



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

Appendix H4 to the Natural England Deadline 4 Submission

Natural England's Additional Comments on the Suffolk LVIA

For:

The construction and operation of the Sea Link Energy Cable.

Planning Inspectorate Reference EN020026

10th February 2026

Appendix H4- Natural England's advice on documentation relating to Suffolk LVIA.

In formulating these comments, the following documents have been considered in relation to Suffolk's Landscape and Visual impact of the Sea Link Energy Cable on Suffolk:

- [REP1-120] 9.47 National Landscape Section 85 Duty Technical Note.
- [REP3-069] 9.73 Applicant's response to First Written Questions
- [REP3-070] 9.73.1: Applicant's Responses to First Written Questions – Appendices
- [CR1-046] 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk (Version 2, change request) (Tracked changes)

There were no comments to be made in relation to Suffolk's Landscape and Visual Impact of Sea Link Energy Cable for the following documents:

- [REP3-002] 2.3 (D) Land Plans Part 1 of 2
- [REP3-004] 2.4 (C) Special Category and Crown Land Plans Part 1 of 2
- [REP3-029] 6.6 (E) Habitats Regulations Assessment Report (Tracked)
- [REP3-075] 9.82 operational Noise contour Plan for Saxmundham Converter Station
- [REP3-077] 9.83 Outline Code of Construction Practice (Tracked)

1. Summary of Natural England's position regarding Landscape and Visual impacts to the Suffolk and Essex Coast National Landscape

Given that impacts to the Suffolk and Essex Coast National Landscape remain a key ongoing issue for this examination, Natural England hopes it will be helpful to the Examining Authority to provide the following summary of key outstanding Landscape and Visual matters. We consider that the following should be addressed via further clarification, evidence and audit trail of decision making to substantiate assessment conclusions.

2. 6 Hectare Restoration Area

The following is included as a key issue as the project is relying on the success of restored acid grassland for direct impacts to acid grassland habitats within the Protected Landscape.

Natural England continue to advise that additional evidence is required regarding the baseline habitat type of this area (a portion of which appears to be deciduous woodland priority habitat). Information regarding soil pH and influencing factors such as the adjacent agricultural land use have not been evidenced.

It is not clear how the 10-year management plan would be sufficient to provide the stated gains, either on ecological grounds or Landscape and Visual. This is a clear risk to the efficacy of compensation. Furthermore, the pre-commencement management of this area does not appear to be substantiated in the LEMP or Plate 3.2 within Document 9.47 [REP1-120].

Clarification is required of the term "*multifunctional enhancements*" for this area. This should be evidenced by a clear audit trail of impact, mitigation and as a last resort compensation

with quantum provided for each impact. This is a requirement of the mitigation hierarchy. Enhancement is provided in addition to mitigation and compensation. Natural England consider open trenching to be a direct impact requiring compensation and we reiterate that this area would not be able to be considered for BNG as this must be secured for 30 years.

3. Landscape and Visual Impact Assessment

Natural England continues to advise that further evidence is required to support the assessment conclusions regarding significance of effect during construction. We have provided the following comments which should be clarified as part of the provision of further/updated evidence.

- A clear Assessment of impact on each Special Quality remains outstanding. Table A.1 (Appendix A Document 9.73.1) does not address each defining feature of the National Landscape and instead provides an overall assessment of impact. Narrative is not substantiated with audit/evidence for each feature. For example, the presence of the barge, landing operations, lighting, do not appear to have been considered within the assessment.
- It is not clear how impacts to the Heritage Coast have been considered.
- Impacts on the setting of the National Landscape via open trenching have not been included.
- The assessment cites the impact as small scale which is not appropriate. The impact must be considered on the special qualities of the National Landscape.
- The assessment conclusions rely on the temporary nature of impact. The impact of open trenching may extend into the longer term. The conclusion requires justification and in addition how avoidance of impact has been considered.
- It is not clear where compensation for significant cumulative impacts has been provided.

Natural England continue to advise that given the nature and location of the project within a National Landscape, it is not clear how alternatives to open trenching methods through the receiving landscape have been fully considered in line with the mitigation hierarchy. The mitigation hierarchy is considered at all stages of the s85 duty in order to first avoid impacts to Protected Landscapes.