



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

Appendix A7 to the Natural England Deadline 7 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

29th April 2026

Appendix A7 Sea Link Deadline 7 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:

- **[REP6-051]** 6.6 (H) Habitats Regulations Assessment Report (Tracked Changes)
- **[REP6-019]** 6.2.2.2 (E) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Tracked Changes)
- **[REP6-067]** 7.5.10.1 (B) Outline Soil Management Plan – Suffolk (Tracked Changes)
- **[REP6-122]** 9.147 Outline Operational Lighting Management Plan
- **[REP6-135]** 9.84: Register of Environmental Actions and Commitments (REAC)

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

- **[REP6-002]** 2.3 (G) Land Plans Part 1 and 2
- **[REP6-003]** 2.7 (C) Access, Rights of Way and Public Rights of Navigation Plans
- **[REP6-075]** 7.5.3 (D) Outline Onshore Construction Environmental Management Plan (Tracked Changes)
- **[REP6-077]** 7.5.6.1 (E) Outline Air Quality Management Plan - Suffolk (Tracked Changes)
- **[REP6-057]** 7.12.1 (C) Design Principals - Suffolk (Tracked Changes)
- **[REP6-079]** 7.5.7.1 (D) Outline Landscape and Ecological Management Plan - Suffolk (Tracked Changes)
- **[REP6-098]** 9.110 Inter-Project Cumulative Effects Assessment Update - Technical Note
- **[REP6-083]** 7.5.8.1 (C) Outline Construction Noise and Vibration Management Plan - Suffolk (Tracked Changes)
- **[REP6-087]** 7.5.9.1 (B) Outline Public Rights of Way Management Plan - Suffolk (Tracked Changes)

Summary

Natural England notes the further information from the applicant regarding the Saxmundham Converter Station outfall, artificial lighting, unexploded ordnance (UXO) investigations and functionally linked land for Sandlings Special Protection Area (SPA). We recommend several additions to the Register of Environmental Actions and Commitments (REAC):

1. to monitor runoff from the Saxmundham Converter station;

2. to specify lighting restrictions within commitment B23 and to include the need to increase barrier height in response to any lit machinery or structures above 3m;
3. and to conduct UXO investigations outside the core wintering and breeding bird seasons.

Having reviewed the further information relating to the loss of foraging habitat for woodlark and nightjar within functionally linked land for Sandlings SPA, we concur with the conclusion of no adverse effect on site integrity.

Natural England also highlights the concern that new information has been added to REP6-019 and REP6-051 at this late stage of the Examination period. We have tailored our advice accordingly, given the information and evidence made available to us at Deadline 6.

Natural England notes that additional information has been provided at Deadline 6 from the Applicant regarding the need for a terrestrial unexploded ordnance (UXO) investigation at the proposed trenchless launch pit, along the route of the trenchless installation, and other locations close to the North Warren RSPB Reserve and Leiston-Aldeburgh SSSI. Given the mitigation measures proposed, around timing for example, we would recommend that the Register of Environmental Actions and Commitments (REAC) is updated to include an additional requirement for the UXO investigation and disposal to give confidence that impacts to the designated site will be avoided or minimised. As this matter has come to light late in the Examination, we recommend that these measures are secured through an appropriately worded REAC commitment.

Natural England welcomes the clarity provided in relation to the outfall discharges from Saxmundham Converter Station. With this new information provided by the Applicant at Deadline 6 we advise that as Alde-Ore estuary designated sites are approximately 6km downstream, a robust water quality monitoring programme, including measurements of biological and chemical parameters, for any discharged water is implemented to support the Applicant's conclusions and ensure that runoff does not result in further impacts to the sites. As above, as this matter has come to light late in the Examination, we advise that these measures are secured through an additional, appropriately worded REAC commitment detailing the chemical and biological parameters that the discharged water will meet and how this will be monitored and managed throughout the lifetime of the project.

1. Detailed Comments

Table 1: Natural England's advice on Suffolk Onshore [REP6-051]

Document reviewed: [REP6-051] 6.6 (H) Habitats Regulations Assessment Report (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	4.2.46	<p>Natural England notes that the HRA has been updated to include the permanent outfall associated with the Saxmundham Converter Station which discharges to a tributary of the River Fromus and has a downstream connection to the Alde-Ore Estuary designated sites. We note that the outfall will only carry surface water runoff and that this will be attenuated in Sustainable Drainage Systems (SuDS) to achieve green field runoff rates in line with the requirements of the receiving watercourse authorities.</p> <p>Natural England welcomes the clarity provided in relation to the discharges, and we note that the Alde-Ore Estuary designated sites are approximately 6km downstream. However, we would expect there to be a robust monitoring programme to ensure that runoff does not result in impacts, and we would recommend that a monitoring programme is implemented, including measurement of biological and chemical parameters for any discharged water, to ensure this is the case.</p>	<p>Natural England welcomes the clarity provided in relation to the discharges. With this new addition we advise that a robust water quality monitoring programme, including measurements of biological and chemical parameters, for any discharged water is implemented to support the Applicant's conclusions and ensure that runoff does not result in further impacts to the sites.</p> <p>As this matter has come to light late in the Examination period, we recommend that an appropriately worded commitment should be added to the REAC detailing the chemical and biological parameters that the discharged water will meet and how this will be monitored and managed throughout the lifetime of the project.</p>
2	7.2.4	<p>Natural England welcomes the further information that has been provided by the Applicant relating to the assessment of temporary impacts to Functionally Linked Land (FLL) for Sandlings SPA, following our advice. We</p>	<p>Natural England notes that there will be a temporary loss of foraging habitat for woodlark and nightjar while the cable trenching works take place. We note that that these impacts will be short-term and reversible, and given the availability of</p>

