



HOUSE OF COMMONS  
LONDON SW1A 0AA

12 March 2026

Stephen Wheeler  
Managing Director  
cc Alan Greenwood  
Stake Holder Engagement Manager  
SSE Renewables Ltd  
Inveralmond House  
200 Dunkeld Road  
Perth PH13QA

Dear Stephen,

**Re: Protecting the Drainage Systems on Romney Marsh — Your Proposed NSIP Solar Development  
Shepway Energy Park at Newchurch**

Further to previous correspondence about your proposed solar development at Newchurch, I am writing to set out my further concerns around drainage and related issues.

I have been approached by a significant number of my constituents, by the Romney Marsh Area Internal Drainage Board (RMAIDB), and by local campaign groups with serious concerns about the impact of your proposals on the Marsh's drainage infrastructure. I would be grateful if you would respond substantively to each of the questions set out in this letter.

## **Geographical context to drainage issues**

Romney Marsh is one of the most unique landscapes in England. Reclaimed from the sea over many centuries, this low-lying wetland peninsula sits largely below the high-water mark and owes its very existence to an extraordinary feat of sustained human engineering. Its distinctive character — flat, wide, threaded with ditches and dykes — is inseparable from the drainage system that keeps it habitable. In 1252, the future Henry III granted the *Charter of Romney Marsh*, the first official recognition of an organised drainage system anywhere in England. That charter gave elected Jurats of the Marsh the power to levy rates for the maintenance of sea defences and land drainage, laying the foundations of what became the "Laws and Constitutions of Romney Marsh" — a body of practice so effective that, when Parliament introduced statutory Commissions of Sewers in 1531, Romney Marsh was expressly exempted on the basis that its system already worked. The network of sewers, sluices and outfalls that drains the Marsh today is the living descendant of that medieval achievement. It is also deeply fragile.

### **1. The drainage system**

The drainage infrastructure of Romney Marsh is unique in its age, complexity and continued operational importance. The RMAIDB currently maintains approximately 220 miles of watercourses, operates five pumping stations and oversees 140 water-level control structures across a drainage district covering over 33,000 hectares. The drainage system serves a dual purpose: in summer it retains water to support arable

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and livestock farming; in winter it is the primary defence against flooding for land that is, in significant part, below sea level.

The network is both dense and interconnected. A complex web of ditches drains water through sluices and outfalls into the Royal Military Canal and ultimately to the sea. Crucially, damage to one part of the system can rapidly create cascading failures elsewhere across the Marsh. In addition to the mapped IDB network, individual fields are served by their own drainage arrangements, including unmapped clay pipe systems that provide field-by-field drainage of considerable antiquity and fragility.

The Marsh discharges into Environment Agency-maintained main rivers, meaning the RMAIDB and the Environment Agency are jointly responsible for the integrity of the overall system under the Land Drainage Act 1991 and the Flood and Water Management Act 2010.

## **2. Fragility and ongoing threat from disrupting drainage system**

The drainage network has come under exceptional strain in recent months.

In January 2026, Storm Goretti caused severe flooding and storm damage to defences along the Lydd coastline. Hundreds of acres were inundated, causing salination that introduced salt water into the freshwater drainage system, with damaging consequences for both agriculture and aquatic habitats. A number of the proposed solar development sites were themselves under water during this period, which must inform your assessment of baseline risk. The Marsh's designation as Flood Zone 3 — the highest risk category — makes this not a theoretical concern but an operational certainty.

I note that Romney Marsh and the wider Dungeness area is also subject to a range of European and national environmental designations, including Dungeness SAC, Dungeness to Pett Level SPA, and the Dungeness, Romney Marsh and Rye Bay SSSI and RAMSAR site. Any impact on drainage quality or hydrological function has the potential to affect these internationally protected habitats.

## **3. Construction Damage**

The RMAIDB has expressed strong concern to me that roads flanked by watercourses — which describe much of the Marsh's highway network — are likely to suffer disproportionate damage from construction traffic, particularly when water levels in the land drainage system are raised and ground conditions are saturated. Movement of heavy vehicles over waterlogged ground risks bank failure in the adjacent drainage channels, with consequent effects on the highway itself and an increase in flood risk to adjacent land.

