



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

**Natural England's additional comments regarding Landscape and Visual Impacts
including reference to documents included in REP1- 120 regarding acid grassland
proposals.**

For:

The construction and operation of the Sea Link Energy Cable

Planning Inspectorate Reference EN020026

9th December 2025

Key considerations	NE Ref	Comment	Recommendation	RAG rating
Documents Reviewed: <ul style="list-style-type: none"> • [AS-004] 6.3.2.2.A (B) ES Appendix 2.2A Extended Phase 1 Habitat Survey Report (Redacted) • [REP1-120] 9.47 National Landscape Section 85 Duty Technical Note • [AS-057] 7.1 (C) Planning Statement (Clean) 				
Suitability of acid grassland mitigation / enhancement / creation proposals	1	<p><u>Soil suitability</u></p> <p>Natural England can see that the proposed location is on a suitable freely draining slightly acid sandy soils (https://www.landis.org.uk/soilsguide/soilscapes.cfm?ssid=10) for the creation and enhancement of dry acidic grasslands and heath.</p> <p>However, the success of the restoration/enhancement will depend very heavily on the current soil fertility.</p> <p>There is not enough time within the proposed project to have nutrient stripping and provide quality habitat (to offset losses elsewhere). Soil fertility levels must be low (P index 0 or 1) to be able to deliver quality habitat within the timescales of the project. This is particularly important when combined with the risk from localised N inputs from the adjacent land use (open pig farm). Natural England advise that a pH <5.5 and P index 0 or 1 is required, otherwise this will not lead to acid grassland. Natural England note that the pH of the acid grassland enhancement area is 6 (paragraph 5.3.2 of AS-059), and it therefore is unlikely to be suitable.</p> <p>Furthermore, it is not clear how the proposed 6 Ha area site is currently managed. It appears that the land may have been recently cultivated which would affect soil suitability within the proposed</p>	Clarity on which area has been soil tested for acid grassland suitability and the results of those surveys	

		timeframes. It is of key importance that all baseline information is clearly presented to ensure confidence in the efficacy of the proposals.		
	2	<p>The proximity to intensive agriculture</p> <p>There is an outdoor pig farm immediately to the north and upslope (albeit gentle slope) of the proposed location. Given free draining nature of soils there is likely to be at least some movement of nutrients following rainfall from surrounding land use, as well as localised air pollution.</p> <p>Data from the Agricultural Land Environmental Risk Tool (ALERT PublicALERT Environment Agency) mapping tool identifies that the site will receive runoff from the pig farm.</p> <p>Further information is required to demonstrate how this impact pathway will be mitigated.</p> <p>In addition, baseline data regarding the current use of the farmed land is required to understand the fertility status of the proposed location, including:</p> <ul style="list-style-type: none"> • The current management practice for the pig farm. • Information on whether there a rotation between pigs and cows and what the timescales are for this. • How long is the paddock left to grass over between livestock rotations. • The practices for storage of muck/wash down. • Information on nutrient pollution impact pathways between the pig farm area and the proposed 6 Ha area. 	Natural England advise that information to understand the fertility status of the 6ha area is needed, in addition to any further necessary mitigation.	

	3	<p><u>Baseline botanical information</u></p> <p>Natural England note that paragraph 1.4.31 states that the “mitigation area” comprises “3.75 ha of semi-improved acid grassland” which is “species poor”.</p> <p>It is unclear what the quality of individual parcels are and whether they are semi-improved acid grassland or priority habitat. More botanical species information is required on all areas of acid grassland highlighted in the Phase I survey.</p> <p>It is unclear what time of year the botanical survey was conducted. It is crucial that acid grassland is surveyed in late spring/early summer to pick up the more uncommon species in this habitat. By mid to late summer these will no longer be visible.</p>	<p>Natural England advise that the Applicant should provide details on the condition of the acid grassland being temporarily lost, and details on when the botanical survey was undertaken.</p>	
	4	<p><u>Discrepancies with the Priority Habitat Inventory</u></p> <p>Area adjacent to Sandlings SPA and associated area to the east of Leiston Road</p> <p>The information provided suggests that this is lowland acid grassland priority habitat, and this is confirmed for much of the area by the Priority Habitat layer (PHI) on Natural England Maps, but there are discrepancies. Clarification on these discrepancies is needed.</p> <p>Hazelwood Common Area</p> <p>There are discrepancies between the Phase I map and PHI in this area. This also needs clarification. The PHI shows “no main habitat”, but the Applicant’s information suggests is that it is deciduous woodland. This shows that the land has been visited and entered on to the system, but there is no reference to acid grassland</p>	<p>Natural England advise that the Applicant explain the discrepancies between the Priority Habitat Inventory and their Phase I survey to ensure the baseline for acid grassland is accurate.</p>	

