

XLINKS' MOROCCO-UK POWER PROJECT

Consultation Report

**Annex J: Regard had to statutory consultation responses
Appendices J-1 to J-5**

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XLINKS' MOROCCO – UK POWER PROJECT

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GLOSSARY

Term	Meaning
Alverdiscott Substation	The existing National Grid Electricity Transmission substation at Alverdiscott, Devon, which comprises 400 kV and 132 kV electrical substation equipment.
Alverdiscott Substation Connection Development	The development required at the existing Alverdiscott Substation Site, which is envisaged to include development of a new 400 kV substation, and other extension modification works to be carried out by National Grid Electricity Transmission. This does not form part of the Proposed Development, however, it is considered cumulatively within the Environmental Impact Assessment as it is necessary to facilitate connection to the national grid.
Alverdiscott Substation site	The National Grid Electricity Transmission site within which the Alverdiscott Substation sits.
Applicant	Xlinks 1 Limited.
Bipole	A Bipole system is an electrical transmission system that comprises two Direct Current conductors of opposite polarity (one conductor with positive voltage and one with negative voltage).
Biodiversity Net Gain	An approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity, developers are encouraged to provide an increase in appropriate natural habitat and ecological features over and above that being affected to ensure that the current loss of biodiversity through development will be halted and ecological networks can be restored.
Climate change	A change in global or regional climate patterns, in particular a change apparent from the mid to late 20th century onwards and attributed largely to the increased levels of atmospheric carbon dioxide produced by the use of fossil fuels.
Construction Traffic Management Plan	A document detailing the construction traffic routes for heavy goods vehicles and personnel travel, protocols for delivery of Abnormal Indivisible Loads to site, measures for road cleaning and sustainable site travel measures.
Converter Site	The Converter Site is proposed to be located to the immediate west of the existing Alverdiscott Substation site in north Devon. The Converter Site would contain two converter stations (known as Bipole 1 and Bipole 2) and associated infrastructure, buildings and landscaping.
Converter station	Part of an electrical transmission and distribution system. Converter stations convert electricity from Direct Current to Alternating Current, or vice versa.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
Earthworks	Covers the processes of soil-stripping, ground-levelling, excavation, and landscaping, as defined by the Institute of Air Quality Management.

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Environmental Impact Assessment	The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project, through comparison with the existing and projected future baseline conditions.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
Horizontal Directional Drilling	Horizontal Directional Drilling (HDD) is a method of installing underground pipelines, cables and service conduit (or ducts) through trenchless methods to avoid obstacles and sensitive features (e.g. roads, watercourses, woodlands, etc.). The term HDD is used here interchangeably with other similar trenchless techniques but excluding micro tunnelling or direct pipe methods.
HVAC Cables	The High Voltage Alternating Current cables which would bring electricity from the converter stations to the new Alverdiscott Substation Connection Development.
HVAC Cable Corridors	The proposed corridors (for each Bipole) within which the onshore High Voltage Alternating Current cables would be routed between the Converter Site and the Alverdiscott Substation Site.
HVDC Cables	The High Voltage Direct Current cables which would bring electricity to the UK converter stations from the Moroccan converter stations.
Landfall	The proposed area in which the offshore cables make landfall in the United Kingdom (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Cornborough Range, Devon, between Mean Low Water Springs and the transition joint bays inclusive of all construction works, including the offshore and onshore cable routes, and Landfall compound(s).
Marine Conservation Zone(s)	Marine Conservation Zone(s) are marine nature reserves and are areas that protect a range of nationally important, rare or threatened habitats and species.
Maximum design scenario	The realistic worst case scenario, selected on a topic-specific and impact specific basis, from a range of potential parameters for the Proposed Development.
Mean High Water Springs	The height of mean high water during spring tides in a year.
Mean Low Water Springs	The height of mean low water during spring tides in a year.
National Grid Electricity System Operator	National Grid Electricity System Operator operates the national electricity transmission network across Great Britain. National Grid Electricity System Operator does not distribute electricity to individual premises, but its role in the wholesale market is vital to ensure a reliable, secure and quality supply to all.
National Grid Electricity Transmission	National Grid Electricity Transmission owns and maintains the electricity transmission network in England and Wales.

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National Policy Statement(s)	The current national policy statements published by the Department for Energy Security and Net Zero in 2023 and adopted in 2024.
Offshore Cable Corridor	The proposed corridor within which the offshore cables are proposed to be located, which is situated within the UK Exclusive Economic Zone.
Onshore Infrastructure Area	The proposed infrastructure area within the Order Limits landward of Mean High Water Springs. The Onshore Infrastructure Area comprises the transition joint bays, onshore HVDC Cables, converter stations, HVAC Cables, highways improvements, utility diversions and associated temporary and permanent infrastructure including temporary compound areas and permanent accesses.
Onshore HVDC Cable Corridor	The proposed corridor within which the onshore High Voltage Direct Current Cables would be located.
Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.
Preliminary Environmental Information Report	A report that provides preliminary environmental information in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is information that enables consultees to understand the likely significant environmental effects of a project, and which helps to inform consultation responses.
Proposed Development	The element of Xlinks' Morocco-UK Power Project within the UK. The Proposed Development covers all works required to construct and operate the offshore cables (from the UK Exclusive Economic Zone to Landfall), Landfall, onshore Direct Current and Alternating Current cables, converter stations, and highways improvements.
Order Limits	The area within which all offshore and onshore components of the Proposed Development are proposed to be located, including areas required on a temporary basis during construction (such as construction compounds).
Special Areas of Conservation	A site designation specified in the Conservation of Habitats and Species Regulations 2017. Each site is designated for one or more of the habitats and species listed in the Regulations. The legislation requires a management plan to be prepared and implemented for each Special Area of Conservation to ensure the favourable conservation status of the habitats or species for which it was designated. In combination with Special Protection Areas and Ramsar sites, these sites contribute to the national site network.
Special Protection Areas	A site designation specified in the Conservation of Habitats and Species Regulations 2017, classified for rare and vulnerable birds, and for regularly occurring migratory species. Special Protection Areas contribute to the national site network.
The national grid	The network of power transmission lines which connect substations and power stations across Great Britain to points of demand. The network ensures that electricity can be transmitted across the country to meet power demands.
Transition joint bay	A transition joint bay is an underground structure at the landfall area where the offshore cables are jointed to the onshore cables.

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Exclusive Economic Zone	An area of the sea, which is under territorial ownership of a single state.
Utility Diversions	Works required by statutory utility providers to re-route infrastructure around the Proposed Development.
Xlinks' Morocco-UK Power Project	The overall scheme from Morocco to the national grid, including all onshore and offshore elements of the transmission network and the generation site in Morocco (referred to as the 'Project').

ACRONYMS

Acronym	Meaning
AC	Alternating Current
AOD	Above Ordnance Datum
AONB	Area of Outstanding Natural Beauty
CBRA	Cable Burial Risk Assessment
CEMP	Construction Environment Management Plan
CLV	Cable laying vessel
COLREG	International Regulations for the Prevention of Collisions at Sea
CTMP	Construction Traffic Management Plan
DC	Direct Current
Defra	Department for Environment, Food & Rural Affairs
EEZ	Exclusive Economic Zone
EIA	Environmental Impact Assessment
ES	Environmental Statement
FOC	Fibre optic cables
FTE	Full Time Equivalent
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
INNS	Invasive non-native species
LAT	Lowest Astronomical Tide
LEMP	Landscape and Ecology Management Plan
MARPOL	International Convention for the Prevention of Pollution from Ships
MCA	Maritime and Coastguard Agency

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MFE	Mass flow excavation
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
MPCP	Marine Pollution Contingency Plan
NESO	National Energy System Operator
NGET	National Grid Electricity Transmission
OCC	Offshore Cable Corridor
OHL	Overhead Lines
OOS	Out of Service
OSPAR	Convention for the Protection of the Marine Environment of the North-East Atlantic
PAD	Protocol for Archaeological Discoveries
PLONOR	Pose Little Or No Risk
ROV	Remotely operated vehicle
SOLAS	International Convention for the Safety of Life at Sea
SOPEP	Shipboard Oil Pollution Emergency Plan
SSS	Side Scan Sonar
SSSI	Site of Special Scientific Interest
UK	United Kingdom
UXO	Unexploded Ordnance
VMP	Vessel Management Plan

UNITS

Units	Meaning
m	Metre
m ²	Square metre
m ³	Cubic metre
mm	Millimetre
kV	Kilovolt
GW	Gigawatt
ha	Hectares
km	Kilometre
km ²	Square kilometre

APPENDIX J-1: REGARD HAD TO STATUTORY CONSULTATION RESPONSES FROM CONSULTEES UNDER S42(1)(A)

Table J-1.1 below sets out responses to the statutory consultation from consultees under s42(1)(a) of PA 2008 concerning offshore elements of the Proposed Development and the regard had to them by the Applicant. It should be read in conjunction with Section 7.2 of the Consultation Report (Document Ref: 5.1).

Table J.1.1 - Offshore: Summary of Section 42(1)(a) responses and regard had by topic