These concerns are not hypothetical. The construction of the Sycamore Solar farm at Old Romney has provided a deeply concerning precedent. I understand that construction was extended into the winter months in order to meet a commercial viability deadline, and that work therefore proceeded during wholly inappropriate ground conditions. The consequences were serious: watercourses were heavily polluted with site run-off and silt, aquatic habitats were badly damaged, and substantial remedial works were required to restore the drainage network to an acceptable condition.

**Q1. What is your view on the risk of construction-traffic damage to watercourse banks on the Marsh, and what specific measures are proposed to prevent it?**

**Q2. What lessons have you drawn from the construction problems at the Sycamore Solar development in Old Romney, and how have those lessons informed your risk assessments and preparatory work for this project?**

## **4. Construction Duration and Seasonal Constraints**

Restricting construction to the summer water-retention season — when ground conditions and drainage levels are lower — is widely regarded as the appropriate mitigation for bank-failure risk on the Marsh. However, confining all construction activity to that season would substantially extend the overall construction programme. This creates significant operational tensions of its own.

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During the summer months, construction traffic would be competing directly with agricultural vehicles on roads that are, in places, barely wide enough for a single large vehicle. Temporary road closures and passing-place management would create serious logistical disruption. The concentration of heavy industrial activity into the summer season — the Marsh's primary tourism period — would also generate significant air and noise pollution, damaging local wildlife and causing serious disruption for residents and visitors alike, with corresponding harm to the local tourism economy.

**Q3. What is your response to the conflict between restricting construction to the summer season (to protect the drainage system) and the logistical and economic impact of doing so on the road network, on farming, on residents, and on the tourism economy?**

## **5. Battery Storage and Firefighting Water Containment**

The RMAIDB has raised particular concern about the battery storage infrastructure that forms part of large-scale solar farm proposals. In the event of a battery fire, substantial volumes of water and suppressant foam are required for firefighting. The drainage ditch system that characterises Romney Marsh cannot support this demand, and any release of contaminated firefighting water or foam directly into the ditch network would cause serious, potentially irreversible damage to the drainage system and to the protected aquatic and wetland habitats it sustains.

It is my understanding that firefighting water and foam must therefore be contained entirely on site within sealed systems, designed to prevent any release into the land drainage network. I would be grateful for detailed assurance on this point.

**Q4. What on-site containment infrastructure is planned for firefighting water and suppressant foam, and how will you ensure that no contaminated water reaches the Romney Marsh drainage system in the event of a battery fire or other incident?**

## **6. Flooding Risks and the Water Aquifer**

I note that the South Brooks Solar Farm scoping report acknowledges the existence of high-risk flooding points within the ditch system. However, the treatment of impacts on waterbodies beyond one kilometre from the site boundary as negligible is, in my view, not supportable given the interconnected nature of the Romney Marsh drainage network. A failure or blockage at any point in the system can propagate rapidly; and the one-kilometre threshold does not reflect the hydrological reality of the Marsh.

I am also advised that a water aquifer exists within the site boundaries of the proposed development. The risk that construction activity — particularly piling, earthworks, or the installation of underground infrastructure — could compromise the aquifer is a public health concern that must be assessed and scoped into the Environmental Impact Assessment.

**Q5. What measures are being taken to assess and reduce flooding risks beyond the immediate site boundary, including cumulative effects on the wider drainage network?**

**Q6. How will the water aquifer within the site boundary be protected during construction and throughout the operational life of the development?**

## **7. Wildlife and Saline Intrusion**

Romney Marsh supports a range of nationally and internationally significant wildlife, including habitats and species dependent on the precisely managed balance between fresh and salt water in the drainage system. The Marsh is home to species including marsh frogs, great crested newts, water voles, rare wintering and breeding birds, and a variety of aquatic invertebrates found in few other places in England. This ecology is at constant risk from saline intrusion — as was demonstrated starkly by the flooding caused by Storm Goretta in January 2026, which caused significant saltwater contamination of the ditch network.

