



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

Sea Link Energy Cable

**Appendix H3 to the Natural England Deadline 3 Submission**

**Natural England's Comments on Suffolk Landscape Visual Impact Assessment (LVIA)**

For:

The construction and operation of Sea Link Energy Cable

Planning Inspectorate Reference EN020026

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9<sup>th</sup> January 2026

## **Appendix H3 – Natural England’s Advice on documentation related to Suffolk Landscape Visual Impact Assessment (LVIA)**

In formulating these comments, the following documents have been considered in relation to the impacts of the Sea Link Energy Cable on Suffolk LVIA:

- [AS-007] 6.6 (B) Habitats Regulations Assessment Report
- [AS-062] 9.6.1 Appendix A Indicative cumulative visualisations of the National Grid and Scottish Power Renewables substations near Friston
- [AS-063] 9.6.2 Appendix B Consented SPR Outline Landscape Mitigation overlain with the Sea Link Outline Landscape Mitigation for NGET Substation
- [AS-064] 9.6.3 Appendix C Visualisations showing the indicative location of the Lionlink converter station alongside the Sea Link converter station
- [AS-102] Additional Submission accepted at the discretion of the Examining Authority – Applicant’s response to the ExA’s s89(3) letter 8 July 2025 & 5 August 2025 – 9.11.1 Additional visualisation request from the AONB
- [AS-103] Additional Submission accepted at the discretion of the Examining Authority – Applicant’s response to the ExA’s s89(3) letter 8 July 2025 & 5 August 2025 – 9.11.2 Additional visualisation request
- [REP1-120] 9.47 National Landscape Section 85 Duty Technical Note ()
- [REP1-121] 9.48 River Fromus Visualisations (superseded)
- [REP1-296] 9.14 Suffolk and Kent Illustrative Visualisations Part 1 of 2
- [REP1-297] 9.14 Suffolk and Kent Illustrative Visualisations Part 2 of 2
- [REP1-298] 9.48 River Fromus Visualisations Part 1 of 3
- [REP1-299] 9.48 River Fromus Visualisations Part 2 of 3
- [REP1-300] 9.48 River Fromus Visualisations Part 3 of 3

### **1. Introduction**

Please see below the comments from Natural England in relation to the Suffolk LVIA documents.

**Table 1: Natural England's Summary of advice on: Suffolk LVIA Onshore**

<b>Document reviewed</b>	<b>Natural England's Advice</b>
[REP1-120] 9.47 National Landscape Section 85 Duty Technical Note	<p>Natural England has additional detailed comments on the content of this document (Please see Table 2) These should also be considered with our recently submitted Annex titled 'Landscape and Visual Impacts including reference to documents included in REP1-120 regarding acid grassland proposals' comments which were provided at Deadline 2. Please note for ease of reading our comments have concentrated on the conclusions provided in the document and what is needed to evidence these.</p> <p>We continue to advise that additional supporting information regarding the Landscape and Visual Impact assessment remains outstanding. This information relates to key evidence and assessment material, for example baseline data, clarity on LVIA assessment methodology, evidence of how the project has followed the mitigation hierarchy and the function of the 6Ha enhancement area.</p>
[AS-062] 9.6.1 Appendix A Indicative cumulative visualisations of the National Grid and Scottish Power Renewables substations near Friston	Noted
[AS-063] 9.6.2 Appendix B Consented SPR Outline Landscape Mitigation overlain with the Sea Link Outline Landscape Mitigation for NGET Substation	Noted
[AS-064] 9.6.3 Appendix C Visualisations showing the indicative location of the Lionlink converter station alongside the Sea Link converter station	Noted
[AS-102] Additional Submission accepted at the discretion of the Examining Authority – Applicant's response to the ExA's s89(3) letter 8 July 2025 & 5 August 2025 – 9.11.1 Additional visualisation request from the AONB	Noted
[AS-103] Additional Submission accepted at the discretion of the Examining Authority – Applicant's response to the ExA's s89(3) letter 8 July 2025 & 5 August 2025 – 9.11.2 Additional visualisation request from along the River Stour	Noted
[REP1-109] 9.14 Suffolk and Kent Illustrative Visualisations	Noted
[REP1-121] 9.48 River Fromus Visualisations	Noted