Topic	Summary of comments	Body	Response	Design change (Y/N)
Assessment methodology				
Offshore methodology	It is difficult to discern the specific methodology of the offshore activities, such as the cable laying and burial depth, installation of cable protection, and excavation of trenchworks. A detailed methodology and timeline of the proposed development activities must be included within the Environmental Statement (“ES”) in order to enable a full and robust assessment of impacts. The MMO appreciates that it may not be possible to provide specific details, such as the cable burial depth for the whole length of the OCC, however an accurate range of values, including maximums and worst-case scenarios, should be provided.	MMO	<p>Volume 1, Chapter 3: Project Description of the Environmental Statement (hereafter – “the ES”) (Document Ref: 6.1.3) has been updated, and presents a description of all potential offshore activities.</p> <p>As acknowledged in the MMO’s comment it is difficult to confirm with certainty the precise offshore cable burial methods (at all locations) until local conditions are encountered during construction, and thus a range of methods are presented. To predict likely methods that will be employed and thus inform impact considerations, an Outline Cable Burial Risk Assessment (CBRA) presented in Volume 1, Appendix 3.4 of the ES (Document Ref: 6.1.3.4) has been undertaken.</p> <p>The ES includes spatial analysis of the CBRA data, presenting figures showing burial risk associated with different installation types (which may be interpreted as the inverse of likely installation methods i.e. where there is low burial risk to trench plough this means that full depth burial should be easily achieved using this method).</p> <p>The burial risk analysis has been integrated with the detailed habitat data collected within the Offshore Cable Corridor, such that a quantitative assessment of risk from different</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
			installation types is presented in Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1), and specifically in Volume 3, Appendix 1.2: Benthic Habitat Disturbance Calculations of the ES (Document Ref: 6.3.1.2). Worst case scenarios, in terms of e.g. disturbance footprint associated with construction activities, or volume of disturbed sediments etc, are considered throughout the offshore environmental statement assessments.	
Offshore and onshore distinction	A clear division between the onshore and offshore elements of the proposed development is also required in the ES.	MMO	The ES presents the onshore assessments as Volume 2 and the offshore assessments as Volume 3. Chapters such as the Project Description (Volume 1, Chapter 3 of the ES) where combined, are set out where relevant, with discrete onshore and offshore sections.	N
NRA Assessment	The MCA is content with the assessment undertaken within the Navigation Risk Assessment (NRA) which summarises the navigational features, historical incident data, vessel activity including anchoring and fishing activity, and other navigational data available, and how the phases of the project are managed to a point where risk is reduced and considered to be 'as low as reasonably practicable' (ALARP).	MCA	This is noted. An updated Navigational Risk Assessment (NRA) has been included with the Development Consent Order (DCO) application (Volume 3, Appendix 5.1 of the ES (Document Ref: 6.3.5.1))	N
Assessment scope	Comment that Natural England's remit extends out to 12nm in English waters.	Natural England	This is noted. The offshore assessments cover relevant inshore and offshore waters. EIA and European Site assessment consultations have been carried out with Natural England and/or JNCC where appropriate. The Applicant appreciates the effective communications between all SNCBs which has made relevant site responsibilities clear throughout submission preparations.	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
MCZ Assessment	Natural England advises that the Applicant conducts an MCZ Assessment, as the majority of the marine protected sites likely impacted by this development are MCZs.	Natural England	<p>A preliminary Marine Control Zone (MCZ) assessment was submitted for Natural England review on 30 July 2024. A final MCZ assessment forms part of the application for DCO (Document Ref: 7.15).</p> <p>The Applicant met with representatives of both Natural England and the Joint Nature Conservation Council (JNCC) on 30 October 2024 to present a summary of the key MCZ assessment findings.</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Cumulative effect	<p>Limiting the impact over the long term is imperative, therefore coordination and mitigation amongst different projects is vital. The route to landfall could potentially be impacted frequently over a number of years, this should be avoided.</p> <p>Natural England recommend the applicant coordinates with Celtic Sea HNDFUE who are working towards a holistic network design for The Crown Estate's Round 5 Celtic Sea Offshore Wind leasing round. Additionally, future proofing construction methods could include ducts built into the landfall works to avoid more disturbance should future projects connect at this location.</p>	Natural England	<p>Consultations have been undertaken with the developers of the proposed White Cross Offshore Wind Farm (to confirm the location of cable corridors and to understand the potential for cumulative effects).</p> <p>It is noted that the Round 5 The Crown Estate (TCE) developers are not in place at this time. Following specific consultations with TCE the Offshore Cable Corridor (OCC) has been expanded to the east where it passes TCE PDA3 area, to allow maximum separation distance from any future assets that may be developed as part of PDA3.</p> <p>The latest information released from the National Energy System Operator (NESO) in relation to the holistic consideration of Celtic Sea Round 5 leasing developments (Beyond 2030: Celtic Sea, August 2024) suggests potential Devon landfall (in principle) however there is little further clarity at this stage on preferred landfall location. It is known that a separate connection location to the National Grid would be required, which means limited potential for coordination of cable corridors (even if project timescales were better aligned). At this time there are no schemes that would benefit from the Project's landfall and there is no Cost Benefit Analysis case to justify installing additional HDD ducts at the landfall.</p> <p>To the extent that PDA3 information is available, it is included in the cumulative assessments for the offshore disciplines.</p>	N
Guidance	<p>Natural England and JNCC have produced joint environmental best practice advice for subsea cable projects in English inshore and UK offshore waters and it is the expectation that developers follow our Best Practice through the application and consenting process.</p>	Natural England	<p>The Natural England and JNCC joint environmental best practice advice for subsea cable projects in English inshore and UK offshore waters has been considered in the preparation of the ES.</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Legibility	The legends of Figure 2-5 in the HRA are hard to read and could do with clarifying.	Natural England	The figures presented in the HRA Report to Inform Appropriate Assessment (RIAA) (Document Ref: 7.16) have been updated to be clearer. ES Figures are presented as standalone figures in separate Volumes. Embedded figures within Appendices, and Other Documents are inserted as full page pdf figures (generally A3) for clarity.	N
Benthic ecology				
Methodology	We agree with the screening criteria methodology used for benthic features. No offshore benthic sites were identified as part of this stage 1 screening assessment.	JNCC	This is noted.	N
Cable protection measures	The MMO recommends the ES includes consideration of the use of local rock material where cable protection measures are required, to encourage colonisation of a more natural benthic assemblage and potentially minimise the impact of cable removal at the decommissioning phase. Should the cable not attain the correct burial depth in an area of coarse sediment, the material used to provide cable protection should be in keeping and typical of the surrounding habitat.	MMO	The source of the rock that will be used for cable protection is currently unknown and will not be finalised until award of principal contractor etc i.e. post application for DCO. The source is highly probable to be either basaltic or granitic in origin i.e. relatively 'inert'. It is unlikely to be feasible to deploy variable rock along the course of the OCC, not least because of transit distances and reactive, adaptive rock placement at the time of construction. Although a sensible aspiration to adjust materials dependent on surrounding substrates, there are no large-scale cable installation projects (to the Applicant's knowledge) that have undertaken such an approach. The likelihood of requiring rock placement is greatest in hard bedrock areas (given associated constraints to burial) where rock placement would be most 'in keeping' with surrounding habitats.	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Micrositing	The MMO welcomes the commitment to micrositing around Annex I habitat within the OCC.	MMO	Noted. Proposed Development commitment OFF03 (Volume 3, Appendix 3.1: Commitments Register of the ES (Document Ref: 6.1.3.1)) confirms this commitment.	N
General	Natural England largely agrees with the conclusions made considering benthic features. However, Natural England request clarification in some areas in the form of further assessments/plans, figures and adjustments to the classification of some impacts.	Natural England	<p>The Applicant met with Natural England on 12 August 2024 to provide clarification on elements of the benthic assessment as part of a project update and review of PEIR comments. The results of the CBRA methods risk analysis versus benthic habitats within the Offshore Cable Corridor have been added to the assessment at ES stage.</p> <p>The results of the project-specific intertidal survey have been added to the baseline section of Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1) and are referred to within the assessment section.</p> <p>The updated results of the HRA (RIAA) and the final MCZ assessment are reflected in the final benthic ES chapter.</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Mitigation hierarchy</p>	<p>Natural England advises Mitigation hierarchy should always be followed; Avoid, Reduce, Mitigate.</p> <p>Natural England advises that routes which have greater confidence of cables remaining buried and removes the requirement for external cable protection should be chosen.</p> <p>Also, the recoverability of habitats needs to be considered. Impacts to MPAs should be avoided, if this is not possible then consideration should be given to cable installation within habitats which have a greater likelihood of recoverability (i.e. mobile habitats) and/or the use of novel installation tools/methods to lessen the impacts.</p> <p>Additionally, infrastructure and cable crossings should be located outside MPAs/Features/Sensitive habitats and to reduce the need for external cable protection.</p>	<p>Natural England</p>	<p>Avoidance of protected habitats has been the first mitigation step taken i.e. adhering to the Mitigation hierarchy. The site selection and route optimisation process, is summarised within Volume 1, Chapter 4: Need and Alternatives, of the ES (Document Ref: 6.1.4). The route optimisation studies included consideration of environmental constraints such as Marine Protected Areas (MPAs) including Special Areas of Conservation (SAC), Special Protection Areas (SPA), and Marine Conservation Zones (MCZ). The only MPA that the Offshore Cable Corridor passes through is the Bristol Channel Approaches SAC, which is unavoidable for any approach to the North Devon coast (or the wider South West).</p> <p>Existing asset Crossing ID84 is situated within the Bristol Channel Approaches SAC. All other crossings are located outside of MPAs. The specific location of ID84 was discussed with Natural England during the meeting of 12 August 2024. Natural England concurred that this specific crossing is located on a low risk benthic habitat type.</p> <p>Consideration has been given to applying approaches to the proposed development to reduce effects as far as possible and apply mitigation measures as appropriate. Potential effects on the Bristol Channel Approaches SAC, which is designated for Harbour Porpoise, have been assessed as part of the ES and the Report to Inform Appropriate Assessment. Effects on habitats, and consideration of recoverability forms part of Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1). The Applicant met with Natural England and the JNCC on 30 October 2024 to provide an update on impacts to the Bristol Channel Approaches SAC as informed by the HRA RIAA (Document Ref: 7.16).</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Mitigation measures</p>	<p>From the project description it appears rock protection may be required for up to 150km of cable route. Although any associated rock protection would not overlap with any benthic protected features, given the large extent Natural England advises consideration (but not exclusively) is given to the following to inform potential mitigation measures:</p> <p>Adoption of the reburial hierarchy, with external cable protection being last resort.</p> <p>Undertake a cable burial risk assessment pre-consent, focussing on areas directly adjacent to MPA boundaries where cables are likely to be suboptimally buried. This will allow for a realistic worse-case scenarios of impacts within MPAs to be transparently considered (i.e. changes to physical processes).</p> <p>Installation of cable protection with the minimal footprint where technically feasible e.g. pinning. Where appropriate (noting the sensitivity of some bird features) use of guard vessels and/or advance mapping to avoid sub-optimally buried/ surface laid cables negating the need for physical cable protection.</p> <p>Where external protection cannot be avoided within subtidal sediment habitats, use of cable protection with the greatest likelihood of removal e.g. rock bags. In addition, detonation of UXOs outside of designated sites to avoid the creation of craters.</p>	<p>Natural England</p>	<p>The Applicant is committed to attempt cable reburial as a first option in suitable habitats before consideration of use of external cable protection to reduce the amount of external cable protection used. This is consistent with Natural England's environmental best practice guidance (Natural England 2022).</p> <p>A Cable Burial Risk Assessment has been undertaken and an outline of the CBRA (Volume 1, Appendix 3.4 of the ES; Document Ref: 6.1.3.4) presents details of this assessment, including a spatial analysis of likely installation methods, including those in proximity to protected sites.</p> <p>Final micro-routing will allow identification of the most optimum route which will involve minimising rock placement where possible - whilst also working to avoid sensitive habitats, archaeological exclusion zones etc.</p> <p>Given the spatial extent of rock protection required, rock bags are impractical, with loose rock placement the intended method.</p> <p>Unexploded ordnance (UXO) licensing will be undertaken as a separate marine licence application, as per the MMO's preferred approach.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Cable burial risk assessment</p>	<p>Natural England notes that there is no cable burial risk assessment provided, nor a map showing where cable protection is required. Natural England would like to see a cable burial risk assessment as well as a map showing where cable protection is required, identified to a feature level (i.e. 10m x 10m subtidal sand) in Application, with consideration for NERC habitats.</p>	<p>Natural England</p>	<p>An Outline Cable Burial Risk Assessment is presented in Volume 1, Appendix 3.4 of the ES (Document Ref: 6.1.3.4). A series of CBRA related maps and associated potential habitat disturbance calculations (interaction between different construction methods and habitats) are also presented within the ES. Note, the precise tools used at any one location cannot be guaranteed until installation conditions are confirmed by the cable contractor, however the risk assessments provide a good indication of the likely tools to be used. The maps include indicative (and worst case) rock placement locations, including presentation relative to benthic habitats and designated sites.</p> <p>Requirements for cable burial have been discussed with Natural England during ongoing meetings with marine representatives.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Boulder clearance</p>	<p>Natural England agrees with the principles of the method used for assigning significance, sensitivity and magnitude of impact. However, it is not clear whether all relevant pathways of effect to MPAs have been considered.</p> <p>Para 1.4.24 acknowledges the limitations of the current assessment in the absence of more detailed seabed preparation requirements, but it is not clear from the information provided whether, due to the proximity of the cable corridor, seabed preparation/boulder clearance could be required within the boundaries of the South West Approaches to Bristol Channel MCZ.</p> <p>Natural England advises that if boulder clearance is potential required, then the magnitude of impacts should be increased. We acknowledge that the overlap is likely to be small and ultimately still insignificant in EIA terms. However, this should still be considered and documented within the EIA and MCZ assessment.</p>	<p>Natural England</p>	<p>Within the stretch of the cable corridor that runs directly adjacent to the South West Approaches to Bristol Channel MCZ, the Outline Cable Burial Risk Assessment in Volume 1, Appendix 3.4 of the ES (Document Ref: 6.1.3.4) has indicated that the seabed in this area is composed of low density boulders and as such only minimal boulder clearance is anticipated to be required in these areas. As the cable corridor does not cross into the MCZ itself and any boulder clearance adjacent to the MCZ would be limited in extent (and wholly contained within the Offshore Cable Corridor), there is not considered to be any risk of an impact pathway to the South West Approaches to Bristol Channel MCZ from boulder clearance activities (c.f. Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1), and the Marine Conservation Zone Assessment (Document Ref: 7.15). Following discussions with Natural England and JNCC the Proposed Development has made the following commitment (please see Volume 1, Appendix 3.1: Commitments Register of the ES (Document Ref: 6.1.3.1) (Document Ref: 6.1.3.1)):</p> <p style="text-align: center;"><i>All construction activities undertaken on the seabed including boulder clearance activities (inclusive of the depositing of moved boulders) will remain entirely within the Offshore Cable Corridor, and a minimum distance of 20 m from any Marine Conservation Zone boundary.</i></p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
MPAs	Natural England advises that it is not clear whether secondary impacts to MPAs, such as smothering, have been appropriately characterised and considered. This is particularly relevant for the reef features with the East of Haig Fras MCZ, which are more sensitive to sediment deposition. This pressures also needs to be included in the MCZ assessment. This assessment should be revisited once more detailed information is available to enable the worst case scenario of impacts within the MCZs to be robustly characterised and assessed (e.g. using plume and depositional modelling).	Natural England	Potential for smothering of habitats/species has been considered in the updated ES (Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1)), the HRA (Report to Inform Appropriate Assessment, Document Ref: 7.16) and MCZ assessment (Document Ref: 7.15). These final assessments have incorporated the outputs of final sediment transport studies (c.f. Volume 3, Appendix 8.1 Sediment Source Concentrations and Assessment of Disturbance of the ES; Document Ref: 6.3.8.1) and MarESA sensitivity where appropriate (which are detailed in e.g. Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1)).	N
Monitoring of MCZs	Natural England advises that until the likely impacts within MCZs are fully understood, it is unable to advise on the requirements for future monitoring.	Natural England	<p>Comment is noted. A preliminary MCZ assessment was provided to Natural England, JNCC and MMO on 30 July 2024. A final MCZ assessment forms part of the application for DCO (Document Ref 7.15).</p> <p>The Applicant met with Natural England and the JNCC on 30 October 2024 to respond to comments on the preliminary MCZ assessment and present the findings of the final MCZ assessment.</p>	N
UXO clearance	Natural England agrees with UXO clearance being scoped out in terms of benthic impacts, so long as all clearance activities remain outside of MPA boundaries and an appropriate buffer is applied for SOCI within MPAs.	Natural England	The UXO licensing is separate to the ES and the application for DCO. This is reiterated in the final ES(e.g. Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1)).	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Management Plan	Natural England agrees with the measurements listed in Paragraph 1.8.120 regarding bentonite breakout or spillage, but would like clarification that a management plan will be put in place which includes the measures outlined in this paragraph.	Natural England	An outline Bentonite Breakout Plan (Document 7.20) is submitted as part of the DCO application, which sets out the framework and principles to mitigate any break out. A pre-construction Bentonite Breakout Plan will be prepared by the HDD contractor post consent in accordance with the requirements of the outline.	N
Frac-out	Natural England advises a management plan is created for “frac-out” risks.	Natural England	An outline Bentonite Breakout Plan (Document 7.20) is submitted as part of the DCO application, which sets out the framework and principles to mitigate any break out. A pre-construction Bentonite Breakout Plan will be prepared by the HDD contractor post consent in accordance with the requirements of the outline.	N
Biotope mapping	Natural England welcomes the proposed biotope mapping around the landfall area but would advise surveys are amended to allow for wider considerations. A biotope map of the landfall area should include an appropriate buffer suitable to encompass all ancillary activity (vehicle activity, storage etc.) within the sublittoral, littoral and supralittoral zone.	Natural England	An intertidal survey has been completed and the findings presented in Volume 3, Appendix 1.1 of the ES (Document Ref: 6.3.1.1). There are no proposed ancillary activities (vehicle activity, storage etc.) within the intertidal zone. The HDD will be physically separated from the intertidal zone (HDD ducts will be c.20 m below seabed level) and the (marine) exit points will be located between approximately 5 m permanent water depth and 10 m permanent water depth (approx. 500 m to 1800 m offshore). There will not be any works or storage of materials between the exit points and the foreshore. The intertidal habitats have been surveyed in case of unforeseen risk of a bentonite breakout in the intertidal zone. Available information for subtidal habitats is considered to be sufficient to inform assessment of the sublittoral zone.	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>External cable protection</p>	<p>Natural England advises that further consideration should be given to the type of external cable protection to be used, other than rock placement, which can be more readily removed without further damage to the marine environment; such as mattresses, rock bags and innovative methods of protection.</p>	<p>Natural England</p>	<p>Cable protection types and methods are set out in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3). Crossing design (crossing of existing in-service cables) will adhere to industry standards, including International Cable Protection Committee (ICPC) recommendations.</p> <p>The Outline Cable Burial Risk Assessment in Volume 3, Appendix 3.4 of the ES (Document Ref: 6.1.3.4) provides indications / best estimates of where cable protection will be required, however burial by backfill will be prioritised wherever possible to minimise the introduction of materials and any associated local effects. Cable protection in the form of rock placement allows the necessary flexibility during installation e.g. allows for precise placement of rock within trench or placement of small amounts of rock to supplement partial burial in other areas.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Cable crossings</p>	<p>Natural England notes that where possible out of service cables will be cut prior to cable installation, which is Natural England's preference to prevent the need for mandatory external cable protection at crossings.</p> <p>There are 28 out of service crossings and 21 active cables, therefore worst-case scenario is 49 cables crossings with potentially 3,500m² per crossing (171,500m²).</p> <p>Further clarity on the proposed 3500m² is required. For example, does it include crossings at both bundled cables or is this footprint of external cable protection at the crossing for each bundled cable (i.e. the total quantity should be doubled?).</p> <p>A quantitative analysis of the number of crossings and the location of these crossings can be used to calculate the expected external cable protection required for the project, as well as the footprint of habitat loss at these crossing sites. This data needs to be included in the evaluation process for environmental impact.</p> <p>This would be additional to external cable protection required along the route of the cables, as part of installation activities, as well as operation and maintenance activities.</p>	<p>Natural England</p>	<p>The number of Out of Service (OOS) cables has been amended to 27 since PEIR stage (reduced from 28). As noted at PEIR, sections of OOS cables will be removed where possible, which is consistent with Natural England's preference i.e. prevents the need for mandatory external cable protection at these OOS crossings. Liaison with the asset owners for the OOS cables is underway, with the expectation that agreements for cable removal will be in place pre-installation. As a worst case, it is assumed that x5 of the OOS cables will require crossings (5 OOS cables x 2 bipoles = 10 OOS cable crossing protection structures in total). Should any OOS cable crossings be required, this will be confirmed to the MMO (and Natural England) post consent, prior to construction.</p> <p>For clarity there are x20 active or planned cables that require crossing protection - 18 crossings of active fibre optic cables (15 cables but three are crossed twice), one crossing of a fibre optic cable where installation is currently under way and one crossing of a planned power cable. (Thus, 20 in-service assets x 2 bipoles = 40 in-service asset crossing protection structures in total.)</p> <p>Grand total asset crossing protections structures (across both bipoles) = 50. Precautionary dimensions for these crossings were presented at PEIR stage (3500 m² per crossing).</p> <p>The ES presents the location of planned and OOS crossings in the Offshore Crossing Schedule in Volume 1, Appendix 3.3 of the ES (Document Ref 6.1.3.3), including a visual comparison against habitat biotopes (e.g. Volume 3, Figure 1.14 of the ES). A further quantitative assessment of indicative habitat disturbance (to biotope level) is provided across all planned crossings.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Supporting habitats</p>	<p>Natural England advises that consideration is needed in relation to potential habitat changes/loss from cable installation and placement of cable protection on supporting habitats for Marine Mammals and Annex I birds.</p> <p>Natural England advises that further consideration is needed on potential impacts on changes to benthic habitats and marine processes on prey availability and foraging ability of Marine Mammal and Annex I birds.</p>	<p>Natural England</p>	<p>The role of benthic habitats as supporting habitats for marine mammals and Annex I birds are considered in more detail (relative to the PEIR) in Volume 3 Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1) and Volume 3 Chapter 4: Marine Mammals & Turtles of the ES (Document Ref 6.3.4). Conservation Objective 3 for the Bristol Channel Approaches SAC 'The condition of supporting habitats and processes, and the availability of prey for harbour porpoise is maintained' has been considered in the HRA (RIAA: Document Ref: 7.16) and is included in the Benthic Ecology and Marine Mammal PEIR Chapters (as above).</p>	<p>N</p>