		note that the applicant has calculated that the affected area comprises less than 5% of the available foraging and nesting habitat for woodlarks, and a lower percentage for nightjars because they can also use woodland and scrub for foraging.	alternative foraging sites in the area, we concur with the conclusion of no adverse effect on site integrity.
3	7.2.19	<p>Natural England welcomes the additional information provided by the Applicant regarding lighting impacts to Sandlings SPA. We note that: <i>“the only features that would be above 3 m would be the top of the HDD rig, recycling system and excavator boom and if the lighting columns themselves are required to be above 3m in height, this would be captured by B23 which stipulates the barrier must be a minimum of 3 m height. Specific shields and additional barriers could therefore be added if needed.”</i></p> <p>We note that Commitment B23 is referenced, however B23 specifically cites noise mitigation, and we therefore advise that lighting is specifically referenced to ensure clarity regarding this impact pathway and that the correct monitoring is adopted.</p>	<p>Natural England presumes that the haul roads will not be lit.</p> <p>We recommend that an additional commitment is included within the REAC which specifically relates to compound lighting and the need to increase height in response to any lit machinery or structures above 3m, and in addition, that monitoring relates to lighting impacts.</p>
4	7.2.22	<p>Natural England notes that Unexploded Ordnance (UXO) investigation will be needed at the proposed trenchless launch pit and along the route of the trenchless installation in North Warren RSPB Reserve and Leiston-Aldeburgh SSSI. We also note that detonation of UXO in situ may be required.</p>	<p>Given the mitigation measures proposed, around timing for example, we would recommend that the Register of Environmental Actions and Commitments (REAC) is updated to include an additional requirement for the UXO investigation and disposal to give confidence that impacts to the designated site will be avoided or minimised.</p> <p>To minimise the likely impact to designated sites, Natural England advises that the UXO investigations should be undertaken outside of the core wintering and breeding bird</p>

			<p>seasons. This should then ensure that any required detonation will be undertaken within the least disturbing period of the year for birds associated with the designated sites.</p> <p>As this matter has come to light late in the Examination, we recommend that the measures above are secured through an appropriately worded REAC commitment.</p>
--	--	--	---

Table 2: Natural England's advice on Suffolk Onshore [REP6-019]

Document reviewed: [REP6-019] 6.2.2.2 (E) 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
1	2.9.27	Regarding the changes to the assessment of impacts to Functionally Linked Land (FLL) for Sandlings SPA, please see our comments above relating to the Habitats Regulations Assessment section 7.2.4.	Please see our comments above relating to the Habitats Regulations Assessment section 7.2.4 (Tab1 point 2).
2	2.9.49 - 2.9.51	Regarding UXO investigation, please see our comments above relation to the Habitats Regulations Assessment section 7.2.22.	Please see our comments above relation to the Habitats Regulations Assessment section 7.2.22 (Table 1 point 4).

Table 3: Natural England's advice on Suffolk Onshore [REP6-067]

Document reviewed: [REP6-067] 7.5.10.1 (B) Outline Soil Management Plan – Suffolk (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	General comment	Natural England welcomes that ALC survey data has been provided and incorporated into the updated Outline Soil Management Plan. Due to the submission at this late stage	n/a

		of the examination period, we have not been able to review this with our specialists to provide specific advice.	
--	--	--	--

Table 4: Natural England's advice on Suffolk Onshore [REP6-135]

Document reviewed: [REP6-135] 9.84 (D) Register of Environmental Actions and Commitments (REAC)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Regarding visual disturbance to Sandlings SPA	As above we note that additional information regarding the 3m barrier has been included however the associated REAC commitment should specifically reference lighting and monitoring.	Natural England recommends that an additional commitment is included within the REAC which specifically relates to compound lighting and the need to increase height in response to any lit machinery or structures above 3m, and in addition that monitoring relates to lighting impacts.
2	Regarding UXO works	To minimise the likely impact to designated sites, Natural England advises that the UXO investigations should be undertaken outside of the core wintering and breeding bird seasons. This should then ensure that any required detonation will be undertaken with the least disturbing period of the year for birds associated with the designated sites.	As this matter has come to light late in the Examination, we recommend that our advice regarding UXO is secured through an appropriately worded REAC commitment.
3	Regarding Hydrological Impact pathways	To ensure that runoff does not result in impacts to the Alde-Ore Estuary designated sites.	As this matter has come to light late in the Examination, we recommend that an appropriately worded commitment should be added to the REAC detailing the chemical and biological parameters that the discharged water will meet and how this will be monitored and managed throughout the lifetime of the project.