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22 September 2026

Planning Inspectorate Reference: EN020033

Dear Secretary of State,

Request to Vary a Section 35 Direction dated 23 August 2022 (the Request)

National Grid Lion Link Limited (as the intended Applicant for LionLink), writes in relation to the direction which was issued by the Secretary of State for Energy Security and Net Zero (the "Secretary of State") to National Grid Interconnector Holdings Limited on 23 August 2022, pursuant to Section 35 of the Planning Act 2008 ("PA 2008"), in relation to LionLink, a new subsea electricity cable (known as an interconnector) enabling the flow of energy between the UK and the Netherlands, including a connection to a Dutch offshore wind farm ("LionLink"), formerly named 'EuroLink' (the "Section 35 Direction"). The Section 35 Direction confirmed that LionLink is to be treated as development for which development consent is required pursuant to the PA 2008.

The Section 35 Direction states that the: "Secretary of State considers that, when further details are available, and before submitting any application to The Planning Inspectorate, National Grid may wish to seek confirmation from the Secretary of State that LionLink and development that is the subject of the proposed application is the same as that for which the Direction is hereby given".

Before submission of the application for development consent to the Planning Inspectorate, which is currently programmed for April 2027, we write to request that the Secretary of State vary the Section 35 Direction for LionLink pursuant to section 233 and section 35 of the PA 2008.

This request is for a variation of the Section 35 Direction under section 233(2) of the PA 2008 which confers a power on the Secretary of State to vary a direction. This request constitutes a "qualifying request" in accordance with section 35ZA(11) of the PA 2008.

LionLink has had regard to the government's Planning Act 2008: Guidance on powers to direct a project into or out of the NSIP regime dated 3 July 2026 and has provided information including in respect of current government priorities, published policy statements, strategies or other documents that support the request and demonstrate the national significance of LionLink.

LionLink Project Updates

Regulatory Update

There are a number of project updates which have occurred since the issue of the Section 35 Direction (the “Original Request” - **Appendix 1**) and which are summarised below.

National Grid Lion Link Limited now has the benefit of an interconnector licence issued by the Office of Gas and Electricity Markets (“Ofgem”) pursuant to section 6A(5) of the Electricity Act 1989 on 12 July 2023 and will be the Applicant and the undertaker for the purposes of the development consent application for LionLink.

LionLink has also progressed from a regulatory perspective. In recognition of the benefit of offshore hybrid assets (“OHAs”) such as LionLink, a new regulatory and market framework is in the process of being established to ensure the delivery of OHAs. Ofgem has developed an OHA pilot scheme, where Ofgem has created a new regulatory and market framework to enable the construction of what Ofgem describes as an “essential new technology”.

LionLink is one of two pilot projects which are to be constructed and regulated under the cap and floor regulatory framework which Ofgem is developing. LionLink is the among the most mature interconnector project in this new regulatory and market framework, and the most mature OHA in the UK.

In its Decision on the Initial Project Assessment of the Offshore Hybrid Asset Pilot Projects dated 12 November 2024 (the “OHA IPA Approval”), Ofgem provided regulatory approval for LionLink for the pilot OHA regulatory regime. Following the OHA IPA Consultation, the OHA IPA Approval confirms that Ofgem had agreed in principle the cost and revenue sharing arrangements for LionLink.

This demonstrates increased regulatory certainty in respect of LionLink since the issue of the Section 35 Direction and highlights the national significance of LionLink.

Policy Update

From an international perspective, there are a number of international declarations which post-date the Section 35 Direction and which support the delivery of LionLink including The Ostend Declaration on the North Seas as Europe’s Green Power Plant dated 24 April 2023, The Hamburg Declaration from National to Regional: delivering on our joint vision of the North Seas as Europe’s Clean Power Hub Europe dated 26 January 2026 and The Hamburg Joint Declaration of Intent on the development of cooperation projects for an interconnected offshore renewable energy grid in the north seas dated 26 January 2026.