<p>Construction</p>				
<p>Methodology</p>	<p>The draft outline Construction Environmental Management Plan (OCEMP) lacks detail as methods and processes have yet to be finalised. Details on how risks to coastal waters will be managed should be provided within the Outline Offshore Construction Environmental Management Plan (OOCEMP).</p>	<p>Environment Agency</p>	<p>The outline offshore CEMP (Document Ref: 7.9) has been updated to refer to how risks to coastal waters will be managed.</p> <p>Detail on specific construction methods and processes is not included in the outline offshore CEMP as this information is not yet known and will be dependent on the chosen contractor. This information will however be included within the Pre-Construction Offshore CEMP to be produced post consent by the chosen contractor prior to construction starting.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Cable protection	The PEIR includes the use of concrete mattresses as a cable protection method. Often mattresses have some form of plastic included within their design e.g. for handle fronds. The ES should include details of such plastics and consider the risks of placing plastic infrastructure into the marine environment should they degrade. A construction method statement for the placement of cable protection should be included in the Outline Offshore CEMP.	MMO	<p>Pre-cast concrete mattresses may include small quantities of integrated plastic. These plastic components may be used as handles / fixing points and are standard design features for concrete mattresses used in the marine environment. The type of plastic will be suitably robust and resistant to deterioration i.e. appropriate for long-term deployment (50+ years minimum) in the marine environment. Mattresses will be covered with rock protection or sediments, which will further reduce potential for deterioration. The potential for associated risks to water quality are considered (and scoped out) within the ES (Volume 3, Chapter 8: Physical Processes of the ES (Document Ref: 6.3.8).</p> <p>Detailed construction methods will be provided in the Pre-Construction Offshore CEMP produced by the construction contractor; an outline offshore CEMP (Document Ref: 7.9) is provided at application for DCO.</p>	N
HDD Operations	Should HDD operations require the use of continuous concrete pours, the potential for and impact of aborted cement should be detailed within the ES and Outline Offshore CEMP. This is to ensure that no waste concrete slurry or wash water from concrete is discharged into the marine environment. Concrete and cement mixing and washing areas must be 10 m away from any watercourse or surface water drain to minimise the risk of run off entering a watercourse.	MMO	There will be no requirement for any wet concrete pours associated with the landfall HDD or any of the offshore works.	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
HDD Operations	With regards to minimising the potential impacts of HDD activities, a tertiary mitigation measure provided within the PEIR is the use of bentonite to seal fractures and monitor pressure loss, to allow for the rapid identification of potential break outs. Impacts regarding punch out and loss of drilling fluids and cuttings have been minimised by the approach to the construction in that the boreholes are drilled to their full diameter prior to breakthrough to minimise the drilling fluid loss and lowering the flow rate of the fluid during the breakthrough. The impacts of this should be considered within the ES.	MMO	Thorough impact assessment of the HDD works and activities is contained in the ES, including e.g. Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1). An Outline Bentonite Breakout Plan (Document Ref 7.20) as part of the DCO application. A Pre-construction Bentonite Breakout Plan will be prepared by the HDD contractor based on the Outline Bentonite Breakout Plan.	N
Assessments	A Bentonite Breakout Plan should also be included within the Outline Onshore CEMP. This should include an assessment of the likelihood of the risk and impact on the marine environment of worst-case scenarios from breakout, stuck drill strings, loss of cement or drill fluid, etc, to the Bristol Channel and/or the River Torridge as a result of the proposed development.	MMO	An Outline Bentonite Breakout Plan is provided with the application for DCO as document reference 7.20. This breakout plan will be finalised by the HDD contractor. For info, the ES also now includes results of an intertidal habitats and species survey which is used to characterise an assessment of intertidal species sensitivity (within Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1).	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Cable material storage	The MMO understands that the offshore cables will be jointed to the onshore cables at two TJBs. Paragraph 3.7.149 of the PEIR states that 1,875 cubic metres (“m3”) (50m x 15m x 2.5m) of material is to be removed at each of the two TJBs. No description of how the material will be stored or disposed of is provided (including any details of storage or disposal locations, and if stored then how long this will be for). In addition, if the material is disposed of, details on how the TJBs will be filled is also not provided. This information must be included in the ES.	MMO	The Applicant apologises for the confusion that may have been caused. The Transition Joint Bays (JTBs) referred to in this instance are sited onshore. No material is removed from the marine environment. The location on the seabed where the HDD ducts emerge will only be scraped clear so that the HVDC cables can be fed through and sealed.	N
HDD Operations	Furthermore, paragraph 3.8.22 of the PEIR states that sediment will be removed from an area of approximately 15m x 15m around each of the four HDD exit points. The maximum volume of sediment to be removed is not provided. This must be specified in the ES. As with the material to be removed at the two TJBs, the method of disposal has not been provided. The MMO notes, and welcomes, the intention to engage directly with the MMO with regards to dredge and disposal options.	MMO	The offshore HDD pit construction methods have been refined at ES stage (Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3). There will be no removal of cleared / dredged materials (no trailing suction hopper dredger as indicated at PEIR stage). Exit pits will be cleared of surface sediments (sands) by long-reach excavator from HDD jack-up barge or Mass Flow Excavator (MFE), with pits filled following cable installation through a combination of long-reach excavator and natural infilling (Bideford Bay is an area of active surface sediment movement).	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>HDD Operations</p>	<p>Paragraph 3.8.21 of the PEIR states that drilling fluids that are on the OSPAR list that Pose Little Or No Risk (“PLONOR”) to the environment would be used. However, to be able to fully understand the risk to the marine environment, the ES should include details of the use and volume of the chemicals to be used in the HDD, including information regarding their components and their potential for persistence toxicity and bioaccumulation.</p>	<p>MMO</p>	<p>Bentonite (a preferred “PLONOR” substance) is confirmed as the HDD drill fluid. Bentonite is a standard drilling fluid used across the UK for similar HDD operations. The Applicant can provide the MMO material safety data information if deemed necessary.</p> <p>An Outline Bentonite Breakout Plan (Document Ref 7.20) is provided with the application for DCO. A Pre-Construction Bentonite Breakout Plan will be prepared by the HDD contractor based on the Outline Bentonite Breakout Plan which will provide further detail on the use of bentonite as a drilling fluid. Volume 3, Chapter 8: Physical Processes of the ES (Document Ref: 6.3.8) presents assessment of water quality change during punch out of the HDD at exit pits.</p>	<p>N</p>
<p>Sandwave levelling</p>	<p>The pre-lay cable installation preparation methods (covered at paragraph 3.8.33 of the PEIR) state that there will be “clearance of debris and some local seabed features e.g., boulders and sand waves; and construction of crossing structures over existing in-service cables”. However, the following paragraph states that “the preparations will not remove materials from the local area i.e. there will be no dredge arisings or similar. Any seabed preparations will be limited to immediate clearance/flattening only” (paragraph 3.8.34). Please note that the clearance of sand waves is considered as dredging within the 2009 Act. As such, this activity should be referred to, and treated as, dredging within the ES.</p>	<p>MMO</p>	<p>Following detailed review of environmental survey data, the Outline Cable Burial Risk Assessment in Volume 1, Appendix 3.4 of the ES (Document Ref: 6.1.3.4) now confirms that there is no requirement for broadscale sandwave levelling. In other words there is no 'pre-sweeping' required in UK waters and all anticipated sandwaves are small enough to enable e.g. conventional jetting to bury below the non-mobile reference layer.</p> <p>Indicative burial methods figures (risk to relevant burial methods) are now provided in the ES (Volume 1 figures) and also in the context of benthic habitats (see figures in Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1)).</p> <p>Noted regarding the definition of sandwave clearance as dredging within the 2009 Act.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Sandwave levelling</p>	<p>The ES must include the locations of each specific site within the OCC that may require sand wave levelling. Dredge methodology, volume and impacts should also be provided within the ES. Furthermore, sediment sampling and analysis may be needed at these locations in order to characterise the material at these sites. See comments 10.1 to 10.5 of this document for further details.</p>	<p>MMO</p>	<p>Following detailed review of environmental survey data, the Outline Cable Burial Risk Assessment in Volume 1, Appendix 3.4 of the ES (Document Ref: 6.1.3.4) now confirms that there is no requirement for broadscale sandwave levelling. In other words there is no 'pre-sweeping' required in UK waters and all anticipated sandwaves are small enough to enable e.g. conventional jetting to bury below the non-mobile reference layer.</p> <p>Indicative burial methods figures (risk to relevant burial methods) are now provided in the ES (Volume 1 figures) and also in the context of benthic habitats (see figures for Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1).</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Seabed disturbance</p>	<p>Paragraph 3.12.7 of the PEIR states that “localised dredging (or other seabed clearance) may be required for seabed preparation at the HDD exit points...A Dredging Management Plan will be developed to limit the seabed disturbance and suspended sediment concentrations and control the generation of sediment plumes”.</p> <p>Further clarification is required with regards to ‘or other seabed clearance’ to ensure it also includes limiting the seabed disturbance, suspended sediment concentrations and generation of sediment plumes as a result of the clearance of sand waves.</p>	<p>MMO</p>	<p>HDD exit pit construction methods have been refined at ES stage (c.f. Volume 1, Chapter 3: Project Description of the ES). There will be no removal of cleared / dredged materials (no TSHD as indicated at PEIR stage). Exit pits will be cleared of surface sediments (sands) by long-reach excavator from HDD jack-up barge or MFE, with pits filled following cable installation through a combination of long-reach excavator and natural infilling (Bideford Bay is an area of active surface sediment movement).</p> <p>Note also the project commitment for all potential sediment disturbance activities in Bideford Bay to avoid peak spring tides and significant wave activity - to limit any potential for sediment mobilisation.</p> <p>Following detailed review of environmental survey data, the Outline Cable Burial Risk Assessment in Volume 1, Appendix 3.4 of the ES (Document Ref: 6.1.3.4) now confirms that there is no requirement for broadscale sandwave levelling. In other words, there is no 'pre-sweeping' required in UK waters and all anticipated sandwaves are small enough to enable e.g. conventional jetting to bury below the non-mobile reference layer. Potential for suspended sediment generation and associated impacts are assessed within Volume 3, Chapter 8: Physical Processes of the ES (Document Ref: 6.3.8) (and the associated chapter appendices).</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>HDD exit pit construction</p>	<p>Paragraph 3.12.9 of the PEIR states that, where it is not possible to beneficially re-use the material dredged at the HDD exit points, alternative disposal options in line with regulatory and consenting requirements for disposal of dredged material will be adhered to, adding that the PEIR considers the dredging activity only. The ES must include full details of any disposal, with sediment analysis used to support any decisions made. See comments 10.1 to 10.5 for further details.</p>	<p>MMO</p>	<p>HDD exit pit construction methods have been refined at ES stage – please see Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3). There will be no removal of cleared / dredged materials (no TSHD as indicated at PEIR stage). Exit pits will be cleared of surface sediments (sands) by long-reach excavator from HDD jack-up barge or using MFE, with pits filled following cable installation through a combination of long-reach excavator and natural infilling (Bideford Bay is an area of active surface sediment movement). No specific chemical sampling planned.</p>	<p>N</p>
<p>Water depth reduction</p>	<p>The applicant is reminded that any cable protection must not exceed a maximum 5% reduction in surrounding depth referenced to chart datum, unless otherwise agreed with the MCA. We note the commitment that relevant policy guidance on water depth reduction will be followed during the design and construction of the project. Preliminary findings suggest that no areas are at risk of reducing water depth by more than the MCA stipulated 5%.</p>	<p>MCA</p>	<p>Reduction in under keel clearance is considered within the impact assessment in Volume 3, Chapter 5: Shipping & Navigation of the ES (Document Ref: 6.3.5), with a conclusion that there is not anticipated to be any locations where the reduction in water depth would be >5%. Proposed Development commitment OFF22 (please see Volume 1, Appendix 3.1: Commitments Register of the ES (Document Ref: 6.1.3.1) states:</p> <p><i>Relevant policy guidance on water depth reduction has been followed during the design of the project. During final engineering design and construction, should any areas be identified where cable protection is required and the Maritime and Coastguard Agency (MCA) condition of no more than 5% reduction in water depth is not achievable as far as reasonably practicable, a location specific review of impacts to shipping and consultations with the MCA will be carried out to agree additional mitigations as required.</i></p> <p>Note, as above, there is no expectation of water depth reductions of greater than 5% - all crossing locations have been reviewed relative to water depth and these will constitute <5% water depth in all locations.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Water depth reduction</p>	<p>Should external protection reduce water depth by more than 5% in any area, this will require consultation with the MCA and further detailed assessment may be required in order to assess the subsea cables protection against shipping and fishing activities (anchoring and trawling) and to ensure navigational safety is not compromised. The MCA welcomes the development and review of the Cable Burial Risk Assessment (CBRA) which will inform detailed understanding of the burial details along the Offshore Cable Corridor in the Environmental Statement.</p>	<p>MCA</p>	<p>There is no expectation of water depth reductions of greater than 5% - all crossing locations have been reviewed relative to water depth, and these will constitute <5% water depth in all locations.</p> <p>An Outline Cable Burial Risk Assessment is presented in Volume 1, Appendix 3.4 of the ES (Document Ref: 6.1.3.4). Mapping of construction and protection details are provided as figures alongside Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p> <p>Proposed Development commitment OFF22 (please see Volume 1, Appendix 3.1: Commitments Register of the ES (Document Ref: 6.1.3.1)) states:</p> <p><i>Relevant policy guidance on water depth reduction has been followed during the design of the project. During final engineering design and construction, should any areas be identified where cable protection is required and the Maritime and Coastguard Agency (MCA) condition of no more than 5% reduction in water depth is not achievable as far as reasonably practicable, a location specific review of impacts to shipping and consultations with the MCA will be carried out to agree additional mitigations as required.</i></p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Cable protection	The MCA would expect a post lay cable burial survey to be carried out to confirm where the target depths have or have not been met. Any locations where the cable remains as either surface laid or shallow buried should be reassessed, considering the traffic levels and types of vessel activity in that area as further risk mitigation may be required, such as an anchor penetration study. This should be discussed further once the final installation techniques have been identified, with relevant stakeholders including local ports and harbours and the MCA.	MCA	The cable will be buried or fully protected for the entire UK Offshore Cable Corridor length. Post-lay cable burial surveys are anticipated, as noted in e.g. Volume 3, Chapter 5: Shipping & Navigation of the ES (Document Ref: 6.3.5). Within 4 weeks of the completion of the construction phase, and the laying of any new cable protection following the completion of construction, the Applicant will confirm to the MMO, the MCA and UKHO, the details and location of new cable protection, confirming the final clearance depths over the protected cables where the new cable protection has been laid. As laid data will also be shared with the MOD i.e. the Defence Infrastructure Organisation.	N
Shipping and navigation assessments	Vessel movements associated with construction activities may lead to temporary reduction of access or disruption to pilotage, particularly if project vessels are using one of the local harbours. HDD works in particular have potential to lead to disruption given these may involve large jack-up vessels which are RAM status in nearshore areas. Therefore, liaison with local pilots, ports and harbours should be undertaken to limit disruption to access. We note the Vessel Management Plan will be developed which will set out pre-agreed vessel routes, speeds, safety measures, communication expectations etc, which we welcome.	MCA	Consultation with the pilot for the Taw and Torridge District was carried out during preparation of the Shipping and Navigation ES assessments (c.f. Volume 3, Chapter 5: Shipping & Navigation of the ES (Document Ref: 6.3.5)). An Outline Navigational Safety and Vessel Management Plan is presented as Volume 3, Appendix 5.2 to the ES (Document Ref: 6.3.5.2).	N
Cable Burial Risk Assessment	The MMO notes the intention to produce a detailed Cable Burial Risk Assessment ("CBRA"). The MMO supports this and will provide comments on this when available.	MMO	An Outline Cable Burial Risk Assessment is presented as Volume 1, Appendix 3.4 of the ES (Document Ref: 6.1.3.4).	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Consultation				
Consultation	<p>Trinity House welcome the continued engagement and the meeting held on 10th June 2024.</p> <p>Trinity House require continued engagement with the project and have particular concerns over areas where the navigable depth of water will be reduced by more than 5% as per the MCA guidelines.</p> <p>In order to assess any impact on Trinity House aids to navigation in the vicinity of the project could we please be provided with relevant shape files showing the cable corridor.</p> <p>We would also like to be sent the Navigational Risk Assessment when it is produced.</p>	Trinity House	<p>Proposed Development commitment OFF22 (please see Volume 1, Appendix 3.1: Commitments Register of the ES (Document Ref: 6.1.3.1)) states:</p> <p><i>Relevant policy guidance on water depth reduction has been followed during the design of the project. During final engineering design and construction, should any areas be identified where cable protection is required and the Maritime and Coastguard Agency (MCA) condition of no more than 5% reduction in water depth is not achievable as far as reasonably practicable, a location specific review of impacts to shipping and consultations with the MCA will be carried out to agree additional mitigations as required.</i></p> <p>Note, there is no expectation of water depth reductions of greater than 5% - all crossing locations have been reviewed relative to water depth, and these will constitute <5% water depth in all locations.</p> <p>The Navigational Risk Assessment in Volume 3, Appendix 5.1 of the ES (Document Ref: 6.3.5.1) will be provided to Trinity House following submission of the application.</p>	N
MCZ Assessment	<p>We note that the applicant plans to submit a project MCZ Assessment report and we would welcome the opportunity for early consultation of this report.</p>	JNCC	<p>A preliminary MCZ Assessment was issued to JNCC for comment on 30 July 2024, with comments received incorporated into the final MCZ Assessment (Document Ref: 7.15) submitted alongside the DCO application.</p> <p>A consultation meeting was held on the 30 October 2024 with Natural England and the JNCC to present the approach to addressing comments on the MCZ Screening report, and findings of the final MCZ Assessment.</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Consultation	After discussion with our colleagues at NE and JNCC, we will be deferring to them on this case, as the project is within English waters and they are content to provide advice in relation to the Bristol Channel Approaches SAC.	Natural Resources Wales	This comment is noted.	N
Consultation	We note the proximity of the cable corridor to the seaweed farm off the coast at Bideford. We would recommend liaison with the seaweed farm operators to ensure minimal disruption and to limit any potential impact on the mooring arrangements.	MCA	<p>Algapelago, the owners of the aquaculture site, have been contacted as part of the consultation undertaken on the Proposed Development.</p> <p>The Applicant did not receive a consultation response from the organisation. The impact of the Proposed Development upon the Aquaculture site has been discussed in Volume 3, Chapter 6: Other Marine Users of the ES (Document Ref: 6.3.6).</p> <p>Algapelago recently (August 2024) received permission (under marine licence) to trial a shellfish cultivation pilot to establish the commercial feasibility of shellfish cultivation at their existing site in Bideford Bay. This pilot is assessed throughout the offshore ES chapters within the Cumulative Effects Assessment.</p>	N
Fish and shellfish ecology				
Sandeels	The MMO is minded to agree that, due to the size of the sandeel spawning ground in relation to the much smaller zone of impact from the OCC works, impacts to sandeel at a population level are not considered likely. However, the assessment for potential impacts to suitable sandeel spawning habitat is relatively high level. At ES stage, the characterisation of sandeel habitat and the impact assessment could be	MMO	The ES has included the suggested data sources where possible. Sandeel spawning and nursery grounds overlap with the Proposed Development's Fish and Shellfish Study Area – utilising data from e.g. Coull et al., 1998 and Ellis et al., 2012. Sandeel have very specific habitat requirements for medium to coarse sand with little mud and gravel content (Wright et al., 2000; Holland et al., 2005). To further characterise the likely presence of sandeel and the value of the habitats along the Offshore Cable Corridor for sandeel	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
	<p>improved with the inclusion of the following additional data sources:</p> <ul style="list-style-type: none"> • Seabed sediment data from CEFAS' OneBenthic open science portal • British Geological Survey ("BGS") seabed sediment data • Alternatively, a more robust assessment could be provided using the MarineSpace updated sandeel habitat assessment methodology (Reach et al., 2023) • Whilst presenting a MarineSpace 2023 'heatmap' of sandeel habitat is not essential for the ES, it would provide a more robust assessment. 		<p>spawning and nursery, potential sandeel habitats were mapped using site specific PSA data and BGS sediment data. The methodology followed that detailed in Latto et al. (2013), to identify areas of preferred, marginal and unsuitable habitat for sand eel.</p> <p>Site specific PSA data collected along the Offshore Cable Corridor were mostly classified as sand to gravelly sand (Folk classification) and therefore assigned as preferred habitat for sandeels (Volume 3, Figure 2.7 of the ES). Preferred sandeel habitat was found at 60.4% of sample points, with 10.4% of sample points being assigned as marginal and 29.2% being assigned as unsuitable. Additionally, the BGS sediment data indicates that sandeel preferred habitat is widespread across the Study Area and adjacent areas.</p> <p>It is understood that the MarineSpace 2023 'heatmap' utilises vessel monitoring system data, which is inappropriate for inferring sandeel presence. (VMS data only differentiates between fishing locations by gear types. As one gear type will target a number of species and not just sandeel, the probability of it informing sandeel presence is very low.)</p> <p>Considering their stationary life stages, sandeel are deemed to be of high vulnerability, high recoverability (mobile adults will quickly recolonise the area) and are of national value. They have been assessed as medium sensitivity within the ES. Given the extensive habitat availability across the Study Area the potential loss of habitat along the Offshore Cable Corridor will be small in the context of the wider area which they utilise. Potential sandeel impacts are determined within the ES (Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES (Document Ref: 6.3.2)) to be insignificant in EIA terms.</p>	

