

## **EN020033**

### **LionLink Interconnector**

### **Section 51 Advice Log**

### **Version: 02 December 2025**

There is a statutory duty under ['section 51 \(s51\) of the Planning Act 2008'](#) for The Planning Inspectorate (PINS) to record the advice that it gives in relation to an application or potential application, and to make this publicly available.

This document comprises a record of the advice that has been provided by The Planning Inspectorate to the applicant and their consultants during the pre-application stage. It will be updated by The Planning Inspectorate after every interaction with the applicant during which s51 has been provided. The applicant will always be given the opportunity to comment on The Planning Inspectorate's draft record of advice before it is published.

The applicant will use this advice log as the basis for demonstrating regard to s51 advice within the application.

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<a href="#">7 April 2025</a>	Project Update Meeting (PUM)
<a href="#">12 November 2025</a>	Project Update Meeting (PUM)

## LionLink Interconnector - s51 Advice Library

Topic	Meeting date: 7 April 2025
Flood Risk and Environment Agency Data	<p>PINS advised the applicant that the Environment Agency (EA) has published new flood risk and coastal erosion data in March 2025, and that the applicant's assessment work should take account of new data as and when it is published. The EA has written to applicants and copied PINS, setting out its expectations for how the updated data should be considered. PINS highlighted that the EA is expected to continue making regular updates to this data, so the applicant should keep an eye on these and reflect them in the assessment work accordingly.</p>
Post-scoping updates: Cumulative Effects with Other Projects	<p>The applicant stated that there are 3 developments listed in the Scoping Opinion which it does not consider need to be assessed for cumulative effects in the environmental statement (ES) as there is no geographical overlap of the zones of influence (Zol). These projects are North Falls and Five Estuaries offshore windfarms, and Nautilus Interconnector.</p> <p>PINS advised that whilst the Scoping Opinion cannot be changed, the applicant may seek to agree with relevant consultation bodies such as the local authorities, and other statutory consultation bodies as relevant to the ES aspect, that developments can be scoped out of the cumulative assessment where it can be demonstrated that significant effects are not likely to occur. PINS advised that this should be evidenced in the ES.</p>
Post-scoping updates: Options and Scenarios	<p>The applicant updated on the approach to the Preliminary Environmental Impact Report (PEIR) with two scenarios for the substation (amendment and build out), options for the High Voltage Alternating Current (HVAC) cable route (two options) and options for the High Voltage Direct Current (HVDC) cable route (two options aligned with other project interfaces).</p> <p>As above, PINS advised that it was open to the applicant to do so with agreement from relevant statutory consultation bodies and this approach should be evidenced in the ES.</p>
Post-scoping updates: Pakefield to East Bavents Site of Special	<p>The applicant stated that its preferred landfall location at Walberswick means that Pakefield to East Bavents SSSI would be avoided as this was aligned with the landfall option at Southwold. It is proposing to scope out assessment of impacts to the SSSI from the ES on that basis. As above,</p>

Scientific Interest (SSSI)	PINS advised that it was open to the applicant to do so with agreement from relevant statutory consultation bodies and this approach should be evidenced in the ES.
Post-scoping updates: Order Limit Extension	<p>The applicant advised of the extension of the project boundary to accommodate overhead line works (close to the substation) and to accommodate an alternative access over the Fromus River (to the Converter Station) and offshore associated with an area of aggregate abstraction.</p> <p>As above, PINS advised that it was open to the applicant to do so with agreement from relevant statutory consultation bodies and this approach should be evidenced in the ES.</p>
Programme Documents and Issue Resolution	<p>PINS advised that if there is no update to the applicant's programme there is no need to update the PD. Instead, PINS advised that where change occurs e.g. Issues identified early in the process get resolved during pre-application, these should be noted as a "benchmark" so this can be cross-referenced through the applicant's application documents. This progression should be reflected in the PD to demonstrate resolution of matters prior to submission. The PD should also highlight in advance any need for PUMs, multi-party meetings and Agendas should be issued well in advance.</p>
Engagement with Local Action Groups	<p>PINS advised the applicant to consider engagement with local action groups e.g. Substation Action Save East Suffolk (SASES). The applicant noted they had not undertaken specific engagement with such groups to date and PINS advised that they should consider early engagement with these groups and to mitigate any concerns (if possible) so as to limit possible issues being raised/examined, should the application be considered for Examination. While it may not be possible to minimise all issues, engaging with these groups could help minimise any potential concerns.</p>
Natural England and the Habitats Regulations Assessment (HRA)	<p>Following its appraisal process, the applicant has identified Walberswick as the preferred landfall location, as it would require a shorter cable route and have reduced environmental impacts compared to the Southwold option. Whilst it would result in the cable crossing through Minsmere-Walberswick Special Protection Area (SPA) the applicant confirmed that a trenchless crossing technique such as horizontal directional drilling (HDD) is proposed to avoid direct habitat loss. There may be other construction phase impacts which will be identified and assessed as part of the</p>