From a UK policy perspective, there are a number of policies which post-date the Section 35 Direction and which support the delivery of LionLink including The Clean Power 2030 Action Plan A new era of clean electricity – main report dated December 2024, The Clean Flexibility Roadmap dated July 2025, the government policy paper Next Steps for Electricity Interconnection in Great Britain dated March 2026 and the

updated national policy statements. The Clean Power 2030 Action Plan A new era of clean electricity – main report dated December 2024 (the “Clean Power Action Plan”) is an important energy policy document; it sets out a pathway to a clean power system, what government will do to support and accelerate delivery of the new infrastructure needed, and how the government will work as a government and with everyone involved to achieve the clean power system.

The Clean Power Action Plan expressly recognises the benefits of interconnectors and states that: “interconnectors can bring a wide range of system and consumer benefits. Electricity interconnectors support security of supply by enabling access to more diverse generation over a wider geographic area. They also provide system flexibility by helping the system rapidly respond to changes in supply and demand. This means that, when we generate more electricity than we need, a strong interconnector system will allow us to export the excess electricity, thus contributing towards the clean energy superpower role of the United Kingdom. Finally, interconnectors contribute to European-wide decarbonisation, as they can allow for more efficient use of intermittent renewables between connected countries”.

The Clean Power Action Plan provides clear support for interconnection and recognises the benefits of interconnection.

The Clean Flexibility Roadmap dated July 2025 (the “Roadmap”) is a policy paper which sets out the government’s vision for a clean, flexible and consumer-focused electricity system. The Roadmap was developed by the government along with Ofgem and NESO.

The Roadmap outlines a vision for a cleaner, more flexible electricity system, which maximises the use of energy infrastructure to minimise energy bills for consumers. The Roadmap recognises that flexibility is essential for integrating the new home grown, renewable power that Great Britain is building to reduce our reliance on expensive and volatile international fossil fuel markets. The Roadmap recognises that such flexibility is crucial for delivering the government’s Clean Energy Superpower Mission to achieve clean power by 2030 and net zero by 2050.

The Roadmap explicitly states that: “Government supports the development of OHAs”. LionLink, as an OHA, delivers on this government objective.

The Roadmap identifies: “the substantial increase in interconnection capacity needed to meet net zero, particularly after 2030”. LionLink will provide 2GW of interconnection capacity, clearly meeting this identified need.

The Roadmap further identifies that: “In the longer term, the government is supportive of additional interconnection and in bringing forward OHAs (especially MPIs [multi-purpose interconnectors] in GB), where future projects provide system benefits”. LionLink, as an OHA, delivers on this objective and LionLink has been determined by Ofgem as the energy regulator to deliver those system benefits.

The Clean Flexibility Roadmap Update dated July 2026 (the **Roadmap Update**) sets out an update on progress on the Roadmap. The Roadmap Update shifts focus from the

delivery of important but intermediate milestones to the longer-term outcomes that the government envisions for consumers and the wider electricity system and highlights the importance of interconnection post 2030.

The Roadmap Update identifies five outcomes of interconnection which contribute towards a range of system benefits. These benefits include diversifying our generation mix, enabling access to markets with potentially lower-cost electricity for GB consumers, supporting European decarbonisation, and increasing flexibility via import and export capability. A primary outcome is also identified as being the development of the healthy post-2030 pipeline of strategically aligned projects. LionLink is one such project, and will meet this need.

The Roadmap Update specifically identifies:

- the government's objectives to provide a rapid and reliable source of electricity flexibility to enhance the security of our energy supply, and increasing our cross-border collaboration on interconnection. The Roadmap Update specifically refers to the Hamburg Declaration, and the Government's is driving forward the development and shared financing of hybrid interconnection assets to help support these ambitions and decarbonise together with our European neighbours. LionLink will meet these objectives; and
- that a significant outcome of the government and Ofgem's work would be delivering the first multi-purpose interconnector (MPIs), in line with Hamburg commitment. The Hamburg Declaration contains specific European level support for LionLink.

The Roadmap further recognises that over 6GW of further projects have GB regulatory approval, with LionLink being one of those projects.

Therefore, the Project will aid the delivery of the objectives identified in the Roadmap and the Roadmap Update.

The government published its policy paper Next Steps for Electricity Interconnection in Great Britain (the "Policy Paper") in March 2026. The Policy Paper identifies three strategic objectives for the future of interconnection in Great Britain. These are:

- delivering new interconnectors and Offshore Hybrid Assets that are strategically aligned with a Net Zero energy system;
- strengthening cooperation with international partners to support the timely delivery of projects on the right terms; and
- ensuring the efficient operation of the interconnector fleet and supporting delivery of pipeline projects to ensure they provide the most value.