Large-scale ground disturbance, changes to surface drainage patterns, and the risk of accidental discharge during construction all have the potential to alter the salinity balance in the system and cause harm to these protected habitats and species.

**Q7. How will your development protect the wildlife of Romney Marsh from the risk of saline intrusion, both during construction and in the long term, and what monitoring and remediation commitments are proposed?**

## **8. Scoping in Drainage for All Environmental Impact Assessments**

I note that when Folkestone and Hythe District Council approved the Environmena St Mary's Road Solar Farm in January 2026, it did so subject to conditions that included a specific requirement to assess potential damage to the Marsh's unique drainage system. I consider such a detailed assessment a minimum requirement prior to any decisions on NSIP developments are taken.

I agree with and support the Planning Inspectorate's findings in the Scoping Opinion for the South Brooks Solar Farm (December 2025), which explicitly identified clay pipe drainage systems beneath proposed development parcels as a matter requiring full assessment. The Inspectorate's scoping process also highlighted the importance of collaboration between solar farm proposals on shared infrastructure concerns. Both principles should, in my view, apply to all NSIP solar proposals on the Marsh, not only to South Brooks.

**Q8. Do you agree that drainage must be treated as a priority topic and that all possible impact assessments — including full assessment of the clay pipe field drainage network — should be undertaken as part of your Environmental Impact Assessment?**

**Q9. What plans are in place to co-ordinate construction-phase infrastructure management with other solar farm developments proposed on the Marsh?**

**Q10. What assessments are being undertaken specifically to identify and protect the clay pipe field drainage systems within and adjacent to your development site?**

## **9. Engagement with the Romney Marsh Area Internal Drainage Board**

My office has been informed by the RMAIDB that, in their assessment, the consultation conducted by solar project developers on the Marsh has not been sufficient or meaningful. The RMAIDB is a statutory Risk Management Authority constituted by Act of Parliament, operating under the Land Drainage Act 1991 and the Flood and Water Management Act 2010. It is not an optional consultee. Its professional knowledge of the drainage system is unmatched, and its engagement with developers is essential to safe and compliant project design.

My constituents — farmers, residents, and those whose livelihoods and homes depend on the integrity of the Marsh — want to be part of a meaningful, complex, and rigorous dialogue about the future of their landscape. Consultation must not be a box-ticking exercise. It must lead to full risk identification; and, where necessary, design changes, risk mitigations, and demonstrable improvements to the proposals.

**Q11. What specific steps will you take to improve the quality and depth of your engagement with the RMAIDB, and can you demonstrate that the Board's concerns are being acted upon — not merely noted?**

There is also a resourcing dimension that cannot be ignored. The RMAIDB will be required to dedicate substantial staff time and expertise to reviewing, scrutinising and responding to multiple large NSIP proposals simultaneously, whilst also continuing to deliver its core statutory functions. That is not a cost the Board can reasonably be expected to absorb without appropriate support.

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**Q12. What financial contribution do you propose to make to the RMAIDB to support the additional burden that your development will place on its resources?**

## **Conclusion**

Romney Marsh has survived storms, sea-level change, and centuries of economic and political upheaval because its communities have always understood that the drainage system is not infrastructure that serves the Marsh — it **is** the Marsh. Without it, the land returns to the sea. I do not raise these questions to obstruct the legitimate development of renewable energy. I support the transition to low-carbon generation. But I am clear that development on this particular landscape must be designed, assessed, and delivered with a depth of care and engagement that is commensurate with what is at risk.

I look forward to your detailed and substantive responses to each of the questions above. I intend to share your responses with the RMAIDB, with Folkestone and Hythe District Council, and with my constituents, and I may raise the matters addressed in this letter in Parliament if I consider it appropriate to do so.

I would be grateful for a response within 28 days.

Yours sincerely,

A handwritten signature in black ink that reads "Tony Vaughan". The signature is written in a cursive, flowing style.

**Tony Vaughan KC MP**

Member of Parliament for Folkestone and Hythe