Generic protection standards for unprecedented development

The Outline Soil Management Plan, Kent (7.5.10.2) and the Applicant's responses treat sensitive marsh soils of the former Wantsum Sea Channel in a generic manner. Development on a former sea channel that is now fresh water is unprecedented globally.

We have farmed this land using min-till methods for 15 years, which has built and preserved soil structure, organic matter and biodiversity. The current generic approach does not reflect this or the unique alluvial marsh soil characteristics.

The temporary haul road is designed to support heavy construction traffic for up to 5 years.

To prevent heavy vehicles from sinking into the soft soil, National Grid proposes a layered "floating" road design:

- **Depth:** The road profile is approximately **0.2m to 0.7m deep**
- **Layers:**
    1. **Geotextile Membrane:** A heavy-duty fabric laid directly on the arable soil to separate the stone from the clay.
    2. **Geogrid Reinforcement:** A plastic grid to distribute the weight of heavy loads.
    3. **Aggregate Base:** 400mm–600mm of compacted stone (Type 1 MOT) to form the running surface.
- **Drainage Implication:** This road is **impermeable**. Rainwater will not soak through it; it will sheet off the sides immediately.

2. Temporary Drainage Ponds

Because the road sheds water rapidly, National Grid proposes digging temporary ponds alongside the haul road in the arable fields.

- **Design:** The attenuation ponds, typically **1m–1.5m deep**, lined with a synthetic liner to prevent groundwater ingress from below.
    - **Capture:** Runoff from the road is directed into these ponds.
    - **Settlement:** The water sits for a set period to allow silt to settle.
    - **Discharge:** A small pipe (flow control device) releases the "clean" surface water into local ditches at a **"greenfield runoff rate"** (approx. 2–5 litres per second per hectare).

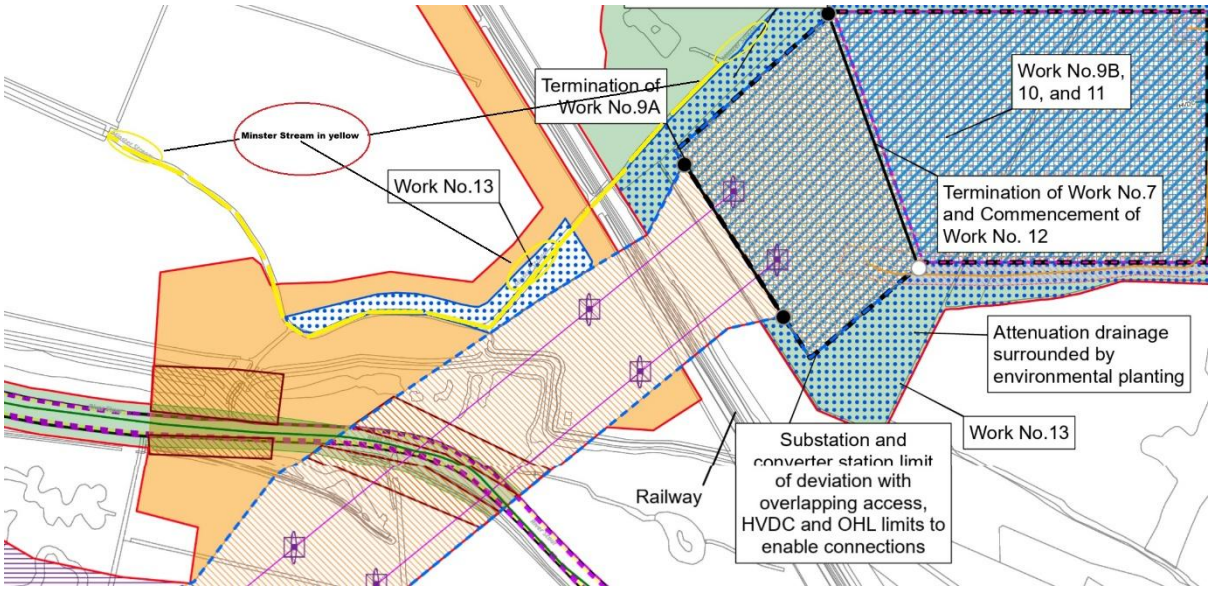
Failure Point	Technical Issue	Practical Consequence
Groundwater Hydraulic Lock	The high water table (as seen in Feb 2026 floods) exerts upward pressure.	If you dig a pond, it fills with groundwater from below before it can take any road runoff. If you line it, the pressure can "pop" the liner (hydrostatic uplift).
Discharge Blockage	The receiving ditches (Minster Stream network) are	The ponds cannot discharge their water because the stream level is higher than the pond outlet. The ponds act as "storage tanks with no drain,"

	often full during winter.	eventually overflowing back onto the haul road or fields.
Soil "Pudding"	The clay soil loses structure when wet and trafficked.	Construction vibration on wet clay turns the soil next to the road into liquid mud ("thixotropy"). This mud slides into the drainage swales, blocking them and forcing water to pool on the arable land, destroying crops and soil structure.