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Allis shad	<p>The MMO notes that a recent study by West Country Rivers Trust has identified the presence of gravid female allis shad in the river Taw. Although this alone does not provide robust evidence to suggest the presence of a new known spawning ground for the species (currently the Tamar is the only known spawning ground), it does indicate that the river is important for allis shad and spawning there is possible, however, more research and funding is needed for confirmation (Baycock, 2023). Please refer to the website link (https://wrt.org.uk/female-allis-shad-confirmed-in-river-taw/) for more information and contact West Country Rivers Trust for access to the report. This information may be useful in the ES in relation to assessments for allis shad.</p>	MMO	<p>An information request was submitted to the West Country Rivers Trust, with access to the report being granted. Information from the report (Baycock, 2023) regarding allis shad in the river Taw has been included within the baseline environment in section 2.7 of Volume 3 Chapter 2: Fish and Shellfish Ecology of the ES (Document Ref: 6.3.2), and considered within the assessment in sections 2.10, 2.11 and 2.12 of the same chapter.</p>	N

<p>Fish and shellfish</p>	<p>The PEIR notes that berried European lobster (<i>Homarus gammarus</i>), crawfish (<i>Palinurus elephas</i>), and brown crab (<i>Cancer pagurus</i>) may be negatively impacted by suspended sediments and identifies a medium tolerance to this impact. These species are particularly vulnerable to habitat loss and physical impacts when females are berried. Whilst these species have been assessed as having low sensitivity to the impacts caused by the proposed project overall, they do have increased sensitivity to females when berried. To reduce impacts, it is recommended that the construction works be timed to limit periods when females are berried. For brown crabs (<i>Cancer pagurus</i>) in the North Sea, females are typically berried from late autumn to early spring. Critical habitats should be avoided, and construction activities should be timed to minimize disruption during sensitive periods such as breeding or larval settlement. The MMO would expect to see these mitigation measures considered in the ES.</p>	<p>MMO</p>	<p>In the Celtic Sea and English Channel, brown crab overwintering is believed to occur between October and June, with the majority of individuals overwintering between November and early June, and some individuals stopping as early as late March (Hunter et al., 2013). Construction activities over peak winter months will be limited, with the period largely avoided – the provisional schedule excludes December to February inclusive for most activities except for rock placement (which needs to follow earlier trenching works in sequence). The area effected by temporary habitat loss is small in the context of available over-wintering grounds in the wider area. Therefore, population level effects are unlikely to occur (as described in Volume 3, Chapter 2: Fish and Shellfish of the ES (Document Ref: 6.3.2)).</p> <p>Crawfish and lobster can be 'berried' throughout the year. However, unlike brown crabs 'berried' females are unlikely to occur on soft sediment and are likely to show a preference for rocky habitat types (particularly areas with Annex I reef status which are likely to contain numerous crevices and fissures). Potential impacts are described Volume 3, Chapter 2: Fish and Shellfish of the ES (Document Ref: 6.3.2). Micro-routing of the cable will be implemented to minimise damage to Annex I reef habitats which also serves to minimise any potential for impacts on berried crawfish and lobster.</p> <p>The Applicant presented and discussed these points with the MMO and Cefas (as technical advisors to the MMO) in November 2024, i.e. the latest indicative schedule of construction activities which includes some winter activities, and the latest potential impact assessment on brown crab, European lobster, and crawfish. Cefas agreed with the assessment of temporary habitat loss being small in the context of available over-wintering grounds in the wider area. Subject to confirmation, which is now provided within the ES,</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
			that rock placement activities (which is the principal activity scheduled to occur during winter months) are transient at any one location (days rather than months), then Cefas agreed that potential impacts on berried shellfish would not be significant.	
Fish	Natural England does not have any specific comments to raise surrounding fish at the current time.	Natural England	Noted.	N
Cumulative effects (HRA comment)	With respect to impacts on fish, Natural England advises that Hinkley Point C has its DCO and should be included in the list of projects for cumulative environmental assessment.	Natural England	Hinkley Point C has been added to the other projects considered in the cumulative effects assessment for fish and shellfish ecology in Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES (Document Ref: 6.3.2) and is specifically discussed in the HRA Report to Inform Appropriate Assessment (Document Ref: 7.16).	N
Fisheries				
Fisheries liaison	The MMO recommends early engagement with the National Federation of Fishermen's Organisations ("NFFO") and local harbour authorities, including the early appointment of a Fisheries Liaison Officer.	MMO	<p>A Fisheries Liaison Officer (FLO) has been appointed by the Project since the early survey data collection phase.</p> <p>Local harbour authorities have been engaged. Consultations undertaken with Bideford Harbour Master, who also represents Taw and Torridge pilots and is Competent Harbour Authority for Taw and Torridge Estuary.</p> <p>Consultations with Lundy Island also carried out. NFFO contacted (awaiting response at time of drafting).</p> <p>Details of commercial fisheries consultations are provided in Volume 3, Chapter 3: Commercial Fisheries of the ES (Document Ref: 6.3.3).</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Fisheries data	The PEIR includes an array of datasets to help inform the assessment for commercial fisheries. These include the UK annual fisheries landing statistics, the UK Vessel Monitoring System (“VMS”) data, fishing vessel route density data, the MMO Fishing vessel surveillance sightings, as well as key species stock assessments and management plans.	MMO	Noted. No response required.	N