The Project delivers against each of these three strategic objectives.

Paragraph 3.3.4 to 3.3.7 of EN-1 recognise the need for interconnectors. These paragraphs provide as follows:

- Paragraph 3.3.4: *"There are several different types of electricity infrastructure that are needed to deliver our energy objectives. Additional generating plants,*

electricity storage, interconnectors and electricity networks all have a role, but none of them will enable us to meet these objectives in isolation”.

- Paragraph 3.3.5: *“New generating plants can deliver a low carbon and reliable system, but we need the increased flexibility provided by new storage and interconnectors (as well as consumer led flexibility, discussed below) to reduce costs in support of an affordable supply”.*
- Paragraph 3.3.6: *“Storage and interconnection can provide flexibility, meaning that less of the output of plant is wasted as it can either be stored or exported when there is excess production. They can also supply electricity when domestic demand is higher than generation, supporting security of supply. This means that the total amount of generating plant capacity required to meet peak demand is reduced, bringing significant system savings alongside consumer led flexibility (up to £12bn per year by 2050). Storage can also reduce the need for new network infrastructure. However, neither of these technologies, as with consumer led flexibility, are sufficient to meet the anticipated increase in total demand, and so cannot fully replace the need for new generating capacity”.*

Paragraph 3.3.32 of NPS EN-1 states that: *“Interconnection across national borders has an essential role in delivering a secure, low carbon electricity system at low cost”.*

These Paragraphs of EN-1 demonstrate that interconnectors are identified as having an essential role in delivering a low carbon electricity system.

Paragraph 3.2.8 of EN-1 provides that: *“The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent”.*

Paragraph 3.2.14 provides that *“Where the application is for electricity network infrastructure not covered by sections 15-21 of the Planning Act 2008, including underground or offshore infrastructure, the Secretary of State should give substantial weight to the need established at paragraphs 3.3.65 to 3.3.85 of this NPS”.*

Paragraph 4.2.19 of EN-1 further provides that: *“The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.8 to 3.2.10 of EN-1, is the starting point for all assessments of energy infrastructure applications”.*

Paragraph 3.3.65 of EN-1 provides that: *“There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives”.* Electricity network infrastructure is defined as including offshore transmission, which includes interconnectors and OHAs.

These Paragraphs of EN-1 demonstrate that from a planning policy position the need for the Project is established and that substantial weight should be applied to that need. In addition, whilst Paragraph 13 of the NPPF (August 2026) recognises that the NPPF does not contain specific policies for nationally significant infrastructure projects and

that these are determined in accordance with the decision-making framework in the Planning Act 2008 Policy W3.2 of the NPPF recognises the overall need for electricity network infrastructure (which includes interconnection infrastructure).

This demonstrates further policy support for LionLink since the issue of the Section 35 Direction and highlights the national significance of LionLink.

LionLink – Infrastructure Update

In addition to the above request, we wish to provide the Secretary of State with an update on the scope of the LionLink project and ask that the Secretary of State confirms in the requested response that these updates do not impact LionLink's status as development for which development consent is required.

When submitting the request for the Section 35 Direction, LionLink had an expected capacity of 1.8GW and the UK section of LionLink was expected to comprise the following key components:

1. Subsea electricity cables from the limits of the UK limits of the continental shelf to a landfall point at the mean high-water mark at the UK coast;
2. Underground HVDC electricity connection from a landfall point at the mean-low water mark at the UK coast to an onshore electricity converter station;
3. An onshore electricity converter station;
4. HVAC electricity connection from an onshore converter station to a substation in the vicinity of Leiston, Suffolk; and
5. A substation in the vicinity of Leiston, Suffolk.

LionLink continues to comprise this infrastructure and associated development.

At the time of submitting the request for a direction pursuant to Section 35 of PA 2008, the proposal was that LionLink would include consent for the full build out of a substation in the vicinity of Leiston, Suffolk, which is where LionLink would connect to the UK national grid, with the intention that this would be built out by National Grid Electricity Transmission plc ("NGET"). The substation had already been consented by Scottish Power Renewables ("SPR") in March 2021 (the "SPR consents"), however, there was of course no certainty that either of the SPR developments would be progressed, allowing the substation to be built out in time for LionLink to connect to the national grid.

