

LionLink Interconnector

Section 51 Advice Log Version: 27/07/2026

This document comprises a record of the s51 advice that has been given by the Planning Inspectorate to the applicant National Grid Lion Link Limited (NGLLL) during the pre-application stage. It will be updated by the Planning Inspectorate after every interaction with the applicant within which s51 advice has been given.

The applicant will always be given the opportunity to comment on the Planning Inspectorate's draft record of the s51 advice given before it is published on the relevant project page on the [Find a National Infrastructure Project website](#).

The role of the advice log at the acceptance stage

Section 55(4) of the PA2008 requires the Planning Inspectorate to consider, amongst other things, the extent to which the applicant has had regard to the s51 advice given by the Planning Inspectorate in connection with the application when deciding if the application can be accepted for examination. Section 51 advice includes:

- advice given about applying for an order granting development consent
- advice given about making representations about an application for an order granting development consent

The applicant will use this advice log as the tool for demonstrating:

- regard to the s51 advice given to the applicant by the Planning Inspectorate
- regard to any s51 advice given to others by the Planning Inspectorate

The applicant will submit a final version of this advice log which demonstrates regard to all s51 given by the Planning Inspectorate at the pre-application stage as part of the application.

LionLink Interconnector – Applicant meeting index

Date of meeting	Meeting overview
07 April 2025	Project Update Meeting (PUM)
12 November 2025	Project Update Meeting (PUM)
05 December 2025	Ecology Update Meeting
02 June 2026	Project Update Meeting (PUM)
15 July 2026	Advice in relation to amendments to the Planning Act 2008 (PA2008)
24 August 2026	Advice requested from the applicant

LionLink Interconnector – Log of s51 given to the applicant

7 April 2025

Topic	s51 advice given	Applicant regard to s51 advice given
Flood Risk and Environment Agency Data	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.	Demonstration of regard
Post-scoping updates: Cumulative Effects with Other Projects	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 (Zoi). These projects are North Falls and Five Estuaries offshore windfarms, and Nautilus Interconnector.	

	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.	
Post-scoping updates: Options and Scenarios	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). 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.	
Post-scoping updates: Pakefield to East Bavents Site of Special Scientific Interest (SSSI)	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, 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	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. 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.	
Programme Documents and Issue Resolution	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.	
Engagement with Local Action Groups	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.	
Natural England and the Habitats Regulations Assessment (HRA)	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 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: Guidance for relevant authorities on seeking to further the	

	purposes of Protected Landscapes - GOV.UK.	
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.	
12 November 2025		
Topic	s51 advice given	Applicant regard to s51 advice given
Statutory Consultation	The applicant confirmed that it will be carrying out multiple public events and webinars as part of its statutory consultation	Demonstration of regard

	between 13 January 2025 to 10 March 2026. PINS noted to the applicant that the events for DCO examination associated to Sea Link was being undertaken during the same timeframe in close proximity to the public statutory consultation events proposed by the applicant. 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.	
Preliminary Environment Information Report (PEIR)	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. 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. 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.	
HRA and Marine Conservation Zone (MCZ) assessment	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.	

	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 commenced but that survey work, which has been carried out to inform HRA Stage 2 was expected to be complete. 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. 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.	
Biodiversity Net Gain (BNG)	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.	
Sea Link	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. 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. 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.	
Programme Document	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.	
Land Rights, Negotiations Tracker and Issues Tracker	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. 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. 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.	
Document Submission	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.	
Submission Date	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.	
05 December 2025		
Topic	s51 advice given	Applicant regard to s51 advice given
HRA assessment	The applicant proposes to separate onshore and offshore matters in its Stage 2 assessment (report to inform appropriate assessment). PINS advised that there is no prescribed format for HRA and it was content for the applicant to use this structure provided it supports good engagement and clear presentation of issues. Cross-referencing should be used as needed. The applicant will produce a principal agreement and issues log, upon which it will seek NE comment, and it is considering how to present this in the DCO application documentation. The Inspectorate welcomed this approach and advised that clear explanation of outstanding principal issues and the parties' respective positions would be beneficial.	Applicant to complete
02 June 2026		
Topic	s51 advice given	Applicant regard to s51 advice given
Section 35 Direction	PINS noted that the section 35 direction was issued by the SoS in 2022. The project has	

	progressed significantly since the direction was issued. PINS advised the applicant to consider whether it may need to seek confirmation that the s35 direction as issued was still applicable for the proposed DCO application to be submitted.	
Cross-Border Project Elements	PINS requested a high-level update on the status of the Dutch elements of the project, including both onshore and offshore components, to understand programme alignment and consenting progress. The applicant shared a link to the TenneT project website. The applicant requested advice on its proposed approach to cumulative assessment of the proposed development with the TenneT components of the project. It was agreed that the applicant would issue a note for PINS to review later in June 2026.	
Transport and Cumulative Effects	PINS advised that transport documentation should clearly demonstrate coordination with other major projects in the area, including construction programmes and cumulative impacts on the highway network. PINS advised the applicant to demonstrate how it is proposed to coordinate transport impacts arising from the proposed development with other infrastructure, particularly in response to issues raised during statutory consultation.	