<p>Inshore fleet</p>	<p>In the applicant's ES assessment, under the 'Description of fishing fleets active in the study area' section, the MMO recommends having a separate discussion specifically for the inshore/small-scale fleet (<10 m), as this sector is often more vulnerable to the effects of displacement, particularly if static gear fishers are displaced into areas typically fished by mobile gears resulting in gear conflicts. Furthermore, the sector is often marginalised when compared to large-scale and industrial fisheries, because much of the fisheries spatial and temporal data (VMS, automatic identification system ("AIS") tracking data) that is used to monitor and represent the spatial and temporal behaviours of these sectors is under used and under studied for smaller and inshore fleets, leaving them disproportionately under-represented (Chuenpagdee et al., 2012; Metcalfe et al., 2017). Additionally, for vessels of 10 m and under, there is no statutory requirement for fishermen to declare their catches, although spatial and temporal information on their landings is generated from the sales notes and MMO officers' local knowledge of the fishery (Galparsoro et al., 2024). Although, it should be noted that as of January this year this process is being replaced by the CatchApp data. This can result in the operational range of small-scale fishers being under-estimated, leading to fishers being displaced from important fishing grounds (Birchenough et al., 2021; Behivoke et al., 2021). These limitations must be discussed in the applicant's ES assessment.</p>	<p>MMO</p>	<p>Volume 3, Chapter 3: Commercial Fisheries of the ES (Document Ref: 6.3.3) has been updated to reflect this comment. The under 10m, inshore fleet are referenced appropriately and have been fully considered within the impact assessment.</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
Netting fleet	The MMO notes that in paragraph 3.5.15 of Chapter 3 it is stated under the UK Netting description that the “UK beam trawl landings have an annual value of £3 million”. It must be clarified if this statistic is for beam trawls or netting vessels.	MMO	Volume 3, Chapter 3: Commercial Fisheries of the ES (Document Ref: 6.3.3) has been updated to confirm netting fleet.	N
Geology, hydrology and ground conditions				
Geomorphology	<p>Principles to follow regarding watercourse crossings / coastal landfall to avoid negative impacts on geomorphology and natural processes: Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change.</p> <p>Ensure coastal landfall infrastructure is located outside of areas expected to be impacted by coastal change over the duration of the project.</p> <p>Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be exposed by future coastal erosion or river movement. Consider opportunities to deliver WFD mitigation measures as part of the design. Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables to surface level in floodplains earmarked for future river restoration. BNG guidelines indicate that structures built within 10 m of the bank top of a watercourse qualify as encroachment, which may</p>	Environment Agency	<p>Volume 3, Chapter 3: Hydrology and Flood Risk (Document Ref: 6.2.3) provides discussion on the potential for impacts on watercourse crossings and consideration of the WFD (as applicable). The Applicant would engage with the lead local flood authority where required prior to any works affecting watercourses. The Applicant confirms that the placement and depth of landfall infrastructure has considered the potential impacts of climate change in the siting of the landfall. The Applicant confirms that there are no proposed structures within 10m of the bank top of a watercourse.</p> <p>Volume 3, Chapter 8: Physical Processes of the ES (Document Ref: 6.3.8) provides discussion on the potential for impacts on geomorphology and natural processes at the landfall. The use of HDD effectively isolates the Proposed Development from the coastal cliffs, the beach and the intertidal area. Following a review of the Shoreline Management Plan Review (SMP2), it is understood that in the baseline scenario the cliffs (and rocky shore platform) are geologically resistant to erosion which occurs very slowly (NDASCAG, 2010). The SMP2 also states that ‘Cliff recession and instability of the cliff face brought about by weathering, is generally slow and provides a limited supply of coarse sediment’. The landfall infrastructure (landward side) is set well back from the coastline and cliffs, and well back</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
	<p>affect the uplift score calculated using the BNG Watercourse metric.</p>		<p>from the predicted SMP2 future scenario predictions (associated with relevant timescales).</p> <p>Relative to the design life of the Proposed Development, no impacts to the rocky shore platform at (and around) the location of the proposed landfall, such as down wearing, damage and coastal retreat, are expected. Within the inshore area (water depths <10m) the proposed cable will not impact metocean conditions since it is installed beneath the seabed using HDD. Therefore, no change to wave height, period and direction are anticipated. The baseline weathering and erosion regime occurs very slowly along this stretch of shoreline and no change resulting from the Proposed Development is anticipated.</p>	
<p>Decommissioning impacts</p>	<p>The current proposal to leave the landfall ducting in place at decommissioning may result in the infrastructure becoming exposed in the future due to natural processes.</p> <p>Impact</p> <p>Unsightly exposed ducting that may interfere with natural coastal processes.</p> <p>Solution</p> <p>Include a commitment that, prior to decommissioning, available technologies are reviewed and the possibility of removal of ducting and backfill of drill lines is assessed.</p> <p>Local geology, intended drilling depth and water depth of breakout may be sufficient to mitigate this possible impact.</p>	<p>Environment Agency</p>	<p>Refer to Volume 3, Chapter 8: Physical Processes of the ES (Document Ref: 6.3.8) for discussion on likelihood of landfall ducting being exposed following decommissioning and likely impacts. In short, the shallowest potential exit pit location is located at -5m Lowest Astronomical Tide (LAT) seabed level. Ducts will be below the level of the seabed with up to c.5m of unconsolidated sediments characteristic of the HDD exit area. Thus, ducting will be in the region of c.8-10m below extreme low water, and covered with bed sediments. Furthermore, predicted sea level change in this region is for sea level rise.</p> <p>In any event, technologies at the time of decommissioning would be reviewed and separate EIA (or similar) carried out in preparation of any decommissioning works and associated separate marine licensing.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Clarity	<p>Lack of detailed maps to show the part of the study area that intercepts with WFD waterbodies</p> <p>Impact</p> <p>Lack of clarity</p> <p>Solution</p> <p>Include Figures at a more localised scale to show the proposed landfall location, cable route, and the results of benthic surveys in relation to the WFD waterbodies</p>	Environment Agency	<p>Figures have been updated within the Offshore Water Framework Directive (WFD) Assessment (Document Ref: 7.14) to show waterbodies at a more localised scale and to present the results of the benthic surveys in relation to WFD waterbodies.</p>	N
Marine archaeology and heritage				
Updated assessments	<p>We acknowledge that this proposal – within the UK - represents a complex scheme which encompasses both marine and terrestrial elements and multiple different heritage environments. However, due to there being clear gaps in the data and analysis that has been included at the time of consultation, this has resulted in limiting the detailed advice we can provide at this stage</p>	Historic England	<p>The PEIR by its nature could only present preliminary findings as part of the overall Environmental Impact Assessment process. The marine archaeology assessment has been updated since the PEIR and the updated assessment and findings presented in Volume 3 Chapter 7: Marine Archaeology of the ES (Document Ref: 6.3.7).</p> <p>Several chapters, including Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7), include updated assessments of many areas of study.</p> <p>Several direct consultations have been undertaken with Historic England since the preparation of the PEIR, allowing a collaborative development of the ES and the associated archaeological assessments such as the Outline Offshore Archaeological Written Scheme of Investigation, which is presented as Volume 3, Appendix 7.5 of the ES (Document Ref: 6.3.7.5).</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Consultation	However, prior to our PEIR response a Stage 1 and 2 Marine Geoarchaeological Assessment and an Archaeological assessment of marine geophysical data have been submitted for our review. Therefore, we will respond to the approach and content of these documents in due course.	Historic England	Noted. Historic England review comments on these documents have been incorporated into the final versions that form DCO application documents (various Volume 3 appendices of the ES (Document Ref: 6.3.1.1 – 6.3.8.4)).	N
Methodology	Whilst we agree the NPPF can help to support the EIA methodology and associated definitions, we recommend that reference to the Marine Policy Statement and National Policy Statement EN-1 are more prominently utilised in this regard.	Historic England	This is noted. The Marine Policy Statement (DEFRA, 2020) and National Policy Statement EN-1 (DESNZ, 2023) have been given more prominence within Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).	N
Methodology	We consider that the comment we made in relation to the Scoping Report that the “archaeological assessment technical reports included at the stage of the preapplication should be given the complete autonomy to issue recommendations as to where such acquired data is insufficient, lacking in resolution or demonstrating gaps in coverage. Such that plans for schemes of further work can be effectively captured within supporting documentation attached to any consent granted. I.e. through an Outline Offshore Written Scheme of Investigation (WSI)” remains applicable until the ES has been submitted and such detail has been included.	Historic England	The technical experts commissioned to produce the archaeological assessments were provided the autonomy suggested and where insufficient data in the geophysical and geotechnical surveys was identified relevant recommendations have been made to ensure that potential features and associated impacts are accurately identified, characterised, and mitigated. The assessments have evolved, and in particular have informed the Outline Offshore Written Scheme of Investigation (OOWSI) which is presented as a key DCO application document (Volume 3, Appendix 7.5: Outline Offshore Archaeological Written Scheme of Investigation of the ES (Document Ref: 6.3.7.5)).	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Methodology	Similarly, the appointed archaeologists (in their various roles and capacities) should also be afforded such autonomy to make recommendations, based on their specialist knowledge and experience throughout the project's timeline.	Historic England	<p>Noted. The appointed archaeologists commissioned to technically review and advise the archaeological assessments were provided the autonomy suggested and their recommendations were included in all reports and recommendations.</p> <p>A Statement of Expertise is included at Volume 1, Appendix 1.1 of the ES (Document Ref: 6.1.1.1) which presents the qualifications and experience of the authors of the marine archaeology and cultural heritage ES chapter. The OOWSI (Document Ref: 6.3.7) sets out the various other roles and capacities relevant to the current and ongoing OOWSI framework.</p>	N
Methodology	7.4.11 - We note results of the analysed marine geophysical survey data will be included within the final marine archaeology and cultural heritage ES marine archaeology chapter. We would expect the result of this report (when accepted) will also be included in the Outline Offshore WSI.	Historic England	The results of the geophysical analysis have been used to inform the OOWSI (Document Ref: 6.3.7.5) and the parallel ES chapter (Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7)). The geophysical analysis has, in particular, helped to identify a suite of potential and confirmed archaeological features, which in turn have produced a suite of proposed Archaeological Exclusion Zones (AEZs) and recommendations for micrositing. The AEZs are set out as commitments (Volume 1, Appendix 3.1: Commitments Register of the ES (Document Ref: 6.1.3.1)).	N
Clarity	Table 7.11 – the definition relating to Low and Negligible Magnitude of Impact includes the statement “Changes that result in elements of a heritage asset's fabric or setting detracting from its cultural significance being removed”, which we found to be unclear.	Historic England	The text referenced has been revised in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Clarity	Table 7.13 – It is unclear why the projects technical Appendix 7.1: Stage 1 Geoarchaeological Review of Marine Geotechnical Investigation has not been included here.	Historic England	The sources have been updated in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7) to include reference to this.	N
Methodology	Under the heading of 'Historical and Archaeological Background, Prehistoric (970,000 BC –43 AD)' we recommend that given the rarity in corresponding offshore developments in the South West that this chapter and the associated WSI consider the content used to inform the White Cross Offshore Windfarm (MLA/2023/00113) – from within the Archaeological Assessment of Geophysical and Hydrographic Data (produced by MSDS Marine) - found on the marine management organisations public register.	Historic England	This information has been used to inform the background information in the Volume 3 Appendix 7.1: Marine Archaeology Desk-based Assessment (Document 6.3.7.1) and in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Methodology	<p>As such, given the projects share a similar offshore cable route for some extent, we believe this will aid in supporting conclusions on the potential impact this project may generate. In particular related to submerged Palaeolandscape deposits. With the objectives to gather evidence on:</p> <ul style="list-style-type: none"> • Glacial sediments (in particular associated to the Western Irish Sea or Cardigan Bay Formations) • Pleistocene and Holocene fluvial and related features • Holocene organic sediments laid down prior to marine inundation by c. 5k BP • Marine sediments post-dating the Holocene marine transgression. 	Historic England	<p>This information has been used to inform the background information in the Volume 3 Appendix 7.1: Marine Archaeology Desk-based Assessment (Document 6.3.7.1) and in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).</p>	N
Methodology	<p>Paragraph 7.5.9 – Also of relevance, ideally the work looking into the influence of crustal rebound from the glacial unloading of northern Britain and the associated melt-water loading of the adjacent seas and Atlantic Ocean on sea levels should be included here.</p>	Historic England	<p>This information has been used to inform the background information in the Volume 3 Appendix 7.1: Marine Archaeology Desk-based Assessment (Document 6.3.7.1), geoarchaeological and palaeolandscape assessments (Volume 3, Appendix 7.3: Stage 1 and 2 Marine Geoarchaeological Assessment (Document Ref: 6.3.7.3) and Volume 3, Appendix 7.4: Palaeolandscapes assessment of sub-bottom profiler data (Document Ref: 6.3.7.4)) and in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Guidance	<p>We request that the chapter include reference to how the English Palaeolithic and Pleistocene remains are of both national and international significance, with regard to Historic England's 2023 guidance Curating the Palaeolithic.</p> <p>Furthermore, the Resource Assessment and Research Agenda for the South West should be utilised to inform a robust desk based study of prehistoric potential. In addition, the subdivisions of the Palaeolithic period should be checked for accuracy.</p>	Historic England	<p>Potential Pleistocene and Palaeolithic remains have been considered of up to high significance (National) depending upon the type and extent of the remains present as a result of the assessment of the geotechnical boreholes and the sub-bottom profiler data (Volume 3, Appendix 7.3: Stage 1 and 2 Marine Geoarchaeological Assessment (Document Ref: 6.3.7.3) and Volume 3, Appendix 7.4: Palaeolandscapes assessment of sub-bottom profiler data of the ES (Document Ref: 6.3.7.4)). This information has been used to inform the background information in the Volume 3 Appendix 7.1: Marine Archaeology Desk-based Assessment (Document 6.3.7.1) and in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7) and the significance determination.</p>	N
Methodology	<p>There is also no reference to the assessment of Sub-Bottom Profiler data. Which was detailed as being acquired in the Scoping Report. We recommend that this is checked, and such data is archaeologically assessed and incorporated appropriately.</p>	Historic England	<p>The sub-bottom profiler data has been analysed and reported in Volume 3, Appendix 7.4: Palaeolandscapes assessment of sub-bottom profiler data (Document Ref: 6.3.7.4), of the ES and summarised in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).</p>	N
Existing archaeological sites	<p>7.5.15 During the Bronze Age (2200–800 BC) - Moor Sand and Salcombe B sites, and the Erme Ingot site (all in South Devon) certainly point toward some of the first evidence of a proper bulk trade with Europe.</p>	Historic England	<p>This information has been used to inform the background information in the Desk-based Assessment (Volume 3, Appendix 7.1: Marine Archaeology Desk-based Assessment of the ES) and in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Existing archaeological sites</p>	<p>7.5.19 – Whilst we agree that the paucity of evidence for coastal Roman sites and Roman ships does not discount the potential for Roman activity to be found within the study area. It is worth mentioning here that such evidence may not always definitively point specifically to Roman activity from this period. Uncertainty surrounding the Romano-Celtic Barland’s Farm Boat is a good example of fused shipbuilding ideas resulting in a ‘single’ tradition. With an ability, like many other vessels of it’s time to sail the Severn estuary and Bristol Channel, and would have been of great importance to the economic and social life of the region.</p>	<p>Historic England</p>	<p>This is noted. This information has been used to inform the background information in the Desk-based Assessment (Volume 3, Appendix 7.1: Marine Archaeology Desk-based Assessment of the ES (Document Ref: 6.3.7.1)) and in the baseline section of Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).</p>	<p>N</p>
<p>Existing archaeological sites</p>	<p>Post-medieval (AD 1540–1900) and Modern (AD 1900 – modern day) – to inform this sub-section the Wessex Archaeology Ltd (2011) Assessing Boats and Ships 1860-1913 (which is included as a reference) explains that the period from 1860 to 1913 “was arguably the most important in British maritime history”. With rapid “technological innovation fuelled by the Industrial Revolution and the demands of an expanding worldwide merchant marine and navy [that] revolutionised the design and use of ships” (paragraph 7.1.1).</p>	<p>Historic England</p>	<p>This is noted. This information has been used to inform the background information in the Desk-based Assessment (Volume 3, Appendix 7.1: Marine Archaeology Desk-based Assessment of the ES (Document Ref: 6.3.7.1)) and in the baseline section of Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Clarity	<p>7.5.52 and 7.8.6 – Although we can see benefits of drawing out the differences between shipwreck remains in relation to their material tolerances, we do however feel that it does in this instance overcomplicate the EIA process. In addition, to some degree it does not account for composite hulled vessels, or those that could be iron or steel but a rarity within the archaeological record – thereby potentially unwittingly dismissing their heritage interest simply on the material used in its construction.</p> <p>Therefore, we request that such an approach is reconsidered ahead of any ES submission.</p>	Historic England	The receptors have been reconsidered and laid out in Table 7-20 in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).	N
Methodology	<p>In 7.8.1 and throughout the document the term “preservation by record” is used. This as a phrase in relation to the historic environment is no longer in use within planning policy in England. Which is in part due to the nature of the destructive process of archaeological excavation, and that any such practical work should look to balance the need for recording strategies with interpretation (relevant to research questions).</p>	Historic England	<p>Noted. This has been reconsidered in the mitigation presented in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7). Details of the mitigation strategy elements including physical archaeological investigation and interpretation are presented in Appendix 7.5 to the ES: Outline Offshore Archaeological Written Scheme of Investigation (Document Ref: 6.3.7.5).</p>	N
Methodology	<p>In Table 7.16 it is stated that relevant results from geotechnical surveys will be shared with the Archaeological Data Service (ADS), with the aim to enhance the palaeogeographic knowledge and understanding of the area. Whilst we welcome this, we also consider that submitting results to a grey literature archive shouldn't be the only aspirational publication outcome of such a project.</p>	Historic England	<p>Noted. This has been reconsidered in the mitigation presented in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7). An outline of the potential publications that could be considered following completion of necessary archaeological investigation is presented in Volume 3, Appendix 7.5: Outline Offshore Archaeological Written Scheme of Investigation (Document Ref: 6.3.7.5).</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Methodology	7.8.16 – States that “The Proposed Development embedded mitigation includes archaeological assessment of the offshore geophysical surveys”. Due to the stage the project is at we feel that characterisation assessments are not mitigation in themselves. As they inform further evaluation or mitigation strategies, such as avoidance. In addition, we believe it conflicts with the statement in 7.8.17 and approach in 7.8.35.	Historic England	Noted. This has been reconsidered and is now included as part of secondary measures that would inform the proposed mitigation strategy. This is presented in Table 7-21 in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7) and explained in more detail in Volume 3, Appendix 7.5: Outline Offshore Archaeological Written Scheme of Investigation (Document Ref: 6.3.7.5).	N
Clarity	7.8.19 to 7.8.26 - we consider there needs to be a subheading or an introductory statement as to what it is that is being conveyed. Is it that the impact magnitude to those listed receptors would be low adverse or medium adverse if mitigation is or is not applied? We feel this needs more thought.	Historic England	An introductory paragraph has been added in each discussion of Magnitude of Impact for each impact in sections 7.10, 7.11 and 7.12 in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Clarity	<p>Similarly, we consider that many of the direct impacts and indirect impacts could be packaged together, due to the continued repetition throughout the chapter. For instance, Impacts (1-5): Direct impact to potential heritage assets prior to mitigation – from activities:</p> <ol style="list-style-type: none"> 1. Direct disturbance of sediment during seabed preparation works; 2. Direct disturbance from compression or penetration during construction; 3. Direct disturbance from compression or penetration by anchoring during seabed preparation works and construction; 4. Seabed contact by legs of jack-up vessels and / or anchors; and 5. Cable installation at the landfall. 	Historic England	The impacts have been reconsidered and packaged together to streamline the discussion of impacts as presented in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).	N
Palaeolandscapes impact	7.8.53 - Can it be explained as to why the impact magnitude to sub-seabed deposits of palaeoenvironmental interest is expected to be no more than low adverse?	Historic England	Impact magnitude is expected to be no more than low adverse given the localised nature of the impact and scale of the deposits identified in the geoarchaeological and palaeolandscapes assessment. See Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Baseline archaeological assessments	<p>We are of the opinion that Impact 5 needs further consideration with respect to the terms and processes of EIA for schemes deemed to be Nationally Significant Infrastructure Projects. Whilst we accept that the extent of newly discovered archaeological sites necessitates an accurate baseline, this is only required to address the impacts from the newly installed infrastructure. Directly through interactions, or indirectly as a result of seabed changes, as well as to establish an effective archaeological exclusion zone.</p>	Historic England	<p>This impact has been reconsidered and removed. The concerns addressed in this impact have been captured within the Interrelated effects in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).</p>	N
Review process	<p>As such we consider that where there is uncertainty about the significance of a newly discovered heritage asset, or the potential extent of its associated remains, then this needs to be reviewed on a case-by-case basis. In doing so this would afford the developer an understanding of what their responsibilities are in relation to the mitigation hierarchy, and the requirements for ongoing monitoring. This is also something we consider is supported by the guiding principles of NPS EN-1 Paragraph 5.9.12, 5.9.19 & EN-3 Paragraph 2.8.77.</p>	Historic England	<p>The mechanism for the review process, which would include assessment of the asset either following retrieval or through remote sensing or remote operated vehicle footage to determine the type, significance and extent of any newly discovered assets and extent of associated remains has been outlined in Volume 3, Appendix 7.5: Outline Offshore Archaeological Written Scheme of Investigation (Document Ref: 6.3.7.5) and Volume 3, Appendix 7.6: Protocol for Archaeological Discoveries (Document Ref: 6.3.7.6).</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Approach to assessment</p>	<p>With respect to the 'Magnitude of Impact' assigned for Impact 5, to receptors such as palaeolandscape and sub-seabed deposits of palaeoenvironmental interest, we encourage you to revise these and determine them with respect to the current geoarchaeological logging and recording of cores. In addition will this assessment of vibrocores include reference to sub-bottom profile data, to aid in generating a deposit model to form 'Further Mitigation' (page 63).</p> <p>Impact 8 makes reference to 'potential marine heritage receptors during maintenance activities (Operational-repair), or from alteration of local currents resulting in scour (Operational-normal)'. Are such impacts relevant to known heritage assets also?</p> <p>Similarly, is this the case for Impact 9?</p>	<p>Historic England</p>	<p>Impact 5 has been reconsidered and removed. The assessment of the sub-bottom profiler data was undertaken in respect to the assessment of the vibrocores and results were considered as part of the deposit model. These can be found in Volume 3, Appendix 7.3: Stage 1 and 2 Marine Geoarchaeological Assessment of the ES (Document Ref: 6.3.7.3) and Volume 3, Appendix 7.4: Palaeolandscapes assessment of sub-bottom profiler data of the ES (Document Ref: 6.3.7.4). The results of these assessments have informed the assessment of significance and potential impact and is presented in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).</p>	<p>N</p>
<p>Approach to assessment</p>	<p>7.9.34 – States (as do other paragraphs) that a mitigation strategy may include “geoarchaeological assessment and testing of the surviving borehole cores taken during the 2023 geotechnical investigation”. Could it be clearly explained what is meant by “surviving boreholes”?</p>	<p>Historic England</p>	<p>The state of preservation of the cores was not known at the time of writing the PEIR. The cores identified as of interest survived intact and were sent to Wessex Archaeology for analysis and the report is appended to the ES (Volume 3, Appendix 7.3: Stage 1 and 2 Marine Geoarchaeological Assessment (Document Ref: 6.3.7.3) of the ES). The results were used to inform the baseline and the impacts presented in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7).</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Cross border assessments	7.12.3 – Given there are equivalent level environmental surveys being undertaken within the French jurisdiction (equivalent to those undertaken in UK waters), including the archaeological review of geotechnical investigations to identify features of archaeological interest in French waters. We would be interested to hear of opportunities for a cross border synthesis of submerged landscape deposits along the cable route study area.	Historic England	It is anticipated that the results of the geotechnical and geophysical investigations undertaken within French waters will be used to better inform the results of any further investigations undertaken in British waters. The combined results will allow for a broader understanding of the potential and will inform the scope and analysis of any future works within the region both on this project and, once the results are made publicly available, on future projects.	N
Monitoring	7.14 'Summary of Impacts, Mitigation Measures and Monitoring' – a reference to the importance of post-construction monitoring should be included here. We welcome further detail on cumulative impacts following the archaeological assessment of the site-specific Sub-bottom Profiling, Sidescan Sonar, Magnetometer and Multibeam Bathymetry surveys, and the geoarchaeological investigation (7.14.4).	Historic England	A reference to the importance of post-construction monitoring has been added in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7). Cumulative impacts are assessed in Volume 3, Chapter 7: Marine Archaeology & Cultural Heritage of the ES (Document Ref: 6.3.7). The results of the site-specific Sub-bottom Profiling, Sidescan Sonar, Magnetometer and Multibeam Bathymetry surveys, and the geoarchaeological investigation were used to inform the potential for cumulative effects on identified assets.	N
Correction	Volume 3, Figure 7.2 – Scheduled Monuments of two wrecks are not annotated correctly on 'sheet2'	Historic England	Noted and updated on Volume 3, Figure 7.1: Designated Heritage Assets of the ES.	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Approach to assessment</p>	<p>Volume 3, Appendix 7.1: Stage 1 Geoarchaeological Review of Marine Geotechnical Investigation</p> <p>After reviewing the document, we are concerned the intended focus of the report appears to rest specifically on the identification and characterisation of palaeoenvironmental and archaeological remains on the near-shore continental shelf within just 3 selected cores (Section 1.3.2-1.3.3).</p>	<p>Historic England</p>	<p>An updated stage 1 geoarchaeological assessment (Volume 3, Appendix 7.3: Stage 1 and 2 Marine Geoarchaeological Assessment of the ES (Document Ref: 6.3.7.3)) was undertaken as part of the Stage 2 assessment of three identified cores which provides characterisation and consideration of the wider seabed as well as the near-shore continental shelf.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Baseline archaeological assessments</p>	<p>Evidence for the Palaeolithic and Mesolithic terrestrial landscape extends across the continental shelf. This information is highlighted in the 2011 'Offshore Geotechnical Investigations and Historic Environment Analysis: Guidance for the Renewable Energy Sector' document, a document that has been widely used throughout this report. Section 8 Research Agendas highlights the dual purpose of these investigations is not only to inform on the potential impacts of the development on the historic environment but also to increase knowledge and understanding of the UK's prehistoric past and the submerged former terrestrial landscape of the continental shelf. It goes on to outline the research aims in Maritime and Marine Historic Environment Research Framework for Mesolithic and Palaeolithic submerged archaeological research, commissioned by English Heritage. One of which focused on developing a clearer picture of the role of the continental shelf in the Mid-Upper Palaeolithic transition between 45,000–30,000 years BP (8.16 p. 18).</p>	<p>Historic England</p>	<p>This is noted.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Approach to assessment</p>	<p>Therefore, the statement in section 1.3.2 (below) is misleading and should in fact extend that focus across the entire research area, including all 44 cores, to encompass the Mesolithic and further Palaeolithic landscapes.</p> <p>'As terrestrial environments are of greatest geoarchaeological potential, the nearshore continental shelf (above elevations of c. -18m relative to sea-level) comprises the principal zone of geoarchaeological potential where remnants of now offshore terrestrial sediments could harbour archaeological and palaeoenvironmental remains'</p>	<p>Historic England</p>	<p>Noted. An updated stage 1 geoarchaeological assessment (Volume 3, Appendix 7.3: Stage 1 and 2 Marine Geoarchaeological Assessment of the ES (Document Ref: 6.3.7.3)) focussing on the entire research area was undertaken as part of the Stage 2 assessment of three identified cores. The potential Palaeolithic and Mesolithic landscapes and deposits were also considered as part of Volume 3, Appendix 7.4: Palaeolandscapes assessment of sub-bottom profiler data of the ES (Document Ref: 6.3.7.4)).</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Approach to assessment</p>	<p>Furthermore, work carried out by Coracle Archaeology (Grant 2022) on core samples located along the Celtic Interconnector cable route found that the channel sequences were attributable to a cold stage lowstand, with local pine woodland confirmed by the presence of pollen, stomata cells and wood, as well as a number of pollen types typically found in Early to Middle Pleistocene deposits. (CA 2023, forthcoming). The radiocarbon dates pre-dated the MIS2 (>55 ka), conforming with the pollen assemblage, which indicated the presence of some earlier Pleistocene floras (Grant 2022). The Celtic Interconnector route intersects the Xlinks route in proximity to the Isle of Scilly, running roughly parallel with Xlinks boreholes 1-15, therefore these boreholes may contain similar deposits of significant geoarchaeological interest.</p> <p>To conclude, at this stage, we feel the requirements of a Stage 1 geoarchaeological assessment, outlined by WSP, has not been met.</p>	<p>Historic England</p>	<p>The stage 1 & 2 report by Wessex Archaeology (Volume 3, Appendix 7.3: Stage 1 and 2 Marine Geoarchaeological Assessment of the ES (Document Ref: 6.3.7.3)) includes a fuller assessment and a deposit model which includes a complete assessment of the vibrocores taken including the area where the Celtic Interconnector project area intersects with the proposed development. An additional borehole was identified as of interest as a result and Stage 2 investigations will be undertaken on it. The potential Palaeolithic and Mesolithic landscapes and deposits were also considered as part of Volume 3, Appendix 7.4: Palaeolandscapes assessment of sub-bottom profiler data of the ES (Document Ref: 6.3.7.4)). These results have been shared with the Celtic Interconnector team to allow for a more complete understanding of their remains.</p>	<p>N</p>
<p>Approach to assessment</p>	<p>Going forward, to address these research aims, the Stage 1 review report should include a descriptive assessment and discussion of the Pleistocene deposits in the remaining cores, readdressing the potential for palaeoenvironmental remains following a more detailed assessment of previous borehole data and available literature. This information should be added to Table 1-4.</p>	<p>Historic England</p>	<p>The stage 1 & 2 report by Wessex Archaeology (Volume 3, Appendix 7.3: Stage 1 and 2 Marine Geoarchaeological Assessment of the ES (Document Ref: 6.3.7.3)) provides a descriptive assessment and discussion of the Pleistocene deposits in the remaining cores and readdresses the potential for palaeoenvironmental remains within the rest of the project boreholes.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Approach to assessment</p>	<p>Volume 3, Appendix 7.2: Outline Offshore Archaeological Written Scheme of Investigation</p> <p>1.1.3 - An updated Outline Offshore Archaeology Written Scheme of Investigation (OOAWSI) should be submitted with the DCO application (at ES stage). This enables the developer, subject to consent, to utilise strategies for further schemes of work.</p> <p>Furthermore, to commission a retained archaeologist to utilise the Outline WSI, and the ability to review and update and resubmit for Historic England's agreement post consent with respect to the timeframes set out in the deemed marine licence schedule. It is worth noting that Table 1 of The Crown Estate's WSI guidance provides an indicative example timeline.</p>	<p>Historic England</p>	<p>The Outline Offshore Archaeological Written Scheme of Investigation has been updated for the ES and is appended (Volume 3, Appendix 7.5 (Document Ref: 6.3.7.5) to the ES). A retained archaeologist will be commissioned to fulfil the role as set out in (Volume 3, Appendix 7.5: Outline Offshore Archaeological Written Scheme of Investigation of the ES (Document Ref: 6.3.7.5)) and will have the ability to review and update and resubmit for Historic England's agreement post consent within the timeframes required of the deemed marine licence.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Existing archaeological sites</p>	<p>The 'Archaeological Potential' section requires detail on Palaeolithic potential.</p> <p>Furthermore:</p> <p>Bronze Age (2200–800 BC), 1.3.6 - should include maritime archaeological evidence from south Devon.</p> <p>Roman (AD 43–410) see Nayling, N., McGrail, S., 2004. The Barland's Farm Romano-Celtic Boat, CBA Research Report 138. Council for British Archaeology, York.</p> <p>Post-medieval (AD 1540–1900) and Modern (AD 1900 – modern day) – to inform these sections the Wessex Archaeology Ltd (2011) Assessing Boats and Ships 1860-1913 describes the period from 1860 to 1913 as arguably the most important in British maritime history. With rapid technological innovation fuelled by the Industrial Revolution and the demands of an expanding worldwide merchant marine and navy revolutionising the design and use of ships (7.1.1).</p> <p>1.3.18 - Iron and steel hulled vessels only became prominent in the UK from the latter 1860s onwards. See Wessex Archaeology Ltd (2011) Assessing Boats and Ships 1860-1913.</p>	<p>Historic England</p>	<p>Noted. This has been addressed in Volume 3, Appendix 7.5 of the ES (Document Ref: 6.3.7.5).</p>	<p>N</p>
<p>Research</p>	<p>Section 1.4 'Research Priorities' will need to review and include reference to the Research Agenda for the South West.</p>	<p>Historic England</p>	<p>Noted. This has been addressed in Volume 3, Appendix 7.5 of the ES (Document Ref: 6.3.7.5).</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
AEZs	1.5 Committed Mitigation Measures, Embedded Mitigation 1.5.1 & sub-heading 'Archaeological Exclusion Zones'. AEZs should only be formulated and finalised on full review of marine geophysical survey data, and once all ground truthing work has been completed.	Historic England	The AEZs have been recommended based on Wessex Archaeology's assessment of geophysical data. They will however be reviewed following any ground truthing as this is an iterative process.	N
Mitigation	'Additional Mitigation' 1.5.2 - We accept there may be some instances where isolated objects present a constraint to seabed work. We agree that a methodology for further managing such objects should be set out in a method statement. However as is general practice, the Marine Management Organisation (MMO) may not wish to be consulted. In which case, agreement of a method statement may only be required from Historic England in good time prior to works commencing. This will similarly need to be reflected in paragraph 1.6.3 and 1.7.59.	Historic England	Noted. This has been addressed in Volume 3, Appendix 7.5 of the ES (Document Ref: 6.3.7.5).	N
Guidance	With respect to the functions of the Protocol for Archaeological Discoveries (PAD) and the detail retained in 1.7.14, we are of the understanding that the Developer may utilise the expertise of their Retained Archaeologist or Specialist Archaeological Contractors to manage the PAD. Outwith of the ascribed Implementation Service referenced here, but in keeping with best practice principles set out in The Crown Estate (2014), Protocol for Archaeological Discoveries: Offshore Renewables Projects guidance.	Historic England	Noted, the Retained Archaeologist will manage the PAD and will undertake the duties noted in the Volume 3, Appendix 7.5: Outline Offshore Archaeological Written Scheme of Investigation of the ES (Document Ref: 6.3.7.5) in keeping with best practice principles set out in Protocol for Archaeological Discoveries: Offshore Renewables Projects guidance (The Crown Estate, 2014). This has been addressed in Volume 3, Appendix 7.5 of the ES (Document Ref: 6.3.7.5).	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Reporting	In addition, due to the schemes of investigation proposed, the requirement for a separate project report “presenting the results of the PAD implementation during activities and submitted to the MMO within four months” (1.7.18) may not be deemed necessary, as alluded to in 13.2.2 of The Crown Estate (2021), Archaeological Written Schemes of Investigation for Offshore Wind Farm Projects guidance.	Historic England	Noted. This has been addressed in Volume 3, Appendix 7.5 of the ES (Document Ref: 6.3.7.5).	N
Methodology	We welcome being consulted on the scope of all further geophysical surveys undertaken for the project to ensure that the data generated are sufficiently robust to meet these archaeological objectives and to enable professional archaeological interpretation and analysis (1.7.27) and agree that this would be best informed through a method statement (1.7.29).	Historic England	Noted.	N
Consultation	We agree with the provision outlined in 1.7.31 and 1.7.57. However, Historic England should be consulted on how and when any such notification is carried out also.	Historic England	Noted. This has been addressed in Volume 3, Appendix 7.5 of the ES (Document Ref: 6.3.7.5).	N
Revisions to WSI	We would recommend keeping revisions of the WSI during post-consent down to a minimum. As this reduces confusion. The use of Construction Method Statements which detail the final design in relation to finalised AEZs alongside other mitigation measures are a good way to ensure a collective understanding in the build up close to construction.	Historic England	Noted.	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Reporting	Paragraphs 1.7.62 and 1.7.64 - Prepared reports may not need to be issued to the MMO, as you will note they are not explicitly referenced within The Crown Estate (2021), Archaeological Written Schemes of Investigation for Offshore Wind Farm Projects guidance	Historic England	Noted.	N
Monitoring	Specifically related to the sub-heading 'Monitoring', a method statement should be produced to effectively direct post-construction monitoring. Furthermore, dependent on the type of remains being monitored it is worth considering other methods of survey, such as the use ROV or Diver, to support conclusions on development related impacts.	Historic England	Noted, the monitoring methods have been updated to include additional options for monitoring per the suggestion. This has been addressed in Volume 3, Appendix 7.5 of the ES (Document Ref: 6.3.7.5).	N
Research	Under the sub-heading 'Archaeological Recording, Reporting, Data Management and Archiving' it may also be important to factor in time for some degree of appropriate desk-based or archival research into sites, features and finds given the breadth of material that constitute the marine historic environment. This can also provide measures to meet the policy provisions set out in EN-3 (3.8.191). Similarly, the project should consider how to more widely publicise (in various forms) some of the positive results from their archaeological works (across on and offshore) to bring about full public value potential.	Historic England	Noted, the reporting options have been updated per the suggestion. The type of reporting would be proportionate to the type and extent of remains identified during the project. This has been addressed in Volume 3, Appendix 7.5 of the ES (Document Ref: 6.3.7.5).	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Marine environment				
Impact to marine environment	The MMO notes that the potential risk of all chemicals used, that have a pathway to the marine environment from the construction, operation, maintenance and decommissioning of the proposed development should be considered and assessed within the ES.	MMO	There are no planned discharges of chemicals to the marine environment. The principal offshore water quality assessment is undertaken in Volume 3, Chapter 8: Physical Processes of the ES (Document Ref: 6.3.8). Pollution prevention measures (minimising risk from accidental spillage for example) will be implemented by the Pre-Construction Offshore Construction Environmental Management Plan (an outline CEMP is presented as part of the application for DCO (Document Ref: 7.9)).	N
Marine mammals				
UXO clearance	UXO clearance: JNCC acknowledge and agree with the decision to not include UXO clearance within license application and subsequent HRA. We welcome the approach that a stand-alone application to determine UXO removal will be applied for if it is needed during the pre-lay works.	JNCC	Noted.	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
HRA Screening	<p>Bristol Channel Approaches SAC: This is the only harbour porpoise SAC that is crossed by the proposed cable corridor. Conservation Objective 3 for this site states that “The condition of supporting habitats and processes, and the availability of prey is maintained’. However, Table 6.3 (HRA screening for Likely Significant Effects on European and Ramsar Sites), has screened out ‘Physical change to another seabed/sediment type’ of the assessment for this site. The justification provided for this decision is that “although prey species may be displaced initially during the installation, this change in habitat type may result in an artificial reef effect, potentially influencing the fish assemblage present”. We recommend that this rationale is supported with relevant evidence, as a permanent physical change to the seabed may impede the maintain conservation objective of the site, in reference to CO3. The potential effects of the projects works on the habitat of porpoise and their prey should be considered.</p>	JNCC	<p>These comments on the HRA Screening report have been taken into account when preparing the Report to Inform Appropriate Assessment (RIAA) (Document Ref 7.17) which is submitted alongside the ES. Specifically, consideration of the implications for the marine mammal populations of the Bristol Channel Approaches SAC has been undertaken in the HRA RIAA (Document Ref 7.17), both potential direct impacts and impacts on Conservation Objective 3.</p> <p>Potential indirect impacts through changes to the seabed for marine mammals and sea turtles are also presented in Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document Ref: 6.3.4).</p> <p>As detailed in Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES (Document Ref: 6.3.2), habitat alteration and long-term habitat loss as a result of the placement of rock protection along cables is not estimated to result in significant impact on any fish or shellfish receptors. Any indirect effects of such changes on harbour porpoise would be anticipated to be negligible.</p> <p>The RIAA concludes no Adverse Effect on the Integrity of all sites, including the Bristol Channel Approaches SAC.</p>	N
HRA Screening	<p>Other harbour porpoise sites: We agree with the conclusions of the LSE test of the project alone for all other harbour porpoise SACs due to their distance being >40km from the proposed works. We defer to the relevant agencies for matters relating to inshore sites.</p>	JNCC	Noted. No changes required to HRA Screening.	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
HRA Screening	In-combination assessment: We agree with the conclusions regarding plans and projects to be screened in to the in-combination assessment. The Zone of Influence of 30km applied is appropriate and reflects a precautionary approach given maximum EDR proposed in the noise management approach for harbour porpoise SACs (JNCC, 2020).	JNCC	Noted. No changes required to HRA Screening.	N
MMMP	The MMO notes in paragraph 4.7.3 of the PEIR that a Marine Mammal Mitigation Protocol (“MMMP”) was proposed as part of the Scoping Report. However, the chapter concludes that a MMMP is no longer needed due to the lack of activities that produce impulsive noise association with the proposed development. The MMO defers to the relevant SNCBs regarding the need for an MMMP.	MMO	Noted. To confirm, consultations were undertaken with Natural England. Natural England agreed with not including a Marine Mammal Mitigation Plan (MMMP) for the main Proposed Development activities, i.e. no MMMP required for the application for DCO. Natural England recommended that a MMMP should be included in UXO licence applications where these are required.	N
Vessel Management	One of the embedded measures in table 4.17 of the PEIR is the inclusion of a Vessel Management Plan (“VMP”). The VMP will confirm the types and numbers of vessels that would be engaged on the proposed development and consider vessel coordination including indicative transit route planning. The proposed implementation of a VMP will reduce the risk of vessel disturbance by controlling the speed and movement of vessels, limiting vessel speed and ensuring predictable routes which are less likely to cause disturbance. The MMO supports the inclusion of a VMP.	MMO	Noted. An Outline Navigational Safety and Vessel Management Plan (NSVMP) (Document Ref: 6.3.5.2) is provided in Volume 3, Appendix 5.2 of the ES. The NSVMP will be updated prior to construction commencement, when details of specific vessels, transit routes etc are confirmed.	N

