



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

Appendix A6 to the Natural England Deadline 6 Submission

Natural England's Additional Comments on Suffolk Onshore Ecology

For:

The construction and operation of the Sea Link Energy Cable.

Planning Inspectorate Reference EN020026

13th April 2025

Appendix A6 Sea Link Deadline 6 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:

- **[REP4-077]** 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk (Tracked Changes)
- **[REP5-037]** 6.6 (G) Habitats Regulations Assessment Report (Tracked Changes)
- **[REP5-131]** 9.119 Applicant's Comments on Late Responses to ExA First Written Questions
- **[REP5-135]** 9.123 Applicant's Responses to Second Written Questions

Natural England has also reviewed the following documents and noted the updates but has no further comment on them.

- **[REP5-002]** 2.3 (F) Land Plans Part 1 of 2
- **[REP5-028]** 6.3.2.2.1 (B) ES Appendix Nighttime Bat Walkover and Static Detector Survey Report (Tracked)
- **[REP5-069]** 7.5.3 (C) Outline Onshore Construction Environmental Management Plan (Tracked Changes)
- **[REP5-075]** 7.5.6.1 (D) Outline Air Quality Management Plan - Suffolk (Tracked Changes)
- **[REP5-084]** 9.17.1 (B) Suffolk Drainage Strategy (Tracked Changes)
- **[REP5-111]** 9.76.5.7 (B) Change Request Appendix G Tree Survey Report Schedule Extract Suffolk Onshore Scheme (Tracked Changes)
- **[REP5-112]** 9.76.5.8 (B) Change Request Appendix H Tree Constraints Plans Suffolk Onshore Scheme
- **[REP5-113]** 9.76.5.8 (B) Change Request Appendix I Tree Protection Plans Suffolk Onshore Scheme
- **[REP5-116]** 9.84 (C) Register of Environmental Actions and Commitments (REAC) (Tracked Changes)
- **[REP5-124]** 9.102 Operational Noise Contour Plan for Minister Converter Station
- **[REP5-125]** 9.107 Applicant's Response to Suffolk County Councils Deadline 4 Submission on Alternate Access to Saxmundham Converter Station
- **[REP5-132]** 9.121 Applicant's Comments on Other Submissions Received at Deadline 4

- **[REP5-133]** 9.121.1 Applicant's Comments on Other Submissions Received at Deadline 4 - Appendix A
- **[REP5-136]** 9.123.1 Applicant's Responses to Second Written Questions - Appendices
- **[REP5-143]** 9.130 Groundwater Heat Pollution - Technical Note (Clean)

1. Summary

Natural England continues to advise that further information should be provided regarding assessment of Functionally-linked Land for Sandlings SPA. We advise that cumulative onshore impacts between Sea Link and LionLink cannot be ruled out at this stage based on the information currently available. We continue to advise that further information is needed to evidence the feasibility of successful restoration of acid grassland in the proposed 6ha mitigation/compensation area in the proposed location, adjacent to a pig farm, and at the timescales suggested by the applicant.

2. Detailed Comments

Table 1: Natural England's advice on Suffolk Onshore Ecology

Document reviewed: [REP4-077] 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	5.3.1	Natural England notes the applicant has amended the text to state that acid grassland not being good quality does not meet the definition of Priority Habitat. We advise that if acid grassland is under-managed or inappropriately managed this will affect the quality of priority habitats, but they remain priority habitats.	

Table 2: Natural England's advice on Suffolk Onshore Ecology

Document reviewed: [REP5-037] 6.6 (G) Habitats Regulations Assessment Report (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
	5.2.7 & 5.2.8	Natural England notes the updated conclusions based on new information submitted by the Lion Link project for their Preliminary Environmental Impact Report.	n/a
	8.2	Natural England notes that Lion Link has been removed from the Suffolk Onshore Scheme in combination discussion due to the conclusions in section 5.2.8.	We advise that further information should be provided as above before cumulative onshore impacts between Sea Link and Lion Link can be ruled out. For example, potential impacts on Functionally Linked Land (FLL) between the projects has not been assessed.
	8.24	Natural England notes there is conflicting data regarding mitigation.	It is Natural England's understanding that the Applicant is not relying on the 6Ha grassland proposals in order to reach a