Requirements:
An ALS soil survey has only recently been conducted. I request that the results of this survey (together with any further intrusive ground investigations under REAC GH01) are applied to produce a detailed, site-specific reinstatement plan.This plan must be submitted, consulted on and secured in the final CEMP, updated Outline Soil Management Plan before the end of the DCO process (and before any works commence)

It should include:
pre- and post-construction soil testing and monitoring specific to min-till practices;
tailored handling, storage and reinstatement methods to protect soil structure;
full reinstatement of field drainage and avoidance of compaction or salination; and
independent verification that the reinstated soil meets or exceeds its pre-construction condition.

Attenuation pond sits directly over the Minster Stream
The Kent Drainage Strategy (9.17.2) and indicative plans (CR1-025) show permanent attenuation basins (including PC-09-ATPN and PC-11-ATPN) directly over the Minster Stream. This of course will not be possible to install, and there does not appear to be a practical place for the ponds to go.



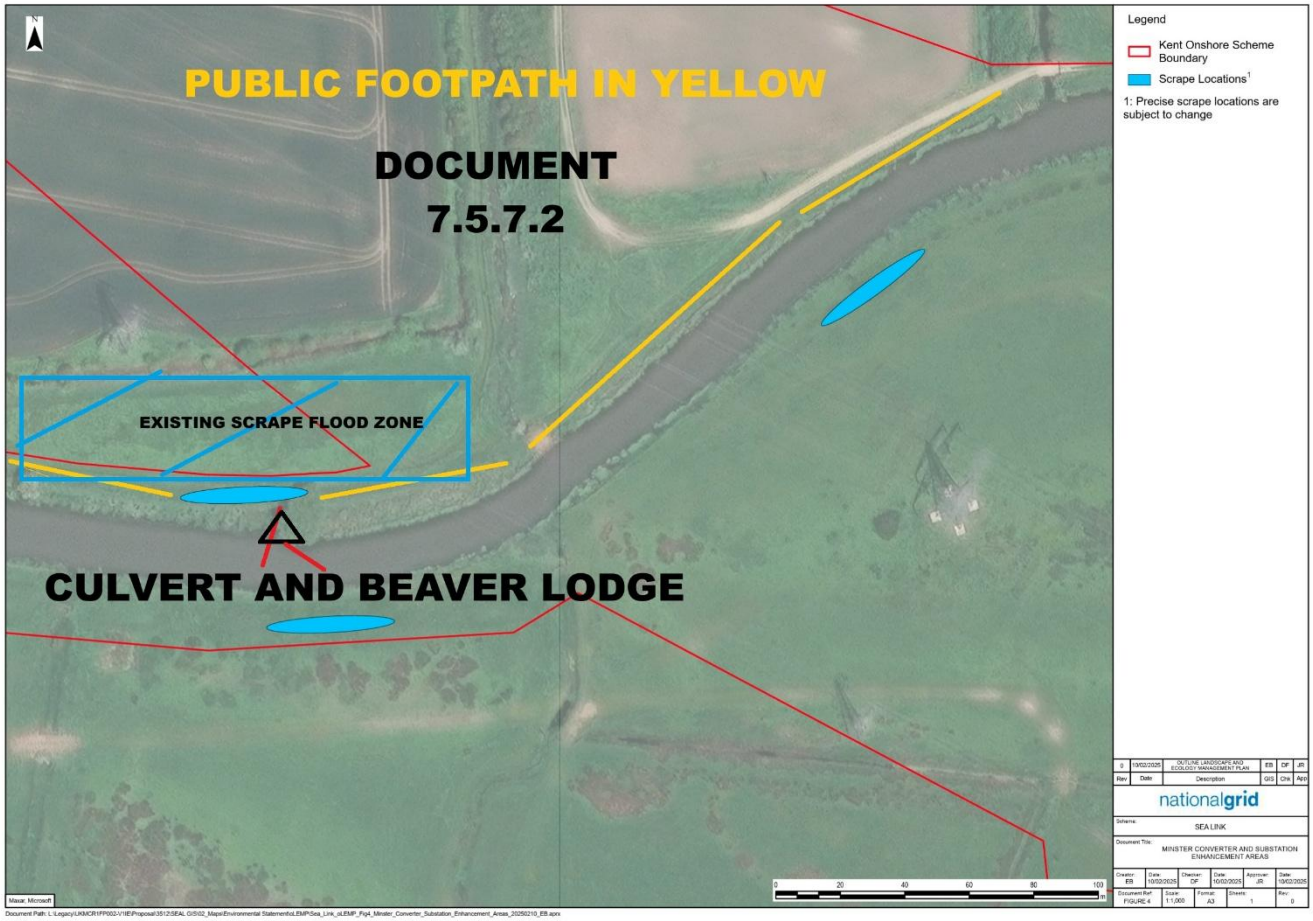
Requirements:
Full details on how the drainage is proposed without collapsing banks of Minstr Stream. Reinstatement of soft alluvial soil that has been in min-till for 15 years will be returned to original condition following deep compression of water in anaerobic conditions?
How water will be removed from ponds when full to prevent flooding?
SuDS was refused on adjacent BESS applications due to high water table.