<p>Methodology</p>	<p>The modelling methodology presented in the underwater noise assessment at volume 3 appendix 4.1 of the PEIR is based on the National Marine Fisheries Service (“NMFS”) multi-species calculator for predicting the underwater noise levels and the subsequent marine mammal and fish species impact ranges. The MMO considers this to be a reasonable approach for assessing the proposed noise generating activities, which are deemed to be “low-risk”. However, the inherent simplifications of this methodology come with several challenges related to the interpretation of the modelling outputs and the risk of impacts on the animal receptors. For example, the calculation of impact ranges for cumulative exposure effects (such as Permanent Threshold Shift (“PTS”) and Temporary Threshold Shift (“TTS”) for marine mammals), assumes stationary receptors (and noise sources) for the entire duration of the activities (typically 24 hours). While in general this can be considered a very precautionary approach, it can serve as proof that impacts are unlikely if the relevant injury thresholds are not reached, or if the predicted impact ranges are very small. Conversely, if the impact ranges derived from a precautionary assessment are rather large (e.g., extending over several km or even more than 10 km, as observed in table 7.3 on page 21 for TTS effects) then it becomes much more challenging to interpret the results and to determine what the likely outcomes would have been if a more realistic approach (i.e., one with less unnecessary conservatism, but at the expense of simplicity) had been used instead.</p>	<p>MMO</p>	<p>The underwater noise modelling has been updated for the ES (Volume 3, Appendix 4.1 Underwater Noise Technical Assessment of the ES (Document Ref: 6.3.4.1)). Revised modelling now accounts for moving animals (with average swim speed of 1.5m/s). Each 1 second period of exposure is assessed separately, resulting in a series of discrete Sound Exposure Level (SEL) values of decreasing magnitude. The cumulative SEL is calculated by logarithmically adding the SEL to which an animal is exposed as it travels away from source.</p> <p>As such the calculation of PTS, TTS and noise disturbance impact ranges consider SEL values of lower magnitude over time as a receptor flees from the noise source, which is regarded a more realistic scenario in the ES (compared to the PEIR calculations). The assumptions and limitations of the underwater noise assessment have been detailed in Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document Ref: 6.3.4).</p> <p>The amended approach has been presented and discussed with the MMO, Natural England and the JNCC during preparation of the ES.</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Noise disturbance impact ranges</p>	<p>In particular, the report at volume 3 appendix 4.1 of the PEIR includes several comments and interpretations on the cumulative exposure effect ranges as calculated for stationary marine mammal receptors, with contextual calculations of the “exposure times” for swimming receptors (e.g., in paragraphs 7.2.3 – 7.2.10, then repeated in the Summary and Conclusions, paragraphs 8.3.2 – 8.3.5, and Table 8.3). The MMO considers that the logic of these calculations and their interpretation is flawed, for the reasons presented below.</p>	<p>MMO</p>	<p>This is noted.</p> <p>The underwater noise modelling has been updated for the ES in Volume 3, Appendix 4.1: Underwater Noise Technical Assessment (Document Ref: 6.3.4.1). Revised modelling now accounts for moving animals (with average swim speed of 1.5m/s). Each 1 second period of exposure is assessed separately, resulting in a series of discrete Sound Exposure Level (SEL) values of decreasing magnitude. The cumulative SEL is calculated by logarithmically adding the SEL to which an animal is exposed as it travels away from source.</p> <p>As such the calculation of PTS, TTS and noise disturbance impact ranges consider SEL values of lower magnitude over time as a receptor flees from the noise source, which is regarded a more realistic scenario in the ES (compared to the PEIR calculations). The assumptions and limitations of the underwater noise assessment have been detailed in Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document Ref: 6.3.4).</p> <p>The amended approach has been presented and discussed with the MMO, Natural England and JNCC during preparation of the ES.</p>	<p>N</p>

<p>Noise disturbance impact ranges</p>	<p>It is stated in several places throughout volume 3 appendix 4.1 of the PEIR that “in order for this threshold to be exceeded, the receptor would have to be stationary within this range from the source for a 24-hour period” (paragraphs 7.2.3 for PTS and 7.2.8 for TTS); or that for the predicted “PTS and TTS impacts to take place, receptors would need to be exposed to the noise levels of the relevant noise emitting activity for a 24-hour period” (paragraph 8.3.2). The MMO consider these statements to be incorrect – in reality, the PTS or TTS thresholds can be exceeded with a shorter exposure period (potentially much shorter in the case of TTS). A full 24-hour period would likely be necessary only if the receptor is stationary at the maximum predicted range. Inside this range (i.e., closer to the noise source), the noise levels are likely to be higher (or indeed, much higher in the case of some of the large ranges, such as some of the TTS ranges). Thus, a much shorter exposure period/duration could produce the same outcome as a longer exposure period further away from the source. For example, if a 24-hour exposure period is needed to exceed the TTS cumulative sound exposure level threshold at 10 km from the source, then at, say, 100 m from the source, where the noise levels could be comparatively 30 decibels (“dB”) higher (assuming, conservatively, a 15 log R transmission loss), then the same threshold would be reached in less than 2 minutes (30 dB translates in three orders of magnitude increase in energy and this reduces the required exposure</p>	<p>MMO</p>	<p>The underwater noise modelling has been updated for the ES in Volume 3, Appendix 4.1 Underwater Noise Technical Assessment (Document Ref: 6.3.4.1). Revised modelling now accounts for moving animals (with average swim speed of 1.5m/s). Each 1 second period of exposure is assessed separately, resulting in a series of discrete Sound Exposure Level (SEL) values of decreasing magnitude. The cumulative SEL is calculated by logarithmically adding the SEL to which an animal is exposed as it travels away from source.</p> <p>As such the calculation of PTS, TTS and noise disturbance impact ranges consider SEL values of lower magnitude over time as a receptor flees from the noise source, which is regarded a more realistic scenario in the ES (compared to the PEIR calculations). The assumptions and limitations of the underwater noise assessment have been detailed in Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document Ref: 6.3.4).</p> <p>The amended approach has been presented and discussed with the MMO, Natural England and JNCC during preparation of the ES.</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
	time by three orders of magnitude, namely from 86,400 seconds to only 86 seconds).			
Noise disturbance impact ranges	<p>Considering the above points, “swim times” cannot simply be calculated across the stationary effect ranges and used as criteria to establish if the effect will occur or not (as attempted in paragraphs 7.2.4, 7.2.9, and in table 8.3). The meaning of these impact zones for stationary receptors is indeed one of indicating the areas where the animals will suffer an impact if they remain for 24 hours, but with the latter being a sufficient, not a necessary, condition (as the example above illustrates). Therefore, if a receptor swims away from the noise source and exits the stationary effect zone after less than 24 hours, there is no guarantee that its accumulated exposure has not exceeded the relevant injury threshold. The noise exposure continues even outside this zone (albeit at lower levels), which could, in principle, still drive the accumulated total exposure above the threshold. More importantly, as the previous example illustrated, the threshold level of exposure can be reached very quickly when closer to the source, and thus a fleeing animal that starts from near the source could exceed the threshold well before crossing the boundary of the “stationary effect zone”.</p>	MMO	<p>The underwater noise modelling has been updated for the ES in Volume 3, Appendix 4.1 Underwater Noise Technical Assessment (Document Ref: 6.3.4.1). Revised modelling now accounts for moving animals (with average swim speed of 1.5m/s). Each 1 second period of exposure is assessed separately, resulting in a series of discrete Sound Exposure Level (SEL) values of decreasing magnitude. The cumulative SEL is calculated by logarithmically adding the SEL to which an animal is exposed as it travels away from source.</p> <p>As such the calculation of PTS, TTS and noise disturbance impact ranges consider SEL values of lower magnitude over time as a receptor flees from the noise source, which is regarded a more realistic scenario in the ES (compared to the PEIR calculations). The assumptions and limitations of the underwater noise assessment have been detailed in Volume 3, Chapter 4: Marine mammals & Turtles of the ES (Document Ref: 6.3.4).</p> <p>The amended approach has been presented and discussed with the MMO, Natural England and JNCC during preparation of the ES.</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Noise disturbance impact ranges</p>	<p>The logic of the “swim times” calculations across the stationary effect zones would work if the noise levels were uniform (constant) inside these zones. In that case, the 24-hours exposure duration inside the zone would be both a sufficient and a necessary condition for exceeding the effect threshold. In reality the noise levels are unlikely to present this picture (especially for the larger zones, where the noise level variation with range can be considerable). A correct assessment of the potential effect zones for fleeing animals would require a more complex modelling methodology that uses fleeing receptors and account for the spatial (and temporal) variability of noise (and accumulated exposure) levels.</p>	<p>MMO</p>	<p>The underwater noise modelling has been updated for the ES in Volume 3, Appendix 4.1 Underwater Noise Technical Assessment (Document Ref: 6.3.4.1). Revised modelling now accounts for moving animals (with average swim speed of 1.5m/s). Each 1 second period of exposure is assessed separately, resulting in a series of discrete Sound Exposure Level (SEL) values of decreasing magnitude. The cumulative SEL is calculated by logarithmically adding the SEL to which an animal is exposed as it travels away from source.</p> <p>As such the calculation of PTS, TTS and noise disturbance impact ranges consider SEL values of lower magnitude over time as a receptor flees from the noise source, which is regarded a more realistic scenario in the ES (compared to the PEIR calculations). The assumptions and limitations of the underwater noise assessment have been detailed in Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document Ref: 6.3.4).</p> <p>The amended approach has been presented and discussed with the MMO, Natural England and JNCC during preparation of the ES.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Noise disturbance impact ranges</p>	<p>It should be noted that the MMO are not particularly concerned about the potential of injury effects from the noise generating activities assessed in this report, but rather with the interpretation of some of the results, as detailed in the points above. Using a more complex modelling methodology that incorporates fleeing receptors would likely result in no exceedance of the cumulative PTS thresholds for marine mammals, and much smaller TTS ranges than the corresponding stationary ones (but not necessarily their complete absence).</p> <p>This would provide a more robust assessment and therefore higher level of confidence in the conclusions made.</p>	<p>MMO</p>	<p>MMO's pragmatic response is noted. The underwater noise modelling has been updated for the ES in Volume 3, Appendix 4.1 Underwater Noise Technical Assessment (Document Ref: 6.3.4.1). Revised modelling now accounts for moving animals (with average swim speed of 1.5m/s). Each 1 second period of exposure is assessed separately, resulting in a series of discrete Sound Exposure Level (SEL) values of decreasing magnitude. The cumulative SEL is calculated by logarithmically adding the SEL to which an animal is exposed as it travels away from source.</p> <p>As such the calculation of PTS, TTS and noise disturbance impact ranges consider SEL values of lower magnitude over time as a receptor flees from the noise source, which is regarded a more realistic scenario in the ES (compared to the PEIR calculations). The assumptions and limitations of the underwater noise assessment have been detailed in Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document Ref: 6.3.4).</p> <p>The amended approach has been presented and discussed with the MMO, Natural England and JNCC during preparation of the ES.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Marine mammal sensitivities</p>	<p>Chapter 4 of the PEIR considers the sensitivity of marine mammals and sea turtles. For each specific marine mammal receptor, the chapter concludes that they are considered to be of “high adaptability, reasonable tolerance, have high recoverability, and are of very high value”. The sensitivity of the receptor ranges from medium (for harbour porpoise) to low (for bottlenose dolphin, common dolphin, Risso’s dolphin, minke whale, and grey seal). The sensitivity of the leatherback turtle has been assessed as negligible. The MMO would question why harbour porpoise has only been assigned ‘medium’ sensitivity when the assessment acknowledges that harbour porpoises are particularly vulnerable to disturbance. Furthermore, all other species (apart from leatherback turtles) have been assigned low sensitivity, even though the assessment acknowledges that there is limited information on the responses of these species to underwater noise. The ES should include more detailed justification as to why these conclusions have been made.</p>	<p>MMO</p>	<p>The justifications and reporting of sensitivity scores have been reviewed and revised as part of the ES preparation, with further evidence sources reviewed. Marine mammal sensitivities to noise and vibration are set out in Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document Ref: 6.3.4).</p>	<p>N</p>
<p>Approach to assessment</p>	<p>Natural England has considered the following documents to make comments on Marine Mammals and Sea Turtles:</p> <ul style="list-style-type: none"> • Volume 3 Chapter 4 Marine Mammals and Sea Turtles • Appendix 4.1 Underwater Noise • HRA 	<p>Natural England</p>	<p>This is noted. (In this instance the HRA refers to the HRA Screening Report.)</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
General	With respect to the PEIR (Volume 3, Chapter 4; Appendix 4.1; and HRA), Natural England does not agree with the scoping out of some impacts, and advises they are scoped into any assessments. Other comments include requests for information and suggestions of plan level mitigation for the Bristol Channel Approaches SAC.	Natural England	<p>This introductory / overview comment is noted. Responses to individual Natural England comments are provided in this table below.</p> <p>In overview, Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document Ref: 6.3.4) and Volume 3, Appendix 4.1: Underwater Noise Technical Assessment of the ES (Document Ref: 6.3.4.1) and the HRA RIAA (Document Ref: 7.16) have been updated to account for Natural England responses to individual comments, with all suggested potential impacts scoped in.</p>	N