Environmental Assessment and Surveys	PINS requested that the applicant provide an overview of further environmental surveys planned for 2026. The applicant confirmed the surveys were primarily for protected species (mainly bats) and habitats and it had discussed the approach to bat and bird surveys with specialists at Natural England. PINS advised that the applicant's HRA documentation should be presented clearly, taking into account lessons learned from previous projects where ambiguity and inconsistency had resulted in examination questions to clarify matters. There should be consistency between the main report and summary tables, and clear conclusions on all European sites and features assessed for each likely significant effects pathway.	
Programme Submission and Timing	PINS advised that programme documentation should clearly set out intended submission timelines and be kept up to date publicly. PINS advised of the importance of avoiding key periods where resources are likely to be lower, e.g., for statutory consultation and adequacy of consultation request engagement where possible, as the applicant had noted their intention to submit certain consultation documents later in 2026.	

Consultation Report	PINS advised the applicant if providing its draft consultation report structure for review, that it should clearly distinguish between consultation completed and any ongoing engagement activities.	
Issues Tracking	The Inspectorate advised that the Government response on BNG consultation had been published and that BNG for NSIPs would be mandatory for applications made on or after 2 November 2026. The Inspectorate advised that the consultation response included an updated model biodiversity gain statement. The applicant was aware that Defra published a series of links to further guidance on BNG for NSIPs on 2 June 2026.	
15 July 2026		
Topic	s51 advice given	Applicant regard to s51 advice given
Advice in relation to amendments to the Planning Act 2008 (PA2008)	In light of the amended legal framework which will be introduced from 24 July 2026 by the Planning and Infrastructure Act 2025, the Planning Inspectorate issued written advice to the applicant on 15 July 2026 requesting for: evidence within the submitted application in relation to duties under s46 and s48 of the PA2008 to be provided as an appendix to any engagement summary document that	

	the applicant may choose to submit or, where the applicant chooses not to submit such a document, as a discrete document titled 'Section 46 and section 48 information' evidence within the submitted application in relation to new s55(4)(e) of the PA2008 to be provided in a submission version of this expanded advice log template	
24 August 2026		
Topic	s51 advice given	Applicant regard to s51 advice given
The Dutch components of the LionLink Project within the Environmental Statement (ES). Email from the applicant to the Planning Inspectorate 21 July 2026	Thank you for the below and apologies for the delay in getting back to you. Please see our response below, which will be published on our website along with your original email: Applicant proposed approach: The Project connects from Kiln Lane Substation in the UK to a Dutch Offshore Converter Station. The Project therefore comprises infrastructure located within both UK and Dutch jurisdictions. The Proposed Scheme seeking consent in the UK is from the Kiln Lane Substation in Suffolk to the High Voltage Direct Current	

