



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

Appendix A5 to the Natural England Deadline 5 Submission

Natural England's Additional Comments on the Suffolk Onshore

For:

The construction and operation of the Sea Link Energy Cable.

Planning Inspectorate Reference EN020026

11th March 2026

Appendix A5 – Natural England’s advice on documentation related to Suffolk Onshore Ecology.

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

- [REP2-014] 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA (Clean)
- [REP2-015] 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA (Tracked Changes)
- [REP3-021] 6.2.4.1 Version D, Part 4 Marine Chapter 1 Physical Environment
- [REP3-029] 6.6 (E) Habitats Regulations Assessment Report (Tracked)
- [REP3-060] 9.17.1 Suffolk Drainage Strategy
- [REP3-077] 9.83 Outline Code of Construction Practice (Tracked)
- [REP3-079] 9.84: Register of Environmental Actions and Commitments (REAC)
- [REP3-064] 9.36 Applicants Comments on Other Submissions Received at Deadline 2
- [REP4-026] 6.2.2.2 (D) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Tracked Changes)

The following document has no further NE comment:

- [REP3-075] 9.82 Operational Noise Contour Plan for Saxmundham Converter Station

1. Summary

Natural England note that some of the risk and issues have now been resolved, including the noise contour map, public rights of way, the assessment of features that may be affected by dust soiling, and one of the points relating to acid grassland. Concerns remain around impacts from artificial lighting on designated features of Sandlings SPA and on Barbastelle bats. A new query has arisen from the Suffolk Drainage Strategy submitted at Deadline 3, which identifies that a permanent outfall serving Saxmundham converter station will feed into the Alde-Ore Estuary designations, and we advise this should be assessed within the Habitats Regulations Assessment. Post-consent measures relating to Horizontal-directional Drilling have been included, such as preparation of an HDD Landfall Method Statement, but these points remain open on our Risks and Issues log as we have advised information should be provided at consent

stage to inform decision making. Our previous queries relating to soil assessment are open awaiting submission of the updated Outline Soil Management Plan that the applicant is due to submit during the course of examination. Our advice relating to Functionally Linked Land to Sandlings SPA remains, as a clear and robust assessment is still required.

2. Detailed comments

Table 1: Natural England’s detailed comments on Suffolk Onshore

Document reviewed: [REP3-029] 6.6 (E) Habitats Regulations Assessment Report (Tracked)			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
A5.1	7.2.15	We note the applicant has included further clarity about the noise contour map in Appendix E Figure 3. They have clarified that the extent of the contour shown represents the expected extent of noise from the noisiest of the proposed activities, i.e. the maximum.	This resolves our query in Appendix A1 submitted at Deadline 1, NE Ref 7.
A5.2	7.2.17	<p>We note the amendments to paragraph 7.2.17 of the appropriate assessment stage of the Habitats Regulation Assessment (HRA), which confirms that lighting will be needed at the trenchless compound S10. This refers to commitment B38 of 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC), which states that:</p> <p>“Around construction compounds and the converter station and substation works areas, direct illumination of boundary features would be avoided. Lighting would be designed to comply with published guidelines [specifically, Bats and Artificial Lighting in the UK’ guidance Note (GN 08 / 23)...].” (square brackets showing additional text that has since been added to the REAC).</p>	A robust assessment of the impacts of lighting from construction compound S10 on Sandlings SPA birds and whether the proposed mitigation would be sufficient to avoid an adverse effect on integrity.

		<p>While we acknowledge that the construction compound S10 lighting has now been included in the appropriate assessment, and we welcome that illumination of boundary features will be avoided, we do not accept that the addition to paragraph 7.2.17 constitutes a robust assessment of potential impacts. We advise there is insufficient evidence for the conclusion that there will be no significant impacts to the designated features of Sandlings SPA arising from the HDD construction compound.</p>	
--	--	--	--

Table 2: Natural England’s detailed comments on Suffolk Onshore

Document reviewed: [REP3-060] 9.17.1 Suffolk Drainage Strategy			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
A5.3	4.2.7	<p>We note a permanent outfall serving the Saxmundum converter station is proposed to a tributary of the River Fromus, which feeds into the Alde-Ore Estuary designations approximately 6km downstream. We therefore disagree with the conclusion made in paragraph 4.2.37 of 6.6 (E) Habitats Regulations Assessment HRA that a Likely Significant Effect (LSE) on water quality to designated sites can be ruled out at the screening stage based on best practice pollution management alone. The potential for effects caused by</p>	<p>The potential risk to Alde-Ore Estuary SPA, Alde-Ore Estuary Ramsar and Alde-Ore & Butley Estuaries SAC should be assessed in the Habitats Regulations Assessment. Impacts to features of Alde-Ore Estuary SSSI, where they differ from those of the European sites, should also be assessed.</p>

		this outfall should be specifically addressed and assessed in the HRA.	
--	--	--	--

Table 3: Natural England’s detailed comments on Suffolk Onshore

Document reviewed: [REP3-077] 9.83 Outline Code of Construction Practice (Tracked)			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
A5.4	Table 1.1, measure GG32	We welcome that Public Rights of Way closures and diversions will be coordinated with East Anglia ONE North and East Anglia TWO Offshore Windfarms.	n/a
A5.5	Table 1.1, measure B59 and B60	We note the inclusion of measures B59 and B60, including preparation of a Horizontal Directional Drilling (HDD) Landfall Method Statement, Drilling Fluid Management Plan and HDD landfall hydrofracture modelling, as well as notifying Natural England of any changes to the drilling depth or location of HDD entry or exit points.	These post-consent measures are welcomed. However, points 10, 11 and 12 on our Risks and Issues log point out that outline information is needed at the consent stage to inform decision making.
A5.6	Table 1.1, measure B63	We advise reference to groundwater investigation surveys should be “ground investigation surveys”.	Amend text for clarity.