<p>Approach to assessment</p>	<p>While Natural England agrees with the scoping out of water quality changes and accidental pollution (as this will be covered in MARPOL); Natural England does not agree with the scoping out of collision with vessels, hearing damage and auditory injury, the presence of electromagnetic fields (EMF) and prey availability.</p> <p>Scoping out collision with vessels and hearing damage and auditory injury cannot be agreed until we have seen a Vessel Management Plan (VMP).</p> <p>Natural England advise that collision with vessels, hearing damage and auditory injury, presence of EMF and prey availability are scoped in and assessed in the EIA.</p> <p>In the absence of information relating to quantities and locations of external cable protection, it is not possible to fully understand the full impact on the Bristol Channel Approaches SAC and therefore NE are unable to agree that prey availability should be scoped out at this stage.</p>	<p>Natural England</p>	<p>Assessment of these potential impacts have been made in the ES i.e. the approach has been updated since PEIR to include (scope in) these potential impacts; see Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document Ref: 6.3.4).</p> <p>The predicted significance of vessel collision risk on marine mammals and sea turtles is found to be minor (not significant in EIA terms). Hearing damage and auditory injury (including temporary change) have been assessed in the ES, as well as disturbance from noise sources, with all impacts predicted to be insignificant (minor or negligible significance).</p> <p>The presence of EMF has been assessed for marine mammals and turtles (updating the PEIR approach).</p> <p>Indirect effects on prey species on marine mammal and sea turtle receptors have also been assessed in the ES.</p> <p>Consideration of the implications for the marine mammal populations of the Bristol Channel Approaches SAC has also been undertaken in the HRA RIAA (Document Ref: 7.16). The HRA is relevant to the harbour porpoise only, as it is the only species of marine mammal that is a qualifying feature of the site. In this regard, the RIAA also includes consideration of Conservation Objective 3 (i.e. 'The condition of supporting habitats and processes, and the availability of prey is maintained'). There are no significant effects, or adverse effects on site integrity identified.</p> <p>A description of the cable protection methods and the specific locations of the x1 crossing (ref. ID84) of an existing cable in the Bristol Channel Approaches SAC have been discussed with Natural England, JNCC and the MMO post PEIR, during the ES preparation phase. Natural England concurred (during the meeting of 12 August 2024) that this specific crossing is located on a low risk benthic habitat type.</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
			An outline NSVMP has been prepared and is included as Volume 3, Appendix 5.2 of the ES (Document Ref: 6.3.5.2).	
MMMP	Natural England agrees with not including a Marine Mammal Mitigation Plan (MMMP) as long as a MMMP is included in the licence application for the geophysical survey and UXO clearance activities.	Natural England	A Marine Mammal Mitigation Plan will be included as part of any UXO clearance marine licence applications (and associated geophysical survey licensing where relevant).	N
VMP	Natural England advise that measures to ensure vessels operate appropriately around marine mammals must be included in a VMP. These measures should be finalised in accordance with best practice at the time. This may include the Scottish Marine Wildlife Watching Code, which we note has been referenced in sections regarding bottlenose dolphins.	Natural England	An outline NSVMP (Document Ref: 6.3.5.2) is submitted along the ES and includes measures to ensure vessels operate appropriately around marine mammals.	N
Bottlenose dolphins	It is unclear if the Coastal West Channel Management Unit (CWC MU) population of bottlenose dolphins has been included in these assessments. Although unlikely to make a material difference to the assessment, Natural England advise that the updated IAMMWG 2023 MU for the Coastal West Channel MU population is included in this assessment.	Natural England	The ES has been refined to make the incorporation of Coastal West Channel Management Unit data clearer (within 'Study Area' section and 'Table 4.17: Key receptors taken forward to assessment' within Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document Ref: 6.3.4).	N

<p>Sea turtles</p>	<p>Natural England agrees with the scoping out of Sea Turtles in underwater noise modelling due to lack of data.</p> <p>However, more robust justification for doing so should be given, demonstrating that data on sea turtles currently does not exist, i.e. even OSPAR does not have population data and note that the Celtic Sea is not considered an area of high use compared to Bay of Biscay and Iberian Peninsula Leatherback turtle (ospar.org).</p> <p>We would also advise that any of sightings of turtles in UK waters be reported to increase the dataset and improve our understanding of turtle distribution.</p>	<p>Natural England</p>	<p>Leatherback turtle are seasonal migrants to UK waters with a preference for more oceanic areas during summer and autumn months. The project has committed (via the outline NSVMP (Document Ref: 6.3.5.2) to report any sightings of turtles in UK waters - to increase the dataset and improve understandings of turtle distribution.</p> <p>The intention at PEIR stage was to scope out underwater noise effects on turtles completely. The ES approach adopted for completeness is to adopt a semi-qualitative assessment of underwater noise impacts on turtles, which includes robust justifications for not completing detailed (turtle specific) modelling.</p> <p>There are limited data on the hearing abilities of leatherback turtle, their uses of sound or their vulnerability to sound exposure. Examinations of green and loggerhead sea turtles (Lenhardt et al., 1985; Wever 1978; Ridgway et al., 1969; c.f. Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document Ref: 6.3.4) for full reference details) revealed that these marine turtles, from the family Cheloniidae, possess a reptilian ear with underwater adaptations, with the retention of air in the middle ear suggesting the ability to detect sound pressure. It is assumed that leatherback turtle, from the family Dermochelyidae, have the same or similar adaptations. The current standing in the scientific community is that fish hearing (rather than mammalian hearing) is the preferred model for marine turtles until more data becomes available (Popper et al., 2014). For this, Popper et al. (2014) proposed the adoption of underwater noise thresholds for Group two fish, which include fishes sensitive to particle motion only; the authors considered this a precautionary approach for marine turtles. Using these thresholds, non-impulsive noise is unlikely to result in mortality, potential mortal injury or minor auditory issue injury (recoverable injury) in marine turtles</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
			(Popper et al., 2014). Regard for these data has been made when setting e.g. the sensitivity rating of turtles within the ES.	
Harbour porpoise	Natural England does not agree with the scoping out of collision risk for harbour porpoise within the Bristol Channel Approaches SAC. Until Natural England sees a VMP we cannot agree with scoping out collision risk and advise that it is scoped into the HRA until then.	Natural England	An outline Navigational Safety and Vessel Management Plan (NSVMP) is presented in Volume 3, Appendix 5.2 of the ES (Document Ref: 6.3.5.2) and HRA RIAA (Document Ref: 7.16), as part of the application for DCO. Collision risk is included in the revised ES assessments (see Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document Ref: 6.3.4) and Collision Risk to Harbour Porpoise (Bristol Channel Approaches SAC) is screened into Stage 2 HRA within the RIAA (Document Ref: 7.16) for completeness.	N

<p>Approach to assessment</p>	<p>With reference to the HRA, Table 6.3 “Rock protection over in-service cable crossings equating to a maximum rock protection footprint of 147,000 m²”, until a map showing where these cable crossings are and how many are within the Bristol Channel Approaches SAC, Natural England advises physical change to another seabed/sediment type and reduction in prey availability remain scoped into the HRA for now.</p>	<p>Natural England</p>	<p>The ES presents figures of the in-service offshore cable crossing locations (Volume 1, Figure 3.10: Offshore Cable Corridor live cable crossings (including relative to protected sites). Further details on offshore cable crossings are provided in Volume 1, Appendix 3.3: Offshore Crossing Schedule of the ES (Document Ref: 6.1.3.3).</p> <p>Within the updated HRA, impact ‘Physical change to another seabed/sediment type’ is presented as no Likely Significant Effect (no LSE). In relation to considerations for Conservation Objective 3 for the site, prey species of harbour porpoise and associated supporting habitats may be affected by the cable laying and a change in seabed (e.g. rock placement on previous supporting habitats). Post PEIR direct consultations with Natural England presented the location of all crossings (12 August 2024). Existing asset Crossing ID84 is situated within the Bristol Channel Approaches SAC. All other crossings are located outside of MPAs. The specific location (of ID84) is, however, a very small area within a large extent of Atlantic Offshore Circalittoral Sand (MD32), which is a habitat type regarded to have low sensitivity to disturbance.</p> <p>It is also a widespread and generic habitat type for the region that does not provide a unique or critical supporting role to harbour porpoise (or its prey species), i.e. the conservation objectives of the protected site will not rely on the support from this specific crossing location. (Further detail of habitats relative to crossing locations is provided in Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1.)) Natural England concurred that this specific crossing is located on a low risk benthic habitat type. Therefore, any effects of long-term habitat change on harbour porpoise are anticipated to be negligible. Natural England concurred with this assessment. Furthermore, Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES (Document Ref: 6.3.2) assessed</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
			<p>habitat alteration and long-term habitat loss as a result of the placement of rock protection and found there to be no significant impact on any fish or shellfish receptors assessed – this assessment of the fish ecosystem included the broad supporting prey species associated with harbour porpoise. In addition, Volume 3, Chapter 4: Marine Mammals & Sea Turtles of the ES (Document Ref: 6.3.4) assessed that indirect impacts to harbour porpoises through changes to the seabed would be not significant i.e. consistent with the assessment of no LSE in the context of HRA Screening (including specific consideration of CO3).</p>	
Ornithology				
<p>HRA Screening</p>	<p>We agree with the method used during the project alone screening exercise with regard to offshore ornithology.</p> <p>We agree with justification and results of the project alone LSE screening with regard to Skomer, Skokholm and the seas off Pembrokeshire SPA.</p>	<p>JNCC</p>	<p>This is noted.</p>	

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>HRA Screening</p>	<p>We disagree with the method used during the in-combination screening exercise with regard to offshore ornithology. The screening criteria for offshore ornithology for the project alone assessment used foraging ranges from Woodward et al. (2019) due to the highly mobile nature of ornithology features. An in-combination assessment should consider other plans and projects which may act in-combination upon feature of SPAs. Therefore, a 30km region around the cable route is not sufficient to capture this. We advise that at the least the same principle of using foraging ranges is applied to screen plans and projects for the in-combination assessment.</p> <p>We therefore do not agree with results of the in-combination LSE screening, and a wider screening distance may mean that other projects and plans should be screened in to the in-combination assessment.</p>	<p>JNCC</p>	<p>The in-combination assessment has considered sites which were screened in for Stage 2 Appropriate Assessment for the Proposed Development in isolation, and therefore an in-combination assessment was only completed for Mers Celtiques Talus du golfe de Gascogne SPA.</p> <p>This SPA is a large area of marine habitat which is designated as it is used by large numbers of foraging birds from several species. As this site is not a breeding colony, no functionally linked habitat needs to be considered, and therefore the principle of using foraging ranges when screening projects and plans does not apply in this case.</p> <p>These points were clarified in a meeting with JNCC on 30 October 2024. JNCC confirmed (email 5 November 24) to this rationale and the cumulative method applied to this specific RIAA (recognising that other approaches may apply to other projects).</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Lundy SSSI	With reference to the PEIR (Volume 3, Chapter 9: Offshore Ornithology) Natural England's chief concern as the SNCB for England out to 12nm is the potential for impacts from vessel-related disturbance to seabirds from the Lundy SSSI. We welcome the commitment to discuss an appropriate mitigation strategy and recommend that this discussion is had well in advance of submission, so there is time to reach agreement on how best to reduce impacts in sea areas of value to foraging and aggregating seabirds to acceptable levels.	Natural England	<p>A follow up meeting to discuss Lundy was held with Natural England on 12 August 2024, at which a detailed analysis of baseline vessel movements in the vicinity of Lundy was discussed. The baseline vessel movements provide a context for the proposed vessels associated with the Proposed Development.</p> <p>Natural England agreed that the additional disturbance which would arise from the Proposed Development was not significant, and that additional mitigation would not be required. This was confirmed via email, dated 19 September 2024. Details on baseline shipping movements across the entire OCC is available within Volume 3, Chapter 5: Shipping & Navigation of the ES (Document Ref: 6.3.5).</p>	N
Physical processes				
Sediment chemistry samples - intro	Within the assumptions and limitations section of the assessment (paragraph 8.4.26 of volume 3, chapter 8 of the PEIR) it states that no chemical characterisation is provided from the 51 sediment grab sample stations (including metals, organotins, hydrocarbon content, or polychlorinated biphenyls ("PCBs")) which are typically expected to be included within a sediment contaminant analysis suite for comparison to Cefas Action Levels because "the data are not intended to support a sediment disposal licence but rather to provide a general indication of offshore sediment contamination status: thus the suite of analysis is deemed appropriate".	MMO	Noted. See response to 'Sediment chemistry samples - detailed' comment directly below in this table.	N