Document reviewed	Natural England's Advice
[REP1-296] 9.14 Suffolk and Kent Illustrative Visualisations Part 1 of 2	Noted
[REP1-297] 9.14 Suffolk and Kent Illustrative Visualisations Part 2 of 2	Noted
[REP1-298] 9.48 River Fromus Visualisations Part 1 of 3	Noted
[REP1-299] 9.48 River Fromus Visualisations Part 2 of 3	Noted
[REP1-300] 9.48 River Fromus Visualisations Part 3 of 3	Noted

## 2. Detailed comments

Table 2: Natural England's Detailed Advice On: Suffolk LVIA

Document reviewed: [REP1-120] 9.47 National Landscape Section 85 Duty Technical Note				
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue	RAG
1	EX1.03	<p>The total area of land within the Area of Outstanding Natural Beauty (AONB) which would be temporarily affected during construction would be 7.61 ha of which 91% is comprised of acid grassland.</p> <p>A proportion of this area (4.05 ha) has been disturbed and reprofiled due to the expansion of the adjacent golf course</p>	<p>It is not clear if the 4.05 ha of land within the extended golf club will be able to be reinstated. Will this area remain in operation as a golf course following reinstatement?</p> <p>It is not clear how the golf course proposals have been considered in combination with the proposal.</p> <p>Natural England Advises further evidence to be provided on address the above points .</p>	
2	Ex1.0.4	<p>Natural England notes that due to the two-year lag-time following reinstatement before functional acid grassland is restored, and possibly a slightly longer time-period before all the grassland matures, a parcel of land has been identified in the Order Limits in which a 6 ha area of acid grassland would be enhanced and subsequently maintained for a 10 year period. This would provide a net enhancement of at least 6 ha.</p>	<p>Natural England advises that further consideration of the suitability of the enhancement area and the management measures required to achieve success and over what duration given the concerns we raise in the following point regarding the duration of the impact. Ideally, a standalone enhancement</p>	

Document reviewed: [REP1-120] 9.47 National Landscape Section 85 Duty Technical Note				
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue	RAG
		<p>Whilst this is welcomed it remains unclear to Natural England what habitats are present in the identified 6Ha and how these will be enhanced. The area identified appears to contain deciduous woodland. How much acid grassland will be enhanced in this area?</p> <p>It remains unclear how the Applicant has considered impact pathways from the pig farm on the potential for reinstatement of the acid grassland. Please see our comments provided in Appendix titled 'Landscape and Visual Impacts including reference to documents included in REP1-120 regarding acid grassland proposals' at Deadline 2.</p> <p>It is unclear what the baseline pH is for this area and what impact inputs from the recently cultivated area adjacent to the 6Ha parcel may have on successful enhancements.</p> <p>We advise that an explanation of how 10 years is a sufficient length of time in which to manage this area to a sufficient standard to compensate for direct impacts to acid grassland in the Protected Landscape.</p> <p>We query why this area is not maintained for the lifetime of the project.</p>	<p>area implementation and management plan would be submitted into examination.</p>	

Document reviewed: [REP1-120] 9.47 National Landscape Section 85 Duty Technical Note				
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue	RAG
		<p>We advise there is insufficient evidence presented to support the conclusions that this area would be fit for purpose as compensation for acid grassland impacts.</p> <p>We advise that an explanation of how 10 years is a sufficient length of time in which to manage this area to a sufficient standard to compensate for direct impacts to acid grassland in the Protected Landscape.</p> <p>We query why this area is not maintained for the lifetime of the project.</p> <p>We advise there is insufficient evidence presented to support the conclusions that this area would be fit for purpose as compensation for acid grassland impacts.</p>		
3	Ex1.0.4	<p>Natural England highlights that additional information is required regarding the temporal (2 years) nature of the impact and how this has been substantiated.</p> <p>The LVIA assumes that the impact of habitat removal here is temporary (2 years) We advise that the complexity of this habitat some of which is priority habitat and added risks of reinstatement, including time to reach functionality, (which would affect the temporal nature of the impact in LVIA) should be acknowledged and assessed in the LVIA.</p> <p>It remains unclear which areas will be impacted and reinstated. Natural England queries if the area of the golf course disturbed</p>	<p>Natural England advises that further consideration of acid grassland recovery is required in order to support the conclusions on the duration of the impact</p>	