Table 4: Natural England’s detailed comments on Suffolk Onshore

Document reviewed: [REP3-064] 9.36 Applicants Comments on Other Submissions Received at Deadline 2			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
A5.7	Table 15, Point 13	We note the applicant’s point that the acid grassland mitigation/compensation area is not being proposed as mitigation for loss of Functionally linked Land (FLL) for Sandlings SPA during construction. Our advice remains that the assessment in document 6.6 Habitats Regulations Assessment, paragraphs 7.2.4 to 7.2.9, lacks sufficient clarity to be able to rule out an adverse effect on integrity.	Clear and robust assessment of the impacts of loss of Functionally linked Land on both designated features of Sandlings SPA within the HRA.
A5.8	Table 15, Point 13	We acknowledge the applicant’s point that the primary aim is to restore an area of acid grassland to good condition both botanically and in terms of structure, and that once restored the area will have consequential benefits for woodlark and skylark but that the purpose was not specifically for mitigation or compensation for those species.	This clarification answers our question in point A19 of our risks and issues log (ref 4 appendix A1 REP1-154 submitted at Deadline 1). Please note though that further clarity regarding acid grassland impacts and mitigation is still needed under point A20.

Table 5: Natural England’s detailed comments on Suffolk Onshore

Document reviewed: [REP3-021] 6.2.4.1 Version D, Part 4 Marine Chapter 1 Physical Environment			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
A5.9	1.7.6	<p>We note the changes made to Document 6.2.4.1 version D, Part 4 Marine Chapter 1 Physical Environment.</p> <p>Paragraph 1.7.6 states that the landfall site is within policy unit ALB14.1, and that the policy for Epoch 1 and 2 is for No Active Intervention, and for Epoch 3 Managed Realignment (MR). However, the landfall is actually within policy unit ALB14.2, which has a policy for MR within all three Epochs. Additionally, the policy for ALB14.1 was changed in 2015 and is also MR for all three Epochs.</p> <p>This information can be found on the gov.uk website: https://environment.data.gov.uk/shoreline-planning/unit/SMP7/ALB14.2</p> <p>However, we consider that this error does not alter the conclusions of the assessment. The offshore landfall transition bay will be more than 800m from the current coastline and the estimated erosion rate quoted in the report, based on the erosional frontages adjacent to the proposed HDD landfall point, is 77m by 2055 and 118m</p>	n/a

		by 2105. As long as the cable is at a depth that means it will not be exposed by beach lowering as the cliff line rolls back there should be no change to the assessment findings.	
A5.10	1.8.3	Paragraph 1.8.3 states an embedded mitigation measure for Coraline Crag is to not pre-cut trenches but use cable protection (rock bags and mattresses). However, in line with our comments in Appendix A3 to Natural England's Deadline 3 Submission comments on Suffolk Onshore Ecology, there is no assessment of the potential impacts of cable protection on the area particularly where the bedform is mobile in nature. In addition, as also raised in our Deadline 3 Appendix A3, the HDD exit pits are proposed to come up through an area of Coralline Crag and no assessment of potential impacts to this geological feature is provided.	We advise these potential impacts should be assessed.

Table 6: Natural England's detailed comments on Suffolk Onshore

Document reviewed: [REP4-026] 6.2.2.2 (D) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
A5.11	2.9.44	We note the term 'loop effect', which we had queried, has been changed to 'residual effect', resolving this query.	n/a

Table 7: Natural England's detailed comments on Suffolk Onshore

Document reviewed: [REP2-015] 9.34.1 Applicant's Comments on Relevant Representations Identified by the ExA (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
A5.12	Table 2.32, row A2 and A16	We welcome the applicant's commitment to further assessment work and submission of an updated Outline Soil Management Plan during the course of examination. We note this has not yet been received.	This point remains open on our Risks and Issues log as we are awaiting the updated Outline Soil Management Plan to be submitted during the course of examination.
A5.13	Table 2.32, row A9	We note that, while being in both high and medium categories, nationally designated sites where features may be affected by dust soiling have been assessed using the worst-case scenario, i.e. they have been treated as high sensitivity in the assessment. This resolves point A9 in our Risks and Issues log.	n/a

A5.14	Table 2.32, row A15	We note that the King Charles III England Coast path will remain open, as the crossing will be by HDD, which resolves point A15 in our Risks and Issues log.	n/a
A5.15	Table 2.32, row A3 and A17	We understand that the applicant has contacted Natural England's licensing service in line with our earlier advice. However, we are concerned that potential impacts to Barbastelle bats remain from artificial lighting and advise that the applicant contact our licensing team for advice.	We advise the applicant to engage further with our licensing service regarding potential impacts to Barbastelle bats from artificial lighting.

Table 8: Natural England's detailed comments on Suffolk Onshore

Document reviewed: [REP3-079] 9.84: Register of Environmental Actions and Commitments (REAC)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
A5.16	B60	As there is a commitment in the REAC that there will be no vehicle access to shingle habitats this resolves point A6 in our Risks and Issues log.	n/a