	<p>The Applicant has stated that it is not relying on the 6ha of acid grassland in order to conclude no AEOI for Sandlings SPA, however this remains in the HRA and appears to support reasoning for the conclusion of No AEOI -as follows:</p> <p><i>"Moreover, aside from any value it may have for SPA birds, acid grassland is an important and scarce habitat in itself. Therefore, as part of the broader habitat mitigation proposals for the Proposed Project approximately 6 ha of acid grassland will be restored, enhanced and maintained for 10 years following creation/restoration.</i></p> <p><i>Research indicates that vegetation that is kept suitably short and open, particularly if bare areas are created within the sward, is likely to be used for foraging by both species and may be used by nesting by woodlark. Ex1.5.7Ex1.4.15 Therefore, it is considered that no AEOI on the qualifying features of Sandlings SPA would arise from this impact pathway.</i></p> <p>In addition, we would welcome clarification on the following statement:</p> <p><i>"Temporary loss of functionally linked land for Sandlings SPA would arise from the Proposed Project through removal of acid grassland close to Sandlings SPA to enable the trenchless installation to be undertaken. This field would be occupied by surface construction infrastructure for approximately 6 months which would include the nightjar and woodlark nesting season. For the temporary duration of works this will be offset by leaving an area of arable land on sandy soils</i></p>	<p>conclusion of no AEOI. We advise that this should be removed in order to clarify what is being included as mitigation for direct and indirect impacts to FLL.</p> <p>Clarity regarding mitigation proposals as it is not how the proposals in 8.24 relates to impact pathways for FLL and the applicant's conclusions regarding acid grassland enhancement.</p> <p>These do not appear to be included in the commitments register. Does this refer to the 6ha acid grassland restoration area?</p>
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		<i>fallow and/or seeding it as acid grassland to be maintained for 10 years.”</i>	
Ex1.4.13 7.2.5	<p><u>FLL Extent of impact</u></p> <p>The quantity and location of acid grassland affected differs within the HRA.</p> <p>For example, Ex1.4.13 states that approximately 3.5 ha of acid grassland would be temporarily lost, whereas 7.2.5 reiterates that 3.5 ha of acid grassland and in addition: <i>“a further area (totalling approximately 4 ha) of acid grassland north of the golf course would also be temporarily removed while it is traversed by the cable trench”</i>.</p> <p>Therefore, the total should be 7.5 ha of FLL directly affected and consistently reported through the HRA. We continue to advise that clarity is required regarding the nature, location, quantity, timing and duration of all possible impacts to acid grassland FLL.</p>	<p>The total of FLL lost should be 7.5. We continue to advise that clarity is required regarding the nature, location, quantity, timing and duration of all possible impacts to acid grassland FLL.</p> <p>Lack of clarity and inconsistency requires attention, and we wish to draw the ExA attention to an error in the REIS.</p> <p>Section 3.3.11 states that <i>“<u>The HRA Report [APP-090] acknowledged temporary loss of 3.5ha of acid grassland adjacent to Sandlings SPA</u>”</i>.</p> <p>It is Natural England’s understanding that 7.5 Ha of FLL will be directly affected.</p> <p>We note and welcome that the ExA has requested additional Information regarding impacts to FLL for the Sandlings SPA within Section 3.3.11</p>	

Table 3: Natural England's advice on Suffolk Onshore Ecology

Document reviewed: [REP5-135] 9.123 Applicant's Responses to Second Written Questions			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
	2LVIA5	The applicant states "The cable route in this area will be restored to the existing condition which will include restoration of acid grassland to a higher quality than its current quality, some scrub species and occasional trees." Natural England advises that this sentence is not clear. Where the applicant states 'restoration of acid grassland to a higher quality than its current quality' does this refer to the 6ha mitigation/compensation land? If not then the sentence appears to contradict what has been stated elsewhere, for example, we note that 6.7.3 of the oLEMP states that, " <i>The success criteria for the restored areas of acid grassland will take account of the baseline condition.</i> "	The Applicant should clarify what is meant by restoration of acid grassland to a higher quality than its current quality. Furthermore, the commitments register should include contingency measures should reinstatement plans fail, or should reinstatement not be achievable within the timeframes stated. This is particularly important for acid grassland, and for this habitat, the commitments register should reflect the contingency measures described in 6.7.3 of the oLEMP

Table 4: Natural England's advice on Suffolk Onshore Ecology

Document reviewed: [REP5-131] 9.119 Applicant's Comments on Late Responses to ExA First Written Questions			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
	1ECOL65	Natural England notes the applicant states there is no requirement for pH testing or fertility assessment on the area of land proposed for acid grassland restoration because there is already acid grassland present, albeit in a degraded condition. We wish to clarify that our advice relates to the feasibility of restoring acid grassland to the intended condition given the presence of the nearby pig farm.	Natural England continues to advise that further information is needed to evidence the feasibility of successful restoration of acid grassland in the proposed location at the timescales suggested by the applicant. A clear Management Plan including baseline status and objectives should be provided. It appears that the 6ha contains

	<p>We advise that the influencing factors of the pig farm and land use (on the pH of the soil for example) may restrict the project's ability to restore acid grassland as stated. This is therefore a risk to stated outcomes. The fact that the management is limited to 10 years is a further limiting factor. In addition, it is unclear if the rotation regime will include movement of the pigs in closer proximity to the 6ha area during the 10- year period.</p> <p>It remains unclear why the acid grassland reinstatement cannot be secured for the lifetime of the project and what the intended use of this area of land will be post the ten-year period.</p> <p>We advise that the influencing factors of the pig farm and land use may restrict the project's ability to restore acid grassland as stated. This is therefore a risk to stated outcomes. The fact that the management is limited to 10 years is a further limiting factor.</p>	<p>deciduous woodland and additional habitat of biodiversity value, which should not be deleteriously impacted by the proposals.</p>
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