From: [redacted]
To: secretary.state@energysecurity.gov.uk
Cc: correspondence@energysecurity.gov.uk; South East Anglia Link; TDC Planning Services; consultations@naturalengland.org.uk; Enquiries, Unit
Subject: Sea Link DCO – Strong Objection to Development of Minster Marshes and Concerns Regarding Pre-Consent Works
Date: 29 August 2026 10:30:31

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I respectfully request that this correspondence is placed before the Secretary of State and considered insofar as procedurally permissible in determining Sea Link DCO application EN020026.

Dear Secretary of State,

I am writing regarding the proposed Sea Link development and, specifically, the proposed converter station and associated infrastructure at Minster Marshes in Kent.

I wish to make clear from the outset that I strongly object to the development of Minster Marshes.

I recognise that the United Kingdom needs investment in its electricity transmission network and infrastructure capable of supporting lower-carbon energy generation. I am not opposed to that objective.

What I cannot accept is that achieving it should require the permanent industrialisation and fragmentation of an established marshland landscape of ecological, archaeological, historic and environmental importance without it first being convincingly demonstrated that brownfield, previously developed or otherwise substantially less damaging alternatives cannot reasonably accommodate this infrastructure.

Works taking place before the DCO decision

I am also deeply concerned by the scale of activity now taking place at the proposed converter station site before the Development Consent Order has been determined.

National Grid may maintain that construction of Sea Link itself has not commenced. However, for local residents observing what is happening on the ground, the distinction is becoming increasingly difficult to reconcile with the scale of the works taking place.

Substantial temporary access arrangements are being installed. Ground matting has been laid to create access routes, heavy machinery and contractors have been present for weeks, and temporary crossings or bridges are being installed across drainage features within this sensitive marshland environment.

Most importantly, this is no longer simply a matter of people carrying out preliminary archaeological surveys.

Thanet District Council planning application F/TH/26/0505 permits archaeological mitigation works on land east and west of Ebbsfleet Lane North, including soil stripping, excavation, archaeological recording, subsequent reinstatement and associated temporary works.

National Grid itself describes machinery removing and storing soil while archaeologists record and remove archaeological features uncovered.

There is an important distinction between archaeological investigation, which establishes what is present, and archaeological mitigation involving excavation and removal.

Archaeology which could otherwise represent a constraint upon construction is therefore being dealt with on the proposed converter station site before a decision has been made on whether that converter station should be permitted.

I respectfully ask:

Why is archaeological mitigation being undertaken on the proposed converter station site before the Secretary of State has determined whether the development requiring that mitigation should be allowed at all?

The cumulative appearance of a fait accompli

I appreciate that individual preparatory activities may each have their own lawful justification.

My concern is their cumulative effect.

Viewed individually, archaeological excavation can be described as archaeological mitigation; ground matting as temporary access; crossings as temporary works; ground investigations as surveys; and other activities as preparatory.

Viewed together, however, they create the deeply troubling appearance that the

proposed converter station site is progressively being made ready for development while the development itself remains awaiting determination.

This risks creating the appearance of a fait accompli.

I therefore ask that the cumulative scale and timing of all pre-consent works at Minster Marshes are considered and that the Secretary of State satisfies herself that they have neither prejudiced the determination of the application nor progressively removed archaeological, ecological, hydrological or logistical constraints which ought properly to remain relevant to that decision.

Money already spent should not be a reason to grant development consent.

Preparatory work already undertaken should not be a reason to grant development consent.

Archaeology already excavated should not be a reason to grant development consent.

Infrastructure already brought onto the land should not be a reason to grant development consent.

The application should be determined as though National Grid had not spent a single pound preparing its preferred site for its preferred outcome.

The ecological importance of Minster Marshes

Minster Marshes is not ecologically insignificant or empty land.

It forms part of a connected wetland landscape of drainage ditches, wet grassland, fields and hedgerows which together provide feeding, resting, breeding, sheltering and movement habitat for wildlife.