Document reviewed: [REP1-120] 9.47 National Landscape Section 85 Duty Technical Note				
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue	RAG
		and reprofiled (4.05 ha) impact any reinstatement potential in this area? The golf course proposals are not clearly included as in-combination assessment in the project.		
4	Ex1.0.5 and Table 3.41	<p>The proposed acid grassland enhancement within the designated landscape is considered to target the Natural Beauty and Special Qualities indicators of the Suffolk &amp; Essex Coast &amp; Heaths AONB</p> <p>We continue to advise that in accordance with the mitigation hierarchy and the importance of this habitat landscape in both landscape, and ecological terms, the project should avoid sensitive habitats and employ trenchless techniques in this area.</p> <p>Document: 6.3.2.1.C highlights that acid grassland is an important defining element of natural beauty for the Suffolk &amp; Essex Coast &amp; Heaths National Landscape.</p> <p>It is not clear which Special Qualities and Indicators will be targeted by the acid grassland enhancement. Table 3.2 does not contain clear evidence to substantiate this. (Please see further comments below regarding table 3.41)</p> <p>The current baseline of the 6Ha enhancement area appears to include priority deciduous woodland habitat and biodiversity interest, it is not clear how the enhancement proposals may themselves impact on an area of existing value for biodiversity.</p>	<p>Natural England advises that further consideration of the suitability of the enhancement area and the management measures required to achieve success and over what duration given the concerns we raise in the following point regarding the duration of the impact. Ideally, a standalone enhancement area implementation and management plan would be submitted into examination.</p>	

Document reviewed: [REP1-120] 9.47 National Landscape Section 85 Duty Technical Note				
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue	RAG
		<p>The baseline, scope for enhancement and target condition are not detailed in the assessment material.</p> <p>For example, plates depicting target habitats in the Document 6.3.2.2.A Part 2 Suffolk Chapter 2 Appendix 2.2.A do not include this area.</p>		
5	Ex1.0.5 (cont'd)	<p>Natural England notes that the proposed acid grassland enhancement within the AONB has multifunctional purposes to further the purpose of the AONB, notably including landscape, ecology and Biodiversity Net Gain.</p> <p>As above we consider avoidance of impact to be key here.</p> <p>The report clarifies that the 6 Ha proposed enhancement area is less than the area impacted by the scheme.</p> <p>It is not clear how this area achieves multifunctional purposes. This appears to be conflated. Clarification is therefore required regarding the targeted function of the 6ha land.</p> <p>It appears that this 6Ha area would form part of compensation for direct impacts to acid grassland. However it is not connected to the area of impact and appears to already contain habitats of biodiversity interest.</p> <p>Furthermore, mitigation, compensation and enhancement need to be considered with Biodiversity Net Gain considered after this.</p>	<p>We advise that the assessment of impact must have clear auditing of baseline (including the 6Ha area), measures to avoid impact (in line with the mitigation hierarchy), mitigation to reduce impact and where impacts are unavoidable, compensation</p> <p>And this should be used to determine the targeted function of the 6ha of land ensuring that it is fit for purpose.</p>	

Document reviewed: [REP1-120] 9.47 National Landscape Section 85 Duty Technical Note				
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue	RAG
		<p>We reiterate that the impact assessment does not appear to consider severance of acid grassland habitat.</p> <p>It is of key importance not to conflate Biodiversity Net Gain (BNG) with the requirements of the mitigation hierarchy. Each require a clear audit trail. Furthermore, BNG is required to be secured for 30 years, and this land is only secured for 10 years. Therefore, it would not qualify for BNG.</p> <p>BNG is required to be secured for 30 years, and this land is only secured for 10 years. Therefore, it would not qualify for BNG.</p>		
6	Ex1.0.6	<p>We note that the Applicant has determined that because there are no likely significant effects on the AONB from the Suffolk Onshore Scheme (alone), any significant inter-project cumulative effects are only likely for a short and temporary period, and there would be an overall increase in the extent and quality of acid grassland habitat within the AONB due to the enhancement proposed and secured, the s85 duty to seek to further the purposes of the AONB has been complied with.</p> <p>From the information provided we do not concur that the 6Ha proposals seek to further the purposes of the AONB.</p> <p>We continue to advise that there is insufficient evidence used to justify that the impacts to acid grassland are small scale. We await additional information from the applicant to demonstrate this.</p>	<p>As detailed in previous points above we advise that multifunctional purposes should be clearly evidenced/audited from the assessment material provided in support of the application.</p> <p>We advise that the mitigation hierarchy applies to each stage of the assessment of impact and that clear justification of why <b>avoidance</b> of impact is not achievable, should be provided.</p> <p>The LVIA Assessment requires additional detail and evidence regarding choice of location, detail of baseline, management proposed and certainty of success.</p> <p>Furthermore, should the short (10 year) proposals for these areas provide an increase</p>	

