

I object to the applicant's proposal to compulsorily acquire additional land as part of Change Request 1, on the grounds that this expansion of the order limits directly threatens the ecological integrity and hydrological stability of Minster Marshes, an area that forms part of the wider designated habitats connected to Pegwell Bay.

1. Impact on the Hydrology and Functioning of Minster Marshes

Minster Marshes depend on a stable groundwater regime and subtle water movements across the marshland. Any compulsory acquisition that enables construction traffic, ground compaction, or changes to drainage patterns near the marsh boundary risks altering water flow. Even minor alterations can degrade marsh ecology, reduce biodiversity, and cause long-term habitat loss. The application documents do not demonstrate that the marshes' hydrology will remain unharmed if the additional land is acquired and used for construction access.

2. Ecological Value of Minster Marshes

Minster Marshes form part of the ecological continuum supporting the SPA, SAC, and Ramsar designations across Pegwell Bay. They provide essential feeding and roosting grounds for birds and support invertebrate communities that contribute to the wider protected ecosystem. Expanding the order limits increases the likelihood of disturbance, noise, vibration, and habitat fragmentation. The applicant has not submitted adequate ecological baseline information to justify compulsory acquisition adjacent to such sensitive land.

3. Failure to Demonstrate Necessity and Proportionality

Under NPS EN 1 Section 4.11.1, compulsory acquisition must be clearly justified. The applicant has not shown that acquiring the additional land is essential for delivering the project. Nor have they adequately explored alternative access arrangements that would avoid encroachment near Minster Marshes. Without evidence that less damaging alternatives have been fully assessed, compulsory acquisition cannot be considered proportionate.

4. Risk of Irreversible Habitat Degradation

Construction impacts associated with use of the newly acquired land, such as soil compaction, heavy vehicle movements, and potential pollution, present a direct risk to marshland function. The marshes' ability to support wintering birds and specialist plant species is dependent on undisturbed ground conditions. No credible mitigation strategy has been provided that would prevent long-term ecological damage.

5. Cumulative Pressure on a Highly Sensitive Area

Minster Marshes already face pressures from surrounding land uses and past infrastructure works. Introducing additional development activity through new order limits increases cumulative harm. The change request documentation does not include a meaningful cumulative impact assessment relating to the marshes, contrary to Section 4.2.2.

Conclusion

The applicant has failed to justify the compulsory acquisition of additional land near Minster Marshes and has not demonstrated that the impacts on this sensitive marshland can be avoided or mitigated. Given the ecological importance of Minster Marshes and their role within the protected designations of Pegwell Bay, I urge the Examining Authority to:

Reject the proposed compulsory acquisition of land affecting Minster Marshes.

Require the applicant to reassess alternative access routes that avoid harm to marshland habitats.

Insist on full hydrological and ecological assessments before any acquisition is considered.

This proposal, as submitted, does not meet the tests of necessity, proportionality, or environmental protection required for compulsory acquisition.