alone. The blueberry crop is a vital part of certain supply contracts and underpins employment and packhouse throughput.

### **3. Reservoir and water-quality risk**

The reservoir immediately north of the construction area is not incidental. It is central to the viability of the entire farming and packing operation. It supplies irrigation water for soft fruit, stone fruit and glasshouse crops, all of which are grown for human consumption and supplied under long-term supermarket contracts.

Any contamination of this reservoir – whether by sediment, chemicals, cementitious material, fuel, or changes in groundwater behaviour – would result in:

- loss of usable irrigation water;
- potential contamination of crops;
- consequential losses across the wider business.

The mitigation described to date, including within the Outline Code of Construction Practice and Soil Resource Plan, does not adequately address this risk. Generic measures such as bunding and seeding are not sufficient.

Furthermore, it remains unknown whether the underground cable works will affect groundwater flows, and by extension the reservoir's long-term water levels and reliability.

### **4. Long-term impacts on irrigation and land use**

Beyond construction, the scheme creates permanent operational constraints.

Once the underground cable is installed, the farm's ability to:

- lay new irrigation pipes;
- adapt irrigation layouts; or
- respond to future climatic and production pressures

will be severely constrained, more costly, or rendered impractical. These impacts are not easily quantifiable, but they are real.

Similarly, overhead lines introduce expanded sterilisation due to health and safety constraints, restricting crop protection systems such as hail netting and tunnel-type structures that are essential to modern horticulture.

## **5. Conclusion**

In conclusion, Chair, our concerns are not theoretical, they are a very real threat to the group of companies, not only posing quantifiable risks, but those that are unknown.

We respectfully ask the Examining Authority to give these matters careful weight and to ensure that:

- only land that is strictly necessary is acquired;
- bespoke protections are secured for the reservoir and irrigation infrastructure; and
- the Applicant is required to provide site-specific, enforceable mitigation before any compulsory powers are granted.