National Grid's own environmental work has required surveys and consideration of species including water vole, otter, beaver, bats, dormice, breeding birds and wintering birds.

Of particular concern are the bird populations using this landscape.

Kent Wildlife Trust has highlighted the importance of land at Minster Marshes as functionally linked land associated with the Thanet Coast and Sandwich Bay Special Protection Area.

Earlier environmental survey information recorded a peak of more than 700 golden plover using fields in the area proposed for the converter station/substations. Kent Wildlife Trust subsequently raised concerns that a lower peak figure of 370 golden plover was used in the final Environmental Statement when calculating compensatory habitat requirements.

Whatever the explanation for that difference, both numbers demonstrate something extremely important:

Hundreds of birds from a single species can depend upon these fields.

This must also be viewed against the wider decline in British wildlife. Species of serious conservation concern associated with farmland, wetland and coastal habitats in this part of Kent include Red-listed birds such as lapwing, skylark, linnet, yellowhammer, grey partridge and starling.

The importance of this landscape therefore extends far beyond individual animals discovered during ecological surveys.

The drainage network is habitat

I am particularly concerned about works taking place within and around the drainage network at Minster Marshes.

These ditches should not simply be regarded as obstacles to construction or channels for moving water.

They are habitat.

They provide aquatic and bankside habitat, feeding opportunities and movement corridors while also helping determine the water conditions upon which the surrounding marshland depends.

They are potentially important to legally protected species such as water voles and form connections between different areas of habitat throughout the marshes.

Against this background, the installation of substantial ground matting, heavy machinery and temporary crossings of drainage features before the Sea Link DCO has been determined deserves particularly careful scrutiny.

I ask the Secretary of State to satisfy herself that these pre-consent activities have

not damaged, fragmented or otherwise altered habitats which formed part of the ecological baseline against which the environmental consequences of Sea Link were assessed.

If ecological conditions on the proposed development site can be altered by works undertaken while the application remains undecided, there is an obvious question about how the original environmental baseline can subsequently be relied upon when assessing the consequences of development.

An ecosystem cannot simply be moved somewhere else

The ecological importance of Minster Marshes cannot properly be understood by considering each species, ditch, hedgerow or field independently.

These features operate together as an ecosystem.

Changes to drainage, water flow, ground levels, soil structure or the physical structure of ditches can affect considerably more than the precise location where works occur.

Heavy machinery and access routes can compact soils and change how rainfall infiltrates or runs across land. Increased or redirected runoff can carry sediment into watercourses. Changes which make areas wetter or drier can alter vegetation and the invertebrate communities characteristic of wetland environments.

Those effects can then travel through the food web.

Plants and wetland vegetation support invertebrates.

Invertebrates provide food for birds, bats and other animals.

Ditches and their banks provide habitat and connectivity for aquatic and terrestrial wildlife.

Wet fields provide feeding and resting areas for birds.

Hedgerows and vegetated corridors allow wildlife to move between habitats.

Remove or significantly degrade enough pieces of that network and the consequence is not simply the displacement of individual animals. The landscape becomes fragmented, leaving wildlife with smaller feeding areas, fewer breeding opportunities and poorer connections between remaining habitats.

A habitat does not have to disappear completely before it ceases to function effectively.

Noise, artificial lighting, repeated disturbance, vegetation clearance, changes in water conditions and substantial new infrastructure can cumulatively make previously suitable habitat less usable.

The golden plover numbers demonstrate this point particularly well. The value of these fields is not merely the number of hectares on a map; it is their ability to provide sufficient open and connected land for significant numbers of birds to feed and rest.

Creating the same number of hectares somewhere else does not guarantee those birds will use it.

Likewise, a newly excavated drainage channel is not immediately ecologically equivalent to an established ditch.

New planting is not immediately equivalent to mature habitat.