Since the Section 35 Direction was issued, there is now greater certainty that the substation will be delivered by NGET pursuant to either of the SPR consents (or potentially, if consented, pursuant to the Sea Link project which NGET is currently promoting) in advance of LionLink commencing construction. On that basis, it is not considered necessary for the full substation to be re-consented as part of the LionLink development consent order. LionLink will instead seek to consent an extension to the substation, as already consented and on the basis that this will be built out prior to LionLink coming forward, in order to ensure that there will be sufficient capacity for LionLink's connection.

In addition, the built capacity of LionLink is now proposed to facilitate the export of up to 2GW of electricity to the Netherlands. For the avoidance of doubt, this would not change the physical scope of the infrastructure and there would still be an import capacity limit from the Netherlands to the UK of 1.8GW.

Reason for the Request

The Section 35 Direction states that the: “Secretary of State considers that, when further details are available, and before submitting any application to The Planning Inspectorate, National Grid may wish to seek confirmation from the Secretary of State that the Project and development that is the subject of the proposed application is the same as that for which the Direction is hereby given”.

As highlighted above, there have been changes to the infrastructure that will form part of the consent application for LionLink and a change to the export capacity of LionLink. Accordingly, the Applicant is seeking a variation so that the section 35 direction reflects the proposed project for which the application for development consent will be sought.

The reasons for requesting the Section 35 Direction remain valid and support the provision of the varied section 35 direction pursuant to the Request.

The Request

The Section 35 Direction states that the: “Secretary of State considers that, when further details are available, and before submitting any application to The Planning Inspectorate, National Grid may wish to seek confirmation from the Secretary of State that the Project and development that is the subject of the proposed application is the same as that for which the Direction is hereby given”.

We request that the Secretary of State provide a direction for the UK section of LionLink to be treated as development for which development consent is required pursuant to Section 35(1) of the PA 2008. We request that the direction issued by the Secretary of State confirms, pursuant to Sections 35ZA(3)(b) and 35ZA(5) of the PA 2008.

Qualifying Request

The Request is a qualifying request for the purposes of Section 35ZA(11) of the PA 2008.

For the purposes of Section 35 of the PA 2008, the primary components of the UK section of LionLink: forms part of a project (or proposed project) in the field of energy and so satisfies the condition in Section 35(2)(a); and will (when completed) be wholly in England (or waters adjacent to England up to the seaward limits of the territorial sea or the UK Renewable Energy Zone) and so satisfies the condition in Section 35(2)(b).

For the purposes of Section 35ZA(1) of the PA 2008, no application for a consent or authorisation mentioned in section 33(1) or (2) has been made in relation to the Development to which the Request relates. By virtue of Section 35(2)(c), the Secretary

of State must think that the project (or proposed project) is of national significance, either by itself or when considered with one or more other projects (or proposed projects) in the energy field. The following section sets out the national significance of the project and the other projects in the energy field to which it relates.

National Significance

For the reasons set out in the original request for the Section 35 Direction (the “Original Request”) appended at **Appendix 1** LionLink is of national significance. The policy updates and regulatory updates summarised above serve to underline the national significance of LionLink.

Draft Direction

A varied draft of the Section 35 Direction is included with this Request (**Appendix 2**). This shows the proposed variations to the Section 35 Direction to give effect to this Request.

Conclusion

LionLink:

- is of national significance, taking into account that it forms part of a high voltage direct current electricity link with capacity of up to 2GW between the national transmission systems of Great Britain and the Netherlands;
- will strengthen the UK’s national energy security, through the potential to supply up to 2GW of electricity which is enough to power approximately 2.5million homes; and
- will play an important role in enabling an energy system that meets the UK’s commitment to reduce carbon emissions and the Government’s objectives to create a secure and reliable energy supply for consumers.

By progressing the development through the PA 2008 development consent process, it would provide the certainty of a single, unified consenting process and fixed timescales. Therefore, we request that the Secretary of State varies the Section 35 Direction.

Yours sincerely,

REDACTED
LionLink Project Director

Appendix 1 – Section 35 Direction dated 23 August 2022

Appendix 2 – varied draft Section 35 Direction with tracked changes