	5	<p><u>Timeframes</u></p> <p>The project appears to propose a 10-year commitment to the restoration/enhancement area. If construction disturbance and the creation of new grassland is concurrent, Natural England do not understand how the creation replaces areas disturbed by the project. This is a relatively short timescale, particularly for the creation area, where this is aiming to replace other areas that are disturbed during the project. There does not appear to be any longer-term commitment to maintaining these areas beyond this point, only to restore areas disturbed by the construction phase. 10 years is a minimum to recreate lost habitat, which is not simply about above ground processes. Natural England are therefore unclear what the Applicant's definition of a temporary impact is to acid grassland.</p>	<p>Natural England advise that the Applicant should justify why management is not provided for the lifetime of project and explain what happens to the habitat after 10 years.</p> <p>Natural England advise that the Applicant provides justification on how the proposed creation offers a genuine enhancement to the National Landscape, given that the habitat will be functional at the time its management ceases.</p>	
	6	<p><u>Location of the acid grassland creation/enhancement</u></p> <p>Clarification is required on the specific location proposed for the acid grassland enhancement/creation. The area proposed is much larger than 6ha.</p> <p>If the flexibility is to allow for at least 6 ha acid grassland but the whole area will be restored to low fertility and pH land use (accepting that some areas may be more like neutral grassland) this may be acceptable.</p> <p>However, if the flexibility is to allow the landowner to continue with more intensive agricultural practices on parts of the restoration/enhancement site, this would compromise the likely success of the restoration.</p>	<p>Natural England advise that the Applicant explains why there is flexibility in the location of acid grassland creation/enhancement.</p>	

	7	<p><u>Purpose of the acid grassland proposals</u></p> <p>REP1-120 explains that the additional acid grassland provision of 6ha is to “<i>provide enhancement ecologically and within the context of the Suffolk Coast and Heaths AONB</i>”. Table 1 distinguishes the “Acid Grassland Areas Affected and Enhancement”, in hectares.</p> <p>Natural England understand the proposals are being put forward by the Applicant to satisfy S245 LURA, and to provide mitigation for the temporary loss of Functionally Linked Land.</p> <p>The multiple stacked purposes of the 6ha area need to be clearly differentiated. For instance, its purpose as mitigation for loss of FLL, and to satisfy the Applicants duties under s245 LURA</p>	<p>Natural England advise that clarity is provided on the multiple stacked purposes of the acid grassland proposals (6ha) for the project Natural England advise that clarity is provided on whether this enhancement area is also mitigation, and whether acid grassland is being created or restored here, or both.</p> <p>Natural England advise that clarity is provided on what mitigation is being provided for the 7.61ha of acid grassland being temporarily affected.</p> <p>Natural England advise that the Applicant provides definitions for acid grassland mitigation / creation / enhancement / restoration / reinstatement.</p>	
	8	<p><u>Applicants’ acid grassland proposals to meet S245 LURA duty</u></p> <p>The acid grassland note refers to the Planning Statement’s justification for how the project meets s245 LURA. This is</p>	<p>Natural England advise that the Applicant clarifies which special qualities are</p>	

	<p>summarised as “<i>This includes acid grassland being a key and important habitat in the AONB so enhancement contributing towards local distinctiveness and that land management should provide for nature recovery which the acid grassland enhancement would contribute towards.</i>”</p> <p>Para 7.3.22 of the Planning Statement provides National Grid’s rationale for 6ha of acid grassland provision.</p> <p>Natural England advise that more detail needs providing to explain how the creation of “a comparatively wilder and more tranquil land use type” (paragraph 7.3.22 Planning Statement) justifies the proposed enhancement. This is because 6ha is a very small land parcel, and if established as acid grassland it would provide less habitat than that being lost, which has short-term management.</p> <p>The planning statement outlines that some of the landscape is noted to be in a poor condition due to agricultural land use, which the replacement of agricultural land with acid grassland would assist in improving. It is not clear which special quality this replacement relates to, or whether the proposed land for enhancement is currently in poor condition.</p>	<p>being enhanced by the proposals.</p> <p>Natural England advise that the Applicant clarifies why an area of 6ha in size been determined as being appropriate, and how the proposed area was selected. Natural England would like to understand how the proposals are proportionate to the significance of the habitat and complexity of restoration.</p> <p>Natural England advise that the Applicant clarifies how the enhancement would “assist in enlarging the area of the unique character of the AONB”? (paragraph 7.3.22 Planning Statement) in terms of the statutory purposes of the National Landscape.</p> <p>Natural England advise that the Applicant explains how the proposals to enhance acid grassland align with</p>	
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			the national landscape management plan.	
Document Reviewed: <ul style="list-style-type: none"> [AS-007] Habitats Regulations Assessment 				
Assessment of impacts to SPA nightjar and woodlark, which use acid grassland within and adjacent to the SPA.	9	<u>Overarching comment on HRA</u> Impacts to acid grassland, a key supporting habitat within the SPA and FLL are not clearly assessed within the HRA. <u>This advice replaces comment A14 within Natural England’s relevant and written representations.</u>	N/A	
	10	The Applicants assessment (7.2.9) states that although breeding birds have not been recorded the compound field is “very likely” to be functionally linked land. Natural England agrees with this assessment.	N/A	
	11	Natural regeneration is proposed to restore acid grassland after disturbance within the construction phase (Paragraph 4.2.4 of the Outline Landscape and Ecological Management Plan). Natural England support this proposal but advise that it is essential to understand soil fertility and pH for successful restoration.	See Point 1 (soil suitability section) for NE further advice.	
	12	One function of the restoration and enhancement (acid grassland) area appears to focus on providing habitat for bird species particularly Woodlark and Skylark, also invertebrates. It is not clear if the aim is to create priority habitat, because if the focus is habitat for bird species, then the grassland species composition may not be as crucial as the habitat structure.	Does the Applicant propose to create more Priority Habitat?	