	EIA and evidenced within the ES. The applicant confirmed that they are continuing engagement with Natural England (NE) about the Habitat Regulations Assessment (HRA) and would be undertaking an evidence plan process (EPP). PINS requested the applicant to provide progress updates in future project meetings, including NE's position on whether there would be adverse effects on integrity of the European sites and the need for a derogations' case and compensatory measures.
Protected Landscapes and DEFRA Guidance	PINS advised the applicant that new guidance was published by Department for Environment, Food and Rural Affairs (DEFRA) in December 2024 regarding the amended duty in respect of functions that affect Protected Landscapes, including National Landscapes, under s85 of the Countryside and Rights of Way Act (CRoW Act) introduced by the Levelling Up and Regeneration Act (LURA). This guidance may have implications for the applicant's assessment work in respect of the Suffolk and Essex Coast & Heaths National Landscape and should be considered in the ES. The guidance is available at the following link: <a href="#">Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK</a> .
Land Rights Tracker	PINS advised the applicant to maintain a proper land rights tracker that does not simply remove resolved land parcels. Instead, the tracker should keep a record of what land was initially affected and how it was resolved. PINS noted that issues resolved during the pre-application stage, might possibly be discussed during an examination due to minimal evidence being reflected via application documents and therefore maintaining a record and ensuring accurate information is provided might mitigate the need to examine such matters.
Project Presentation Request	PINS requested that the applicant provide a short presentation in the next PUM, to explain the scheme and proposed operation, including any visuals. PINS also advised that any updated programme document should be provided at least 2 weeks in advance of any PUM.
<b>Topic</b>	<b>Meeting date: 12 November 2025</b>
Statutory Consultation	<p>The applicant confirmed that it will be carrying out multiple public events and webinars as part of its statutory consultation between 13 January 2025 to 10 March 2026.</p> <p>PINS noted to the applicant that the events for DCO examination associated to Sea Link was being undertaken</p>

	<p>during the same timeframe in close proximity to the public statutory consultation events proposed by the applicant.</p> <p>PINS advised the applicant to be mindful of submissions and comments being received for the proposed Sea Link project which also references Lionlink and further advised the applicant to make it clear in their communications that they are separate standalone projects.</p>
Preliminary Environment Information Report (PEIR)	<p>PINS noted that the applicant had identified resource constraints with statutory bodies as being an issue during pre-application consultation and asked if there were specific organisations or if it was a general issue. The applicant confirmed that resourcing constraints were mainly for the host local authority, but it is still engaging with it through monthly meetings.</p> <p>PINS asked the applicant to explain its approach where there are cross-project issues, for example in relation to the proposed crossing of the River Fromus, noting that there had been representations submitted on this matter to the Sea Link project. The applicant confirmed that engagement is ongoing between themselves and host local authorities regarding the proposed crossing, as similar issues were flagged to it. The applicant is paying close attention to the progress of Sea Link on this and other matters and confirmed that its approach to design refinement would be informed by emerging information as relevant.</p> <p>PINS asked the applicant if it was still progressing a Water Framework Directive (WFD) assessment. The applicant stated that 2 WFD assessments were being progressed (onshore and offshore) and that the draft assessment work would be shared with the EA for comment. The applicant confirmed it would provide an overview of the assessment via email or at the next project update meeting.</p>
HRA and Marine Conservation Zone (MCZ) assessment	<p>The applicant confirmed that an MCZ assessment would not be provided with the DCO application. It stated that the modelling and assessment work carried out confirmed the position in the scoping report that the closest MCZ was too distant from the proposed development to be affected.</p> <p>The applicant stated that it is in regular conversations with NE about the HRA, confirming its intention to share the Stage 1 screening. PINS asked about the status of the HRA noting that the applicant's updated programme document showed that Stage 1 screening was complete but did not refer to Stage 2 assessment. Reference was also made to further survey work being awaited. The applicant stated that its current position was that Stage 2 assessment had not</p>