	cable at the edge of the UK-Dutch European Economic Zone (EEZ) border. The remainder of the Project is the continuation of the High Voltage Direct Current Cable in the Dutch EEZ to a Dutch Offshore Converter Station. This section is referred to as the 'Dutch Offshore Scheme' TenneT, National Grid's partner for the Project, submitted a separate consent application for the Dutch Offshore Scheme works within the Dutch EEZ in August 2025. A separate Dutch project, Nederwiek 3, is to deliver the construction of the offshore converter station at an offshore wind farm to which the cables for the Project will connect to. This will be referred to as the 'Dutch Connection Scheme'. Our proposed approach is for the ES submitted with the DCO application to assess the environmental effects of the Proposed Scheme only, whilst providing sufficient information on the Dutch Offshore Scheme to enable the Examining Authority to understand the relationship between the UK and Dutch components and any relevant transboundary considerations. This will allow an understanding of the environmental effects of the whole project. We are engaged with Tennet to obtain the environmental information that has been submitted for the	
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	Dutch Offshore Scheme. Inspectorate response: The Inspectorate welcomes the proposed approach. Whilst the Dutch Offshore Scheme and Dutch Connection Scheme are subject to separate consenting processes and do not form part of the NSIP, the Inspectorate advises that the ES should have a description of the Dutch components (maximum parameters) based on the latest information available to the applicant, and it should confirm the status of the associated consenting processes. The description of reasonable alternatives in the ES should include as relevant any consideration given to routeing and technology options based on the whole project effects on the environment. The applicant may wish to provide a separate document summarising the project components, and the outcome of individual environmental assessments for each component, which could form an appendix to the ES. This approach was used on the IFA2 project, as part of the UK onshore planning application made to Fareham Council (P/16/0557/OA) – please see the attached document for	
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	information. Applicant proposed approach: Our current understanding is that construction activities would be programmed so that installation of the offshore cable is undertaken as a continuous, linear activity from one jurisdiction into the next. On this basis, the construction methods and scheme characteristics would be consistent across both jurisdictions, including in the vicinity of the EEZ boundary. <i>[NGV and TenneT are jointly procuring our Offshore Contractors. This means that terms, conditions and standards of work must be accepted by both parties. This provides a consistent platform for engaging contractors to perform the installation work and ensures that the installation of the subsea cable will be to the same required technical specifications within both UK and NL jurisdictions].</i> We therefore currently consider that transboundary impacts arising from construction of the Proposed Scheme alone would not be compounded by separate construction activities associated with the Dutch components of the wider Project. We are, however, continuing to consider how this assumption can be appropriately evidenced and secured.	
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	Preliminary assessment work has identified potential significant effects and mitigation measures, where required, to ensure compliance with the permits and authorisations applicable within each jurisdiction. This approach is predicated on the assumption that the necessary permits and authorisations are granted in both jurisdictions and that the applicable environmental standards and thresholds provide equivalent levels of environmental protection. Inspectorate response: The ES should describe any difficulties for example technical deficiencies or lack of knowledge encountered in compiling information, and the main uncertainties involved. Any uncertainty regarding the construction programme or method for the Dutch Offshore Scheme and Dutch Connection Scheme should be explained and accounted for in the assessment work. The Inspectorate advises that this should form part of the cumulative effects assessment (CEA) where the UK scheme and Dutch Offshore Scheme have potential to give rise to likely significant cumulative effects, taking into account any existing environmental problems. Similarly, if measures are proposed to	
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	avoid, prevent, reduce or offset significant adverse effects arising these should be described in the ES together with an explanation of the predicted effectiveness, and any monitoring proposed. This includes measures that are required to ensure compliance with other permits and authorisations. This should focus on measures proposed for the UK scheme but it should be clear what bearing, if any, identified uncertainties relating to the Dutch components have on finalising design of the measures proposed. Information should be provided in the ES about the dependencies of the project, and which specific methods and measures are intended to be 'matched' between the UK and Dutch components, ie what aspects of the project can and cannot be easily amended. Applicant proposed approach: Notwithstanding the above, we recognise the need to clearly identify and assess potential transboundary effects. Accordingly, the ES will be supported by a dedicated Transboundary Screening document which will identify the potential transboundary effects of the Proposed Scheme and take account of relevant information available from the parallel environmental assessment being undertaken by TenneT for the Dutch	
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	elements of the Project. Inspectorate response: The Inspectorate welcomes the proposal to submit a dedicated Transboundary Screening document, and to take account of relevant information from the parallel environmental assessment of the Dutch components, which may assist understanding of the baseline in potentially affected EEA states, including any existing environmental problems. Whilst not a statutory requirement, the Inspectorate would encourage the applicant to consult with relevant EEA states about any identified potential transboundary effects arising from the UK scheme and seek to address any identified issues prior to the DCO application being submitted. Any engagement undertaken should be recorded in the dedicated Transboundary Screening document that the applicant proposes to submit. The following EEA states responded to the Inspectorate's transboundary notification under Regulation 32 following scoping to confirm they wish to participate in the transboundary procedure: Belgium, Germany and the Netherlands. Applicant proposed approach:	
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	In addition, cumulative effects will be considered within the ES cumulative effects assessment. This will include consideration of the Dutch Connection Scheme associated with LionLink, i.e. the Nederwiek 3 development and associated transmission infrastructure, where relevant to understanding cumulative environmental effects. We are engaged with Tennet to obtain the environmental information that has been prepared for the Dutch Connection Scheme. Inspectorate response: For the avoidance of doubt, the Inspectorate would expect the Dutch Offshore Scheme to also be considered in the CEA as it is a reasonably foreseeable existing and/ or approved project. The Inspectorate's Advice on Cumulative Effects Assessment (CEA) (updated 12 August 2026) provides guidance including a suggested 4 stage approach to CEA. Stage 1 is identifying the long list of other existing and/ or approved development. It recommends that a zone of influence (Zol) is defined for each aspect, and certainty within 3 tiers assigned to the identified existing and/ or approved development. If the Dutch Offshore Scheme has been permitted, the Inspectorate would expect	
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	this to sit within Tier 1 where there is an increasing level of detail to support the Stage 4 assessment as relevant (ie where it is in the defined zone of influence for an aspect).	
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