From: Chelcie Rowe
Sent: Wednesday, September 16, 2026 16:43
To: Enquiries, Unit
Cc: South East Anglia Link
Subject: Fw: Re: 260904/SM03 FW: Sea Link DCO – Strong Objection to Development of Minster Marshes and Concerns Regarding Pre-Consent Works

> You don't often get email from [redacted]

[redacted] of State,

Further to my correspondence below, please could the following supplementary representation be added to my original submission and forwarded to the appropriate team for consideration before determination of Sea Link EN020026.

I am writing further to my previous representation concerning Sea Link (EN020026) and the proposed development at Minster Marshes, receipt of which was acknowledged on 4 September 2026 and which I understand was passed to the relevant local team.

Please could this supplementary representation be associated with my original correspondence and considered, insofar as procedurally permissible, before the Secretary of State determines the Sea Link Development Consent Order.

I wish to raise an additional concern regarding major-accident risk and, particularly, the potential consequences of an incident for the ecologically sensitive Minster Marshes and surrounding Richborough landscape.

I understand that energy and industrial infrastructure already exists, or has been consented, within the wider Richborough area, including anaerobic digestion/gas-related infrastructure and battery energy storage, while Sea Link proposes a major 2 GW converter station and associated electrical infrastructure.

I am aware that the applicability of the Control of Major Accident Hazards Regulations 2015 (COMAH) depends upon the particular dangerous substances and quantities present at an establishment. I therefore do not presume that every facility in the area constitutes a COMAH establishment.

However, this makes it particularly important that the Secretary of State is satisfied that the current cumulative major-accident risk presented by existing, consented and proposed infrastructure in the Richborough/Minster area has been comprehensively assessed using an up-to-date baseline.

In particular, I ask whether the final assessment has adequately considered potential interactions or domino effects involving the proposed converter station/substation and nearby:

- anaerobic digestion and biogas infrastructure;
- gas storage or processing infrastructure where applicable;
- battery energy storage facilities;
- other electrical and energy infrastructure; and
- any establishment falling within the scope of COMAH or other relevant major-hazard legislation.

I would also ask that this assessment is not confined to the potential consequences for human receptors.

Minster Marshes itself is an important receptor

A major industrial accident can potentially have environmental consequences through fire, thermal radiation, blast overpressure, debris, smoke and combustion products, release of contaminants and contaminated firefighting water or runoff.

Those consequences are particularly concerning beside a hydrologically connected wetland environment.

As set out in my previous representation, Minster Marshes comprises an interconnected system of drainage ditches, wetland habitat, fields and vegetation supporting significant wildlife populations.

National Grid's own environmental work has considered protected and notable wildlife including water vole, otter, beaver, bats, dormice and breeding and wintering birds. The wider ecological concerns include functionally linked land associated with the Thanet Coast and Sandwich Bay Special Protection Area and fields used by substantial numbers of golden plover.

An accident therefore does not need to reach someone's home before it becomes environmentally significant.

If a credible accident scenario could result in thermal radiation, blast effects, pollution or contaminated runoff reaching the marshes, drainage network or other important habitat, those ecological receptors and pathways must form part of the assessment.

This is especially important because contamination entering a connected drainage system may not necessarily remain confined to the immediate location of an incident.

I therefore respectfully ask the Secretary of State to establish:

1. Whether the final Sea Link major-accidents and disasters assessment uses an up-to-date inventory of existing and consented energy and industrial developments around Richborough and Minster.

2. Whether appropriate consultation has taken place with the Health and Safety Executive, Environment Agency, Natural England and relevant fire and rescue authorities concerning cumulative and domino-effect risks.

3. Whether site-specific modelling has established credible thermal-radiation, blast-overpressure, fire and pollution consequence distances associated with relevant neighbouring installations.

4. Whether those consequence areas overlap the proposed converter station, associated electrical infrastructure, Minster Marshes, its drainage network or other ecologically important land.

5. Whether the assessment considers ecological receptors and environmental consequences, rather than concentrating principally upon risks to human health and buildings.

6. Whether credible accident scenarios involving firefighting water, contaminated runoff or other pollutants entering the interconnected drainage network have been considered.

7. Whether recently consented or developed infrastructure around Richborough has materially changed the baseline used when Sea Link's environmental assessment was originally prepared.

Cumulative concentration of energy infrastructure

I would also ask that the cumulative concentration of energy infrastructure at Richborough is considered consistently.

Proximity to existing energy infrastructure may provide engineering and economic advantages when selecting a location for Sea Link.