	13	<p><u>The nature, location, quantity, habitat type, timing and duration of possible impacts to acid grassland are not clearly stated with inconsistent data between documents.</u></p> <p>The quantity and location of acid grassland affected differs between documents.</p> <p>For example:</p> <ul style="list-style-type: none"> the acid grassland note provided by the Applicant states that 7.61ha of acid grassland will be temporarily affected Paragraph 7.2.5 (HRA) states that a further area (totalling approximately 8 ha) of acid grassland north of the golf course would also be temporarily removed while it is traversed by the cable trench. ES Chapter 2 (Document: 6.2.2.2) paragraph 2.9.50 states an area of approximately 9ha of priority habitat acid grassland north of the golf course and east of the B1122 would be temporarily removed due to the trenchless compound Paragraph 2.9.28 (HRA) states approximately 2.5 ha of acid grassland would be temporarily lost adjacent to Sandlings SPA due to the trenchless construction compound (S10) and associated section of cable trench east of Leiston Road and in addition (2.2.29) a further 8km loss north of the golf club. <p>In addition to the uncertainty of the nature and location of impacts, The HRA currently lacks detail on the in- combination impacts of the proposal with the approved application for the extension of Aldringham Golf Course The extended area lies within the red line boundary of the Sea Link project, The HRA should include the plans</p>	<p>NE advises that:</p> <ul style="list-style-type: none"> The nature, location, quantity, habitat type, timing and duration of possible impacts to acid grassland are clarified and clearly stated in one place. These details should be clarified within the oLEMP. Clarification is needed on why the further 8ha of temporarily affected acid grassland is not included in the total amount of acid grassland temporarily affected by the project. Clarity is required regarding why the acid grassland is not being avoided by HDD as per requirements of the 	
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	<p>for the golf course and implications for acid grassland reinstatement along this section of the route.</p> <p>There is a lack of clarity on project timescales.</p> <p>Paragraph 8.2.6 of HRA states that “<i>For the temporary duration of works this will be offset by leaving an area of arable land on sandy soils fallow and/or seeding it as acid grassland to be maintained for 30 years, which will have a long-term benefit.</i>” All other references appear to refer to 10 years. Natural England advise that 30 years is a much more realistic timescale to create priority habitat.</p> <p>The report concludes a temporary impact but does not take into consideration the possibility that acid grassland may fail to reinstate and therefore become a long-term impact. Para 7.2.5 states that the loss of foraging ground will last for a single nesting season, however contingency is required should habitats fail to reinstate during the expected timeframes.</p> <p>Clarification is required on the locations of acid grassland that are considered to be Functionally Linked Land</p> <p>It is not clear from the evidence presented if the area of land to the north of the golf course is Functionally Linked to the Sandlings SPA.</p> <p>The 6ha area is also being proposed as mitigation for loss of FLL for Sandlings SPA and to conclude no AEOI. The report states (7.2.9) that the acid grassland reinstatement area will offset impact to foraging areas. However as above this depends on successful reinstatement and evidence that both species (nightjar and woodlark) would benefit. Furthermore, should the area prove appropriate it the establishment period requires careful consideration. It could take just as long to create the 6ha area as reinstate the temporarily lost acid grassland habitat.</p>	<p>mitigation hierarchy.</p> <ul style="list-style-type: none"> • Clarification is needed on which acid grassland parcels are functionally linked to the Sandlings SPA. 	
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		Clarification is required on the intended function of the 6ha area and how it would benefit both woodlark and nightjar in order to clarify the conclusions of the HRA.		
	14	<p><u>Impacts from the construction compound (Suffolk)</u></p> <p>Natural England presume that the compound will be lit. Natural England advise that the impact of lighting from the construction compound on SPA birds has not been assessed.</p>	Assessment of the impact of light spilling into the SPA and surrounding areas used by nightjars and woodlark is required as this would extend into the breeding season whilst the compounds are in operation	
	15	<p><u>Noise assessment</u></p> <p>Natural England advise that the noise contour map included in Appendix E Figure 3 requires additional clarification. This is because it appears to show noise as a uniform contour throughout the working corridor regardless of proposed activity. It is unclear how the impact of HDD for example or construction compounds has been considered in this assessment as it is likely that noise impacts would vary between these activities and this does not appear to be illustrated on the map presented.</p>		