



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

Sea Link Energy Cable

**Appendix A3 to the Natural England Deadline 3 Submission  
Natural England's comments on Suffolk Onshore Ecology matters**

For:

The construction and operation of Sea Link Energy Cable

Planning Inspectorate Reference EN020026

---

9<sup>th</sup> January 2026

## **Appendix A3 – Natural England’s Advice on documentation related to Onshore Ecology in Suffolk**

In formulating these comments, the following documents from pre-examination to Deadline 1 have been considered in relation to the impacts of the Sea Link Energy Cable on Onshore Ecology matters in Suffolk (advice in relation to documents which have not yet been reviewed, will be provided at the next appropriate deadline):

- [AS-028] 6.4.2.2.A (B) Phase 1 Habitat Survey Report (including Badgers and Important Hedgerows) - Applicants response to Section 51 Advice issued on 23 April 2025 - Accepted at the discretion of the Examining Authority
- [AS-056] 6.12 (B) Biodiversity Net Gain Feasibility Report (Tracked)
- [AS-060] 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Tracked)
- [AS-110] Additional Submission accepted at the discretion of the Examining Authority - Applicant's response to the ExA's s89(3) letter of 5 September 2025 - 6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise & Vibration (Tracked Changes)
- [AS-130] Additional Submission accepted at the discretion of the Examining Authority - Applicant's response to the ExA's s89(3) letter of 5 September 2025 - 7.5.6.1 (B) Air Quality Management Plan - Suffolk (Tracked Changes)
- [AS-132] Additional Submission accepted at the discretion of the Examining Authority - Applicant's response to the ExA's s89(3) letter of 5 September 2025 - 7.5.8.1 (B) Outline Construction Noise and Vibration Management Plan - Suffolk (Tracked Changes)
- [CR1a-001] Applicant's response to the ExA's Rule 9 letter of 25 September 2025
- [CR1a-002] Supporting document to the change request notification – Cover Letter
- [CR1a-003] Supporting document to the change request notification – Change Application Consultation Document
- [CR1a-004] Supporting document to the change request notification – DCO change notification letters
- [CR1a-005] Supporting document to the change request notification – Covering Letter Cat 3 Oct 2025
- [CR1a-006] Supporting document to the change request notification – Change Application Consultation Figures
- [CR1a-007] Supporting document to the change request notification – Draft Land Rights Plans

- [PDA-020] 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils (Tracked)
- [PDA-026] 6.3.2.2.B (B) Appendix 2.2.B Suffolk Wintering Bird Report (Tracked)
- [PDA-028] 6.3.2.2.C (B) Appendix 2.2.C Suffolk Breeding Bird Report (Tracked)
- [PDA-037] 9.20.1 Landfall Sediment Modelling Report Aldeburgh
- [REP1-048] 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Tracked Changes)
- [REP1-072] 6.6 (C) Habitats Regulations Assessment Report (Tracked Changes)
- [REP1- 103] 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Tracked Changes)

## **1. Introduction**

Please see below the detailed comments from Natural England in relation to the Suffolk onshore documents. Please refer to Appendix B3, Annex 1 of Natural England's Deadline 3 submission for Natural England's standard advice for air quality impacts in Nationally Significant Infrastructure Projects (NSIPs).

## 2. Detailed Comments

NE Ref	Section/Para	Key Concern and/or Update	Natural England's Advice to Resolve Issue
<b>Documents reviewed:</b>			
<p>[CR1a-001] Applicant's response to the ExA's Rule 9 letter of 25 September 2025</p> <p>[CR1a-002] Supporting document to the change request notification – Cover Letter</p> <p>[CR1a-003] Supporting document to the change request notification – Change Application Consultation Document</p> <p>[CR1a-004] Supporting document to the change request notification – DCO change notification letters</p> <p>[CR1a-005] Supporting document to the change request notification – Covering Letter Cat 3 Oct 2025</p> <p>[CR1a-006] Supporting document to the change request notification – Change Application Consultation Figures</p> <p>[CR1a-007] Supporting document to the change request notification – Draft Land Rights Plans</p>			
1	N/A	<p><u>Proposed changes to work plans at Suffolk landfall (changes 2-5)</u></p> <p>Natural England advises, having reviewed the October 2025 Change Application Consultation Document, that we have no further advice to provide for changes 2-5 relating to Suffolk. Natural England is content that there are no further environmental concerns arising from these proposed changes.</p>	N/A
<b>Document reviewed:</b> [PDA-037] 9.20.1 Landfall Sediment Modelling Report Aldeburgh			
2	N/A	<p>We note that this report draws from the 2010 Shoreline Management Plan (SMP7). The biggest influences on coastal processes here are the nearshore banks and how they modify wave and tidal energy and influence the drift of sediment. However, there is limited discussion of the Aldeburgh Napes in this report, with more evidence drawn from the influence of the Aldeburgh Ridge. However, the reason for this is not explained.</p> <p>We note that if the cable route remains as outlined it will not go through the Aldeburgh Ridge or Napes and so should not change their functioning directly. However, given the complex nature of this area and how the movement of sediment within the system is influenced by different events, any potential impacts of cable</p>	<p>Natural England advises that an impact assessment is conducted in relation to Coralline Crag and provided into Examination. As well further consideration of the Aldeburgh Napes and Ridge.</p>