However, that same concentration of infrastructure must also be considered as a potential source of cumulative and interacting risk.

It would not be reasonable to treat proximity to existing infrastructure as an advantage when justifying the location while failing to give equivalent weight to any additional safety or environmental consequences arising from that proximity.

This is particularly relevant where several different regulatory and planning regimes apply to neighbouring developments. Considering individual installations separately must not result in the combined risk of the overall concentration of infrastructure falling between regulatory responsibilities.

Ecological consequences matter even where human risk is limited

I am particularly concerned that major-accident risk should not effectively become synonymous with risk to human life alone.

Minster Marshes is itself a valuable environmental receptor.

A fire, explosion or pollution incident capable of damaging wetland vegetation, killing or displacing wildlife, contaminating drainage channels or affecting feeding and resting habitat would represent a serious environmental consequence even if the risk to nearby residents were considered acceptable.

This is particularly important where protected or declining species and significant bird populations depend upon the wider marshland system.

As I stated in my original representation:

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

Damage to one part of a hydrologically connected wetland can have consequences beyond the immediate location of an incident.

Precaution before an irreversible decision

I am not suggesting that the existence of neighbouring energy infrastructure automatically makes Sea Link unsafe.

I am asking that, before development consent is granted, the Secretary of State is satisfied on robust, site-specific and current evidence that the combined risks have been identified, modelled and found acceptable – including risks to the environment.

This matters particularly at Minster Marshes because, as set out in my previous representation, I fundamentally object to placing this major industrial development within an established and interconnected marshland ecosystem when brownfield, previously developed or otherwise substantially less environmentally damaging alternatives should first be exhausted.

The possibility of a major accident adds another dimension to that concern.

It is not sufficient to assess what is likely to happen during normal operation.

The decision must also consider what could reasonably happen when something goes wrong, however unlikely that event may be, and what the consequences would be for an irreplaceable environment.

If there is uncertainty regarding the cumulative safety implications of concentrating this infrastructure around Richborough, I respectfully submit that those questions should be resolved before, rather than after, development consent is granted.

I therefore request that this supplementary representation is considered alongside my previous correspondence before the Sea Link DCO is determined.

I would be grateful for confirmation that this supplementary representation has been received and passed to the appropriate team dealing with the Secretary of State's determination.

Yours faithfully,

Chelcie Rowe
Margate, Kent

Sent from Outlook for Android

From: Enquiries, Unit <enquiries@environment-agency.gov.uk >
Sent: Friday, 04 September 2026 13:22:33
To: [redacted]
Subject: 260904/SM03 FW: Sea Link DCO – Strong Objection to Development of Minster Marshes and Concerns Regarding Pre-Consent Works

Good afternoon Chelcie,

Thank you for your email.

I have passed this to the local customer team who will deal with your request.

If your request for information falls under either the Freedom of Information Act or Environmental Information Regulations, we must respond to you within 20 working days.

You can find more information about our service commitment by clicking on the link below:

https://www.gov.uk/government/publications/environment-agency-customer-service-commitment

You can contact our customer team directly on the contact details below or call the National Customer Contact Centre on 03708 506506 who will transfer you to the area team.

Please quote your enquiry reference 260904/SM03 in any correspondence with us regarding this matter.

Customers & Engagement Team
Environment Agency

Kent, South London & East Sussex Area

KSLE@environment-agency.gov.uk

Regards

Steven Middleton

[redacted] Service Advisor

Environment Agency: Contact Centre Services - Part of Strategy, Transformation & Assurance (STA)

Tel: [redacted]

Hours : 0900 – 1704

: Web Site: www.gov.uk/environment-agency

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Tell us how we did

To help improve your customer experience with us, we are currently gathering feedback. If you would like to take part in a short customer satisfaction survey, please click the link below and you will be directed to complete an online survey. The survey is anonymous and takes around 5 minutes to complete.

[redacted]

From: Chelcie Rowe [redacted]
Sent: 29 August 2026 10:30
To: secretary.state@energysecurity.gov.uk
Cc: correspondence@energysecurity.gov.uk; South East Anglia Link <southeastanglialink@planninginspectorate.gov.uk >; TDC Planning Services <planning.services@thanet.gov.uk >; SM-NE-Consultations (NE) <consultations@naturalengland.org.uk >; Enquiries, Unit <enquiries@environment-agency.gov.uk >
Subject: Sea Link DCO – Strong Objection to Development of Minster Marshes and Concerns Regarding Pre-Consent Works

You don't often get email from [redacted]

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

Sent from Outlook for Android

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