Higher Level Stewardship and Sustainable Farming Incentive
Existing wetland scrapes adjacent to the River Stour and temporary bridge crossing
My HLS/SFI agreements include wetland scrapes north of the River Stour (Abbey Farm Wetland) that we actively manage for biodiversity in an agreement with Natural England.

The temporary clear-span bridge over the River Stour, associated haul roads and construction traffic will directly affect these scrapes. The Applicant's response (9.36 Table 19.1, point WR-REP2-101.05) states that schemes "will not be impacted" or will be covered by the Compensation Code, but provides no site-specific plan for protection of my existing scrapes wildlife during bridge works, pre- and post-construction monitoring.

Requirements:
I request a site specific Construction Method Statement for the bridge crossing (with measures to avoid damage to existing scrapes and river bank (Nemo Link left lasting damage)), updated REAC entries for monitoring and reinstatement of scrapes to the same or better condition.

Proposed new wetland scrapes (600 m² with riparian planting) mapped on a public footpath
The oLEMP, Kent (7.5.7.2(C), Section 5.3 and Figure 4) proposes three new shallow scrapes (total ~600 m²) along the River Stour (grid references TR 30665 62754 to TR 31176 62863) as BNG enhancement (REAC B52). These have been mapped directly overlapping a public footpath (PRoW TE26 north bank and/or EE42 south bank). The proposed scrape is also too close to existing scrapes which flood the whole area when the River Stour is at high levels. The wetland was specifically designed to be optimal for biodiversity by Natural England – any addition to it is not a biodiversity increase.



Requirement:
Relocation of the new scrapes off the public footpath (and away from conflict with my existing HLS scrapes).

Salt contamination and reservoir protection, request for direct notification
In my REP2-101 (points .02, .04, .06) and earlier representations I raised risks of salt mobilisation and heavy-metal contamination from the buried salt layer in Wantsum Sea Channel soils, boreholes, dewatering and excavation, with potential permanent impacts on my irrigation reservoirs and fresh-produce water supply.

Geological register Borehole Reference: TR26SE8 West Stourmouth (within Wantsum Channel) shows how salt can intrude into fresh water on the marshes:

Page 29 (Conclusions on resource availability and risks):

"It has been shown that the groundwater resource available at West Stourmouth is very much less than that had been previously supposed. An underflow from the Wingham and Little Stour outcrop areas of no more than ***2.5 Ml/d*** *could be utilised. Any abstraction in excess of this amount would derogate river flows at the southern edge of the marshes. Furthermore, the* ***highly saline groundwater at Plucks Gutter*** *would be rapidly drawn in, and there might even be the risk of* ***sea water intrusion*** *from the east coast. At 2.5 Ml/d, it is unlikely that river flows would be derogated, but the quality problem would remain to some extent. The abstraction borehole is located only a couple of kilometres west of Plucks Gutter, and its*

cone of drawdown would undoubtedly induce flow from that direction (a fissure connection between the two locations was proved by geophysical logging).”

Any construction activities, dewatering, piling, cable trenching, or changes in groundwater pressure associated with the Sea Link project could reduce this protective underflow and trigger the exact saline intrusion risks identified in the 1975–1980 BGS study. Once saline water is drawn in, it is extremely difficult to reverse. It also shows how complex the connection of fissures are belowground.

The Applicant’s responses rely on generic REAC commitment GH08 (unexpected contamination protocol), the Qualitative Groundwater Risk Assessment and general CEMP pollution controls, but contain no site specific risks and no commitment to notify me (or other affected marsh landowners) directly.

Requirement:
I request a new REAC entry (or amendment to GH08) requiring the Applicant to notify me immediately of any suspected contamination event, saline material encounter or dewatering that could affect water quality. Timely notification will prevent damage to reservoirs and agricultural land as we can switch off pumps.

Water for irrigation
Claim in 9.17.2(B), Paragraph 6.3.5 (Section 6.3 Runoff Destination):

"The Applicant has also held early discussions with interested parties who may benefit from the water being used as a source of irrigation for agricultural land in the near vicinity to the project."

Requirement:
Please confirm how water will be available for irrigation and if at all possible as this point has not be raised with farmers.