Document reviewed: [REP1-120] 9.47 National Landscape Section 85 Duty Technical Note				
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue	RAG
		<p>We continue to advise that it is not clear how the special qualities and indicators of the Suffolk and Essex Coast and Heaths National Landscape have been assessed and how a conclusion of no likely significant effects has been substantiated.</p> <p>Natural England continues to advise that we do not agree that impacts in relation to small geographical extents can moderate impact to statutory purposes</p> <p>We advise that all the above limits the opportunities of the enhancement area. Therefore, it is not clear how the 6Ha area would be considered as seeking to further the purposes of the National Landscape.</p>	<p>in acid grassland this would be for a temporary period and ongoing plans for this area post 10 years should be provided.</p>	
7	1.2.3	<p>The Planning Statement (Application Document 7.1 Planning Statement [AS-057]) provided an assessment on each of the Special Qualities Indicators. However, Natural England notes that the baseline for the Special Qualities from the 2016 published document was not presented within this assessment. Those points relevant to landscape and visual matters were included in the landscape baseline appendix (Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096]).</p> <p>We advise that the referenced Planning Statement does not provide a detailed appraisal of the impact of the scheme on the special qualities of the Protected Landscape.</p>	<p>Natural England advises that the planning statement and relevant documents are updated accordingly.</p>	

Document reviewed: [REP1-120] 9.47 National Landscape Section 85 Duty Technical Note				
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue	RAG
		<p>In addition, the referenced Planning Statement refers back to Document: 6.3.2.1.C Part 2 Suffolk Chapter 1 Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk for a full assessment. We continue to advise that Document 6.3.2.1.C does not appear to include a full assessment of impacts on special qualities as set out in the Management Plan.</p> <p>This is because the table does not clearly include the full suite of Special Quality indicators and accompanying narrative/evidence informing assessment parameters and evidence to substantiate conclusions made.</p> <p>As previously advised the detailed/comprehensive assessment of the impact of the project on what makes the receiving landscape special is not clearly presented.</p> <p>The assessment relies on temporality of impact which we continue to advise requires substantiation.</p> <p>We continue to advise that the conclusion that that the effect is localised/small scale again is not clearly substantiated and is not applicable to LVIA assessment as the impact on place is key.</p> <p>This evidence is crucial to the assessment because it has been used to moderate the Applicants conclusion on the magnitude of effect on special qualities.</p>		

Document reviewed: [REP1-120] 9.47 National Landscape Section 85 Duty Technical Note				
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue	RAG
		Natural England does not agree that impacts in relation to small geographical extents can moderate impact to statutory purposes.		
8	2.1.1	<p>Natural England notes that the AONB and its setting were considered in the early stages of the routeing and siting for the Suffolk Onshore Scheme.</p> <p>However, it is not clear how the impact of the project on the setting of the Protected Landscape has been assessed.</p>	<p>Natural England advises that further detail is included on the impact of the scheme in its entirety, including impact of trenchless crossings into the setting. This is not limited to the location of the converter station/landing site.</p>	
9	3.4.1	<p>Table 3.2 and Table 3.3 set out how the acid grassland enhancement works respond to the Natural Beauty and Special Qualities Indicators along with the effects at each stage of the Suffolk Onshore Scheme. For the Suffolk Onshore Scheme alone, there are no significant adverse effects on the Natural Beauty and Special Qualities of the AONB.</p>	<p>As above we advise that further narrative and evidence regarding special qualities is required in order to substantiate the conclusions in this table, and that the avoidance of impact to acid grassland via HDD should fully assessed.</p> <p>Furthermore, the project is relying on successful establishment of this habitat . Therefore, the assessment should consider the risks of establishment with the ongoing farming/ agricultural practices directly adjacent to the scheme and lack of information on baseline data.</p> <p>Furthermore, we advise that the land is consideration is given to the land being secured for beyond 10 years.</p>	