A replacement field is not necessarily ecologically equivalent merely because it has the same area.

Habitat creation is not instantaneous ecosystem creation.

Restoration can take years or decades to acquire ecological complexity, and displaced wildlife does not simply wait somewhere safely until replacement habitat has matured.

Why this matters beyond the development boundary

Minster Marshes also does not exist as an ecological island.

It forms part of the wider Wantsum, Thanet and Sandwich Bay landscape. Wildlife does not recognise the boundaries of a planning application.

Birds, bats, mammals and other species move between feeding, breeding, resting and sheltering areas throughout this wider network.

The relevant question is therefore not simply how many hectares would physically disappear beneath infrastructure.

It is:

What ecological role does this land currently perform within the wider landscape, and what happens to that network when it is fragmented or permanently altered?

This becomes increasingly important as development pressure removes and fragments other habitats.

Every surviving connected habitat becomes more valuable as surrounding habitat disappears. Continued incremental losses can eventually leave remaining areas too small or disconnected to perform their former ecological functions.

Healthy wetland landscapes also provide benefits extending beyond wildlife. They can store and slow water, support healthy soils, retain carbon, trap sediment and pollutants, support insects and contribute to resilience against increasingly extreme weather.

Protecting Minster Marshes is therefore not simply about protecting individual animals.

It is about protecting the functioning natural system upon which those animals – and the wider landscape – depend.

An ecosystem is a network, not a collection of interchangeable pieces.

Why is brownfield land not being prioritised?

This brings me to my fundamental objection.

Before nationally significant infrastructure is permitted to permanently transform a functioning wetland landscape, brownfield and previously developed land should be comprehensively exhausted as alternatives.

I therefore ask the Secretary of State to scrutinise National Grid's consideration of alternative locations particularly carefully.

The relevant test should not merely be whether National Grid's preferred location is technically capable of accommodating a converter station.

The question should be:

Has it genuinely been demonstrated that meeting the national need for Sea Link

requires this level of permanent harm to Minster Marshes when compared with every reasonable, technically feasible and substantially less environmentally damaging alternative?

If brownfield or previously developed alternatives require different engineering, additional cable routing or greater expenditure, those consequences should still be weighed properly against the permanent environmental cost of sacrificing an established marshland ecosystem.

Convenience and cost should not automatically outweigh irreversible environmental loss.

We cannot continually acknowledge a biodiversity crisis while treating surviving functioning habitats as expendable whenever development elsewhere is more difficult or expensive.

We cannot protect archaeological heritage simply by excavating it, recording it and removing it from the landscape which gives it context.

And environmentally responsible energy infrastructure cannot simply mean that the purpose of the infrastructure is environmentally beneficial while disregarding the environmental consequences of where it is built.

The transition to a lower-carbon energy system should not require us to choose between addressing climate change and protecting biodiversity. We should be capable of doing both.

Please protect Minster Marshes

Minster Marshes is also part of the extraordinary historic Wantsum landscape – a place where the physical landscape records the changing relationship between the Isle of Thanet and mainland Kent.

Its archaeology, waterways, drainage landscape, habitats and wildlife have developed over generations.

Infrastructure has a lifespan.

A landscape destroyed cannot simply be replaced when that infrastructure eventually becomes obsolete.

For all these reasons, I strongly object to the proposed converter station and

associated infrastructure being constructed on Minster Marshes.

I ask that development consent is refused unless it can be demonstrated convincingly that there is no reasonable, technically feasible and substantially less environmentally damaging alternative.

And I ask that the activity already taking place at Minster Marshes is not allowed, consciously or otherwise, to influence that fundamental decision.

Minster Marshes should not have to prove why it deserves to survive.

The developer should have to demonstrate why its destruction is genuinely unavoidable.

The decision about the future of Minster Marshes has not yet been made.

Please protect it while there is still something left to protect.

Yours faithfully,

Chelcie Rowe
Margate, Kent

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