

Date: 25th June 2024

East Suffolk Council – Lionlink Statement

On 21st May 2024, Suffolk County Council (SCC) and East Suffolk Council (ESC) submitted a joint letter to National Grid Ventures (NGV) regarding inadequacies within the recent Environmental Impact Assessment (EIA) Scoping consultation held for the proposed Lionlink Multi-Purpose Interconnector project¹. The joint letter was separate to ESC's engagement in the consultation process, and set out concerns regarding the adequacy, effectiveness, and the fairness, of the consultation held due to a lack of justification and rationale regarding the preferred landfall site options being taken forwards by the project.

The joint letter raised concern that due to the absence of sufficient evidence being presented at the time of the EIA Scoping consultation in support of NGV's preferred landfall site options, that this breached the established case law on the 'Gunning Principles' relating to the laws of consultation. This meant that there was insufficient information presented at the time of the consultation to allow 'intelligent consideration' of preferred landfall options and their alternatives. The joint letter therefore concluded that sufficient evidence had not being made available as part of the consultation materials, resulting in supporting evidence not being readily accessible to consultees, and not being easily interpretable for consultees to provide an informed response. Therefore, NGV's justification supporting the refinement of their preferred landfall options was lacking detail, hence it was found to breach the Gunning Principles.

Notwithstanding ESC's overarching position on the project, ESC has always sought co-ordination between projects so that should the projects be consented in the locations proposed, the amount of onshore infrastructure required within our district is minimised, together with any unnecessary disruption on local communities and the environment through the sharing of assets and other related works. The National Grid Electricity Transmission (NGET) Sealink network reinforcement project linking Suffolk with Kent, being 12-18 months ahead of Lionlink, has shortlisted Aldeburgh as the preferred sub-sea cable landfall location within East Suffolk which is being taken forwards into the Development Consent Order (DCO) examination phase (scheduled for Q1 2025). Therefore, given the absence of sufficient evidence being provided by the Lionlink project in support of the preferred landfall options, notably dismissing the Aldeburgh landfall option, SCC and ESC remain concerned that the required level of assessment for alternative landfall options has not been fully explored by NGV.

The Aldeburgh landfall option could enable Sealink and LionLink to significantly reduce the amount of disruption through the use of shared infrastructure and cable trenches and being the shortest onshore cable route to the proposed Saxmundham converter station sites. The removal of the Aldeburgh landfall option at this early stage would result in no possibility for landfall site and underground cable installation co-ordination with the Sealink project. The dismissal of this landfall location without sufficient evidence is not acceptable.

NGV provided a written response to SCC and ESC on 30th May 2024²

ESC is aware of escalating concerns within local communities as to ESC's perceived preference for the Lionlink project's preferred landfall location. ESC is aware that Suffolk Energy Action Solutions (SEAS) raised concerns

LEGAL ADDRESS East Suffolk House, Station Road, Melton, Woodbridge IP12 1RT

¹ https://www.eastsuffolk.gov.uk/planning/national-infrastructure-and-energy-projects/lionlink/

² https://www.eastsuffolk.gov.uk/planning/national-infrastructure-and-energy-projects/lionlink/

that the joint letter indicates ESC's preference for Aldeburgh over other landfall site options. However, ESC's preference has been well publicised for more than a year now. ESC would prefer a strategic plan for our energy coast, an integrated offshore network with brownfield landfalls. However, as projects progress in the current model we have an absolute duty to ensure proper (Gunning) principles are honoured.

ESC's approach to the SeaLink and LionLink projects has not fundamentally changed, and we continue to push for greater coordination across all projects within our district. We encourage the Applicants to fully explore all opportunities to do so, including offshore connection options where viable. However, as project options get refined by Applicants and they progress towards DCO Examination, ESC must continue to work with the Applicants and remain agile in our approach to achieve the best possible outcomes for our local communities.

Yours faithfully

Councillor Tom Daly - Aldeburgh & Leiston Ward Cabinet Member for Energy & Climate Change East Suffolk Council