NE Ref	Section/Para	Key Concern and/or Update	Natural England's Advice to Resolve Issue
		<p>protection placed in the area should be assessed, particularly where currently the bedform is mobile in nature.</p> <p>Figure 1 Landfall Concept Drawing shows that all three HDD exit points will drill through Coralline Crag. No assessment of potential impacts to this geological feature is provided.</p>	
<b>Document reviewed:</b> [REP1-048] 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Tracked Changes)			
3	Table 2.5 2.9.16 2.9.8	<p>In Table 2.5 and paragraph 2.9.16 we note that the air quality dust impact zone has been increased to 250m following our advice.</p> <p>In section 2.9.8 we welcome that further details have been provided to explain how equipment would be retrieved should it become stuck during Horizontal Directional drilling (HDD) under Leiston-Aldeburgh Site of Special Scientific Interest (SSSI). However, we note paragraph 2.9.8 states "<i>In the extremely unlikely event that a drilling string cannot be recovered it will be left in situ, having no ecological implications given the depth below ground</i>". We advise that should a drilling string be unable to be recovered, an assessment of the potential impacts, including relating to soils and groundwater, should be undertaken to inform the decision of whether the equipment should be left in situ.</p>	<p>To fully resolve Point 11 we advise that the plan for dealing with HDD equipment if it gets stuck beneath Leiston-Aldeburgh SSSI should include an assessment of potential impacts prior to any decision being taken to leave equipment in situ. We advise an outline HDD management plan is provided and updated through examination.</p> <p>We also advise that a condition should secure submission and agreement of the final method statement prior to construction.</p>
4	2.9.42	In paragraph 2.9.42 we welcome that the time woodlarks are non-breeding has been changed from 'September to February inclusive' to 'September to January inclusive' in line with our advice.	Point 8 of the risk and issue log is resolved.
5	2.9.44	In section 2.9.44 the term residual effect has been changed to 'loop' effect.	Please can the Applicant provide further clarity on what is meant by

NE Ref	Section/Para	Key Concern and/or Update	Natural England's Advice to Resolve Issue
			the loop effect as without that we are unable to advice further.
6	2.9.50	Paragraph 2.9.50 states that 7.6ha of priority habitat acid grassland would be temporarily removed during construction (this has been amended from 9ha in this version of the document). However, in a recent meeting the Applicant explained that they believed the acid grassland north of the golf course to be not priority habitat, so we question whether this figure needs to be further revised.	Natural England advises that further consideration of the scale of the impacts to acid grassland is required.
<b>Document reviewed:</b> [REP1-072] 6.6 (C) Habitats Regulations Assessment Report (Tracked Changes)			
7	Ex1.5.3 and 7.2.17	We note that in sections Ex1.5.3 and 7.2.17 the references to the woodlark breeding season have been changed from 'March-August' to 'February-August' inclusive, in line with our advice.	Point 13 resolved.
<b>Document reviewed:</b> [REP1- 103] 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Tracked Changes)			
8	N/A	<p>Measure B59 includes the applicant to prepare an HDD landfall method statement and drilling fluid management plan, and to undertake HDD landfall hydrofracture modelling, with both to be shared with NE. We advise that an outline plan should be submitted into examination and that the final management plan should be agreed in consultation with relevant SNCB prior to construction. We note also in this measure that NE is to be notified of any change to landfall HDD depth or any changes to the location of landfall exit pit.</p> <p>We welcome the inclusion of measure B60, which is in line with our advice. We advise that a condition should be secured to allow no vehicle access to shingle habitats.</p> <p>We welcome measure B62, pre-construction botanical surveys to support monitoring of impacts relating to HDD.</p>	<p>To resolve point 12, and outline HDD methodology should be submitted into examination and a condition should be secured for the final HDD management plan to be agreed in consultation with relevant SNCB prior to construction.</p> <p>Resolves point 4.</p> <p>To clarify Point 7, dewatering impacts should be assessed if additional ground investigation boreholes are needed or if the</p>

NE Ref	Section/Para	Key Concern and/or Update	Natural England's Advice to Resolve Issue
		<p>We note measure B63 to inform NE of any proposals to undertake groundwater investigation surveys on or adjacent to shingle habitats. To clarify our advice in A7, the GI surveys we were referring to were ground investigation surveys, such as were conducted to inform HDD feasibility. If the results of any future such surveys meant that a change in the depth of HDD drilling was needed, then potential dewatering impacts on sensitive shingle habitats would need to be assessed.</p>	<p>additional ground investigation surveys determine that a change in the depth of drilling is needed.</p>