	<p>commenced but that survey work, which has been carried out to inform HRA Stage 2 was expected to be complete.</p> <p>PINS noted that elsewhere the applicant referred to HDD being used as mitigation to avoid potential effects to European sites, and noted that in accordance with relevant caselaw, where mitigation is proposed because of impacts to European sites, it should be considered for the test of adverse effects on integrity in a Stage 2 assessment.</p> <p>The applicant stated that it would discuss this matter with its ecologist, and it was agreed that a separate call would be arranged to provide clarification on its approach.</p>
Biodiversity net gain (BNG)	<p>PINS asked the applicant about progression of its BNG assessment. The applicant confirmed it has not held detailed discussions with NE; however, it has carried out initial calculations and its ecology lead is exploring options in the local area.</p>
Sea Link	<p>PINS asked the applicant how the LionLink project would be affected if the Sea Link DCO application was refused. the applicant stated that the project is constructable in its own right and has the option to act as a stand-alone project in the event of Sea Link being refused development consent.</p> <p>PINS advised that several representations had been submitted into the Sea Link examination about the tentative East Atlantic Flyway World Heritage Site (WHS), which spanned sections of the eastern coast of England and incorporated several designated European sites.</p> <p>PINS noted that NE had also raised this matter on a recent scoping (Eastern Green Link 5). The applicant confirmed that it was aware of this matter. PINS advised that there may be further information submitted to the Sea Link examination in response to examining authority questions, which the applicant may wish to consider in its assessment approach.</p>
Programme Document	<p>The applicant talked through its updated programme document and confirmed that it intends to publish the programme document on its website by January 2026. PINS commented that additional information on the programme document could be helpful. PINS referred the applicant to its comments on the last iteration of the programme document and advised the applicant to address these, for example providing a clearer picture of key issues and proposals for pre-application engagement with statutory bodies. PINS also asked the applicant to identify the additional meetings it would like over the next year on their updated programme document. This would assist in resourcing effectively for the project.</p>

Land Rights, Negotiations Tracker and Issues Tracker	<p>PINS highlighted for the applicant the updated pre-application prospectus that was recently updated. PINS advised the applicant that they will need to provide an updated land rights tracker and negotiations tracker alongside its issue tracker, with a preference for these to be provided by the applicant over the next year. PINS advised the applicant to take examples of how to set out its trackers from Sea Link as the most similar project.</p> <p>PINS also recommended the applicant take examples from Mona Offshore Wind, as there are multiple iterations of the trackers from that project that had a lot of contributions from the examining authority as to what they would expect on an issues tracker.</p> <p>PINS further advised that the applicant provide all the issues they have with the project on the issues tracker so that PINS can have access as early as possible and provide advice as early as possible.</p>
Document Submission	<p>The applicant highlighted its intention to submit documents electronically with cover letters for each stage of the project. PINS asked at which stage of the project does this become relevant, to which the applicant confirmed it will cover each stage of the project. Following this confirmation, PINS confirmed that application documents will now be submitted through SharePoint during acceptance and there is an online form to submit documents during examination.</p>
Submission Date	<p>The applicant highlighted that they intend to submit the project in quarter 4 of 2026. PINS reminded the applicant that, due to the recent changes in the pre-application prospectus, we now request a specific month for applicant's intended submission dates from all projects. PINS suggested October, to which the applicant said they will need to go back to the programme team and confirm a month at a later time.</p>