<p>Sediment chemistry samples - detailed</p>	<p>This type of data is required to be able to fully assess the potential risk and impact from the release of contaminants into the marine environment as a result of the proposed development. If there are samples where the particle size analysis (“PSA”) indicates that the material is not coarse, these samples should be analysed to be able to determine the potential risk from the release of contaminants appropriately. The MMO recognises that analysis of sand pebbles and slate chippings is not possible and that fine sands would be a lower risk, however, where there are samples with fines, these should be analysed, e.g. Bideford Bay. The analysis of samples, particularly inshore near Bideford Bay, should include the analysis of a minimum of the primary list of OSPAR chemicals (OSPAR Agreement 14-06e). In addition, analysis should include the sum of 25 congeners not just the ICES 7 for PCBs and the analysis of organotins (Dibutyltin and Tributyltin), as suggested for the contaminant analysis of dredge material in the MMO’s sediment sampling and analysis guidance</p>	<p>MMO</p>	<p>An initial meeting with the MMO took place on 17 October 2024 to discuss the MMO Section 42 comments, including detailed discussion on the extent of the baseline sediment chemistry characterisations. A subsequent meeting was held with Cefas as MMO’s technical advisors on 8 November 2024 to further discuss the existing sediment chemistry characterisations and analysis methods used by the laboratory when testing baseline grab samples.</p> <p>The key outcomes of this meeting are summarised below:</p> <ul style="list-style-type: none"> • The EIA characterisations of e.g. sediment types (in particular particle size, and organic concentrations), current movements, and sediment dispersal potential along the Offshore Cable Corridor, provide a detailed background and context for consideration of chemical contamination risk. In other words decision making (regarding chemistry considerations) benefits from a detailed understanding of the context, and the risk of contamination along the Offshore Cable Corridor is in general low. • The particle size analysis laboratory methods were confirmed to be consistent with MMO method recommendations (undertaken using approved laboratory and appropriate methods). • The chemistry analyses were undertaken using an appropriate MMO approved laboratory, however in places the methods were not precisely as recommended by MMO guidance (MMO, 2018) <ul style="list-style-type: none"> ○ It was noted that the metals analysis was undertaken using strong acid digest, which in-effect constitutes a precautionary approach. Cefas noted that this is acceptable. They also noted that they would have expected the laboratory to report zinc. Post meeting, further 	<p>N</p>
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			<p>interpretation of the original metals analysis has been commissioned to extract zinc data, which will be presented as supplementary information (post DCO application). Cefas noted that 2010 data from a capital dredge at Appledore Shipyard inside the Torridge Estuary, found zinc data of 72 mg/kg (well below AL1). Levels in Bideford Bay would be expected to be lower and considering the low Total Organic Carbon levels, zinc is not expected to be elevated or of concern (with regards marine licensing implications).</p> <ul style="list-style-type: none"> ○ Analysis for organotin compounds was omitted from the sediment analysis. Following the meeting, the laboratory has confirmed that sample volume has been retained and samples stored in amber glass jars and kept frozen. Cefas noted that it would be worth retesting them even though it is outside of the standard holding time window (note, analysis has been commissioned post meeting). TBT concentrations from the Appledore dredge samples (desk based background data) were found to be 0.077 mg/kg and 0.002 mg/kg (below AL1) and concentrations would be expected to have further reduced in recent years given the effects of the TBT ban. Thus organotins are not expected to be elevated or of concern (with regards marine licensing implications) ○ Analysis for PCBs was previously omitted from the sediment analysis. In the light of the low levels of fines and Total Organic Carbon recorded, and the absence of any sources past 	
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			<p>or current posing a high risk of PCB releases, it was suggested that risk of PCB contamination is low, and if necessary (on account of sample volume) TBT analysis should be prioritised (post meeting organotin analysis commissioned – dependent on sample volume). Cefas stated that retesting is acceptable subject to the same criteria being met as for TBT, i.e. samples have been stored frozen, in the dark, in glass containers and not thawed out frequently. Following the meeting, the laboratory has confirmed that samples have been retained in amber glass jars and kept frozen. PCBs are not expected to be elevated or of concern (with regards marine licensing implications).</p> <ul style="list-style-type: none"> ○ Cefas agreed that any chemical re-analysis of samples could focus on the Section 1 (Bideford Bay) samples only, as this is the zone with the highest proportion of fines, the greatest potential for transport (transport of any disturbed sediments – as confirmed by sediment dispersal assessments in Volume 3, Appendix 8.1: Sediment source concentrations and assessment of disturbance, of the ES (Document Ref: 6.3.8.1), and the greatest potential for inshore historic contaminant inputs from the Taw/Torridge Estuary. ○ The analyses of PAHs, TPHs and TOC were discussed, with no additional testing recommended (Cefas confirmed). <p>In summary, following review of the laboratory sediment chemistry data (which in places did not employ testing methods recommended by MMO guidance), it was agreed, that with targeted additional testing of the retained samples</p>	
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Topic	Summary of comments	Body	Response	Design change (Y/N)
			<p>(to provide additional validation data and increase confidence) the dataset would be sufficient to support marine licensing. The current data are thus deemed suitable for the purposes of the ES (Volume 3, Chapter 8: Physical Processes (Document Ref: 6.3.8)).</p> <p>The supplementary data will be provided and discussed with Cefas/MMO beyond the date of submission for DCO (beyond finalisation of this ES chapter) but prior to any issue of an associated Deemed Marine Licence.</p>	
<p>Sediment chemistry results</p>	<p>In paragraphs 8.9.23 to 8.9.27, the PEIR then states that the 51 sediment grab samples were analysed for metals, organotins and polycyclic aromatic hydrocarbons (“PAHs”) and compared to Cefas Action levels. The sediment sample chemistry results provided in volume 3, appendix 8.3 show levels of trace metals including arsenic, PAHs and total organic carbon. Levels of the contaminants provided in appendix 8.3, such as mercury, only show the results to one decimal place. For mercury and cadmium, the MMO recommends displaying results to at least two decimal places.</p>	<p>MMO</p>	<p>The precision of the sediment chemistry data is improved in the ES - Volume 3, Appendix 8.3: Sediment Sample Chemistry Results of the ES (Document Ref: 6.3.8.3).</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Sediment chemistry samples</p>	<p>Details of the laboratory which undertook the sample analysis have not been provided within the PEIR. This means that there is no information on the extraction and analysis methods used to derive the data. To be able to be confident in the data provided, the name of the laboratory and the methods used must be provided. Please also note that the MMO are unable to accept sediment analysis undertaken by a non MMO validated laboratory to support either a marine licence application, or a marine licence to be deemed within a development consent order application. Please see the MMO's sediment sampling and analysis guidance for further information</p>	<p>MMO</p>	<p>An initial meeting with the MMO took place on 17 October 2024 to discuss the MMO Section 42 comments, including detailed discussion on the extent and nature of the baseline sediment chemistry characterisations. A subsequent meeting was held with Cefas as MMO's technical advisors on 8/11/24 to further discuss the existing sediment chemistry characterisations and analysis methods used by the laboratory when testing baseline grab samples.</p> <p>A technical note was provided to Cefas ahead of the 8 November 2024 meeting setting out the laboratories used for the baseline testing and the laboratory testing methods utilised, with detailed discussions held at the meeting (8 November 2024). To confirm, MMO approved laboratories were used for relevant testing. See detailed response to the 'Sediment chemistry samples - detailed' comment above in this table, for further detail regarding the testing undertaken, and agreed actions.</p> <p>Where supplementary testing was agreed, this will be provided and discussed with Cefas/MMO beyond the date of submission for DCO (beyond finalisation of the ES chapter) but prior to any issue of an associated Deemed Marine Licence.</p> <p>The current data are deemed suitable for the purposes of the ES (Volume 3, Chapter 8: Physical Processes (Document Ref: 6.3.8)).</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Sediment chemistry thresholds</p>	<p>The MMO notes that paragraph 8.5.44 of the PEIR makes a comparison of contaminant levels observed in OSPAR Commission, 2000 data for heavy metals, hydrocarbons and PCBs and the Interim Quality Status Report (OSPAR 2017) data for metals, hydrocarbons and PCBs, to Cefas Action levels. However, methods used to derive results for the assessment of heavy metals are different to the methods used for determination of levels of contaminants in proposed dredge material that are compared to Cefas Action levels. Therefore, the OSPAR offshore data cannot be compared to Cefas Action levels.</p>	<p>MMO</p>	<p>Noted. The threshold comparisons in the PEIR were conflating different data types and thus made in error. These comparisons have been removed from the ES (Volume 3, Chapter 8: Physical Processes (Document Ref: 6.3.8)).</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Sediment disturbance</p>	<p>The PEIR determines that there is potential for sediment to travel a maximum of 3.9 km during peak spring tides, whilst concentrations are currently unknown, the volumes of dispersed sediment are likely to be generally small given the small scale and transient nature of the activities at any one location. The risk is estimated from a height and width of sand waves and no estimated volumes of the disturbed material are provided to support the applicant's comments. Within the ES, the MMO would expect to see an estimate of the disturbed sediment volume for each activity of the proposed development.</p>	<p>MMO</p>	<p>Following detailed review of environmental survey data, the Outline Cable Burial Risk Assessment which is provided as an application document in Volume 1, Appendix 3.4 of the ES (Document Ref: 6.1.3.4) now confirms that there is no requirement for broadscale sandwave levelling. In other words there is no 'pre-sweeping' required in UK waters and all anticipated sandwaves are small enough to enable e.g. conventional jetting to bury below the non-mobile reference layer.</p> <p>Indicative burial methods figures (risk to relevant burial methods) are now provided in the ES (Volume 1, Figures 3.12, 3.13 and 3.14) and also in the context of benthic habitats (Volume 3, Chapter 1, Figure 1.15 to Figure 1.19).</p> <p>The updated Sediment Dispersion Technical Note (Volume 3, Appendix 8.1: Sediment Dispersion Technical Note of the ES (Document Ref: 6.3.8.1)) updates the maximum sediment dispersal distances following incorporation of potential secondary wave action (in addition to site specific currents).</p> <p>The Technical Note in Volume 3, Appendix 8.1 of the ES (Document Ref: 6.3.8.1) also includes indicative volumes of sediment disturbed and then a number of quantitative and qualitative estimates and discussions regarding deposition of disturbed sediment at different points along the OCC.</p> <p>The Marine Conservation Zone (MCZ) assessment (Document Ref: 7.15) and Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1) presents an impact assessment of sediment deposition / smothering effects on benthic habitats and species. The assessment approach regarding smothering effects, including with specific reference to MCZ features, has been discussed within direct consultations with JNCC and Natural England.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Sediment scour	The extent and location of cable protection has been initially estimated to be along 150 km of the cable route. Secondary scour from the cable protection in zones where the sediment thickness is only 1 m may be an issue when the 'base layer' is exposed. The impacts of secondary scour should be considered in the ES.	MMO	Updated sediment dispersal technical note (Volume 3, Appendix 8.1: Sediment source concentrations and assessment of disturbance of the ES (Document Ref: 6.3.8.1)) now also now includes high level quantitative scour assessment. Further updates have also been made to the sediment dispersion assessment to include qualitative analysis of likely sediment disturbance volumes.	N
PSA	While particle size information has been obtained from grab samples, the particle size regime is not known at the maximum depth of the plough/leveller or the mass flow excavation ("MFE") to be used to flatten sand waves or large ripples. This should be included in the ES.	MMO	Following discussion at the MMO/Cefas meeting on 8 November 2024, further interrogation of the Cone Penetration Testing (CPT) logs was carried out with a summary presented in the updated Sediment Dispersion Technical Note (Volume 3, Appendix 8.1: Sediment Dispersion Technical Note of the ES (Document Ref: 6.3.8.1)). Comparison of CPT results at the surface compared to the maximum penetration depth, provides confidence in the general homogeneity of the sediments from seabed level down to maximum trenching depth. Therefore the sediment classifications (e.g. particle size classifications) and the chemical characterisations associated with sediment grab samples are considered suitable to represent the marine sediments across the full depth of potential Proposed Development disturbance. See Volume 3, Appendix 8.1: Sediment Dispersion Technical Note of the ES (Document Ref: 6.3.8.1) for further details.	N
Sediment disturbance	Table 8.32 shows sediment dispersion results. The methodology used to calculate the maximum distance travelled by a suspended sediment plume needs to be explained further in the ES as it is not made clear in the PEIR.	MMO	The sediment dispersion technical note has been updated (Volume 3, Appendix 8.1: Sediment source concentrations and assessment of disturbance of the ES (Document Ref: 6.3.8.1)). The updated assessment includes secondary influence of waves in addition to max (peak spring) current transport.	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Approach to assessment</p>	<p>In formulating comments on Physical Processes, the following documents have been considered:</p> <ul style="list-style-type: none"> • Volume 3 Chapter 8 Physical Processes • Appendix 8.1 Sediment Dispersion • Appendix 8.2 Wave & Tidal Conditions • Appendix 8.3 Sediment Sample Chemistry • Appendix 8.4 GEOxyz Environmental Report • Volume 1 Chapter 3 Project description 	<p>Natural England</p>	<p>Noted.</p>	<p>N</p>
<p>Approach to assessment</p>	<p>With respect to Physical Processes, Natural England advises that best practice has not been followed and refers the Applicant to JNCC & NE's subsea cable best practice advice.</p>	<p>Natural England</p>	<p>The JNCC and Natural England advice note has been used to inform the updated assessments for the ES (including Volume 3, Chapter 8: Physical Processes of the ES (Document Ref: 6.3.8)). The approach to the Physical Processes assessments, notably the methods around characterisation of sediment dispersal have been discussed with Natural England and other SNCBs throughout the EIA process, including discussions with the MMO and Cefas Physical Processes experts to inform the updated sediment dispersal technical note, which is presented as Volume 3, Appendix 8.1: Sediment Dispersion Technical Note of the ES (Document Ref: 6.3.8.1).</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Receptors	<p>Natural England agrees with the key receptors taken forward to assessment but would recommend amendments to be made to some of the descriptions of</p> <p>Receptors e.g. 'Surrounding sub-tidal sea bed' to refer specifically to seabed morphology as well.</p> <p>We also advise the amendment of the description of 'Surround coastline' to include consideration of shore platform downwearing/ damage and coastal retreat.</p>	Natural England	<p>The descriptions of the sub-tidal seabed and surrounding coastline have been amended as per Natural England request. Refer to Volume 3, Chapter 8: Physical Processes of the ES (Document Ref: 6.3.8).</p>	N
Scour	<p>Natural England advises that cable exposures and/or cable protection measures could result in scour (or secondary scour) and changes to sediment processes and seabed morphology. Therefore 'sediment disturbance or seabed change' should remain scoped into the assessment for operational phase. This issue should also be considered further following the completion of the scour assessment in the updated Physical Processes chapter in the ES.</p>	Natural England	<p>Sediment disturbance or seabed change has been scoped into the assessment for the operational and maintenance phase and has been considered further following the completion of the scour assessment. Refer to Volume 3, Chapter 8: Physical Processes of the ES (Document Ref: 6.3.8).</p>	N
Approach to assessment	<p>Natural England advises that Operation and Maintenance activities and their potential effects should remained scoped into the assessment for the lifetime of the development, including:</p> <ul style="list-style-type: none"> • Cable repair and maintenance • Cable remedial burial • Maintenance of external cable protection • New external cable protection 	Natural England	<p>Cable repair and maintenance, cable remedial burial, maintenance of external cable protection and new external cable protection have been scoped into the assessment for the Operational and Maintenance phase of the Proposed Development. Refer to Volume 3, Chapter 8: Physical Processes of the ES (Document Ref: 6.3.8).</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Mitigation measures</p>	<p>With respect to Section 8.7, Natural England advises consideration (but not exclusively) is given to the following to inform potential mitigation measures:</p> <ul style="list-style-type: none"> • Cable burial risk assessment • Scour management and cable protection plan • Hierarchy approach – avoid minimise mitigate impacts on MPAs • Re-routing to avoid UXOs • Consideration of angles at which cables approach the coast and/or interact with sediment transport pathways • Consideration of cable crossing and aligning the route to minimise the number of crossings within sensitive areas. <p>Following exhaustion of avoidance and impact reduction, mitigation measures should be considered including, selection of cable protection material to match the receiving environment and that are recoverable and removable at decommissioning.</p>	<p>Natural England</p>	<p>An outline CBRA (Document Ref: 6.1.3.4) is presented as Volume 1, Appendix 3.4 of the ES.</p> <p>A specific scour management and cable protection plan has not been prepared on the basis that it is deemed unnecessary, based on the expectations of the CBRA and the results of the scour assessment within Volume 3, Appendix 8.1: Sediment Source Concentrations and Assessment of Disturbance of the ES (Document Ref: 6.3.8.1). Note, operational and maintenance phase surveys will be undertaken regularly and thus allow any areas of local scour to be identified.</p> <p>A hierarchy approach has been adopted to development of Proposed Development mitigation, principal to which is avoidance. MPAs have been avoided where possible. The only MPA that is crossed is the Bristol Channel Approaches SAC which cannot be avoided for any landfall location across this part of the south-west.</p> <p>UXO survey, removal (if required), and associated licensing will be undertaken separate to this ES (as agreed during consultation with the MMO).</p> <p>The potential impact on geomorphology processes have been assessed in Volume 3, Chapter 8: Physical Processes of the ES (Document Ref: 6.3.8).</p> <p>As above the Offshore Cable Corridor route has avoided MPAs where possible. Location of crossings relative to habitats (all habitats not just protected habitats) is presented in Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1).</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Cable burial risk assessment	Natural England notes that a Cable burial risk assessment (CBRA) is not mentioned in the chapter and requests assurances that the detailed CBRA is included at a later date, which includes assessment of potential cable exposure.	Natural England	An outline CBRA (Document Ref: 6.1.3.4) is provided in the ES (Volume 1, Appendix 3.4), as part of the application for DCO.	N
Sediment disturbance	Natural England welcomes the high-level assessment of sediment disturbance. Natural England advises that the next step is for this study to be taken further to assess the worst-case scenario in terms of maximum sediment plume concentration, extent and persistence, as well as associated changes in bed level (i.e. deposition footprint). It is important to present this information to show potential impacts to relevant MPAs, sensitive features, habitats and physical process receptors.	Natural England	A maximum sediment plume extent, suspended sediment concentration uplifts associated with disturbance activities, and associated changes in bed level (averaged across the plume extent) are included within Volume 3, Appendix 8.1: Sediment Source Concentrations and Assessment of Disturbance of the ES (Document Ref: 6.3.8.1). The disturbance assessment has been developed since PEIR stage to increase the level of detail and the associated robustness of the outputs; the assessment now includes consideration of secondary wave effects, in addition to consideration of site specific currents (and sediment particle size).	N
Seabed mobility assessment	Natural England welcomes the high-level assessment of potential sediment mobilisation and dispersion. However, a more detailed seabed mobility assessment should be completed.	Natural England	A more detailed seabed mobility assessment has been completed as part of Volume 3, Appendix 8.1: Sediment Source Concentrations and Assessment of Disturbance of the ES (Document Ref: 6.3.8.1). The disturbance assessment has been developed since PEIR stage to increase the level of detail and the associated robustness of the outputs; the assessment now includes consideration of secondary wave effects, in addition to consideration of site specific currents (and sediment particle size). The assessment scope has benefited from consultations with the SNCBs and discussions with the MMO and Cefas Physical Processes technical experts throughout the ES stage.	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>External cable protection</p>	<p>Natural England highlights that the best case is that the cable remains buried and that no external cable protection is required.</p> <p>In a mobile environment, reaching the non-mobile reference level using pre-sweeping or sandwave levelling methods is likely to facilitate the burial activity. However, the impact of sandwave clearance needs to be assessed. There is no map showing where it is anticipated sandwave levelling and external cable protection will be required. The map should include:</p> <ul style="list-style-type: none"> • Specific locations • Total area of impact (both direct and indirect) • Habitats impacted • Presence of sensitive habitats • Total volume of dredged material • Nature of material e.g. particle size • Disposal site information (including quantities, method and location) 	<p>Natural England</p>	<p>The Outline CBRA (Document Ref: 6.1.3.4) is presented as part of the ES in Volume 1, Appendix 3.4. A series of CBRA related maps and associated potential habitat disturbance calculations (interaction between different construction methods and habitats) are also presented within the ES. Note, the precise tools used at any one location cannot be guaranteed until installation conditions are encountered, however the risk assessments provide a good indication of the likely tools to be used. Note, review of the CBRA now confirms (at ES stage) that there are no large sandwaves in UK waters that require pre-sweeping / sandwave levelling; the sandwaves are generally small enough to enable e.g. conventional jetting to bury below the non-mobile reference layer.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Seabed preparation works</p>	<p>Natural England requests further information is provided on seabed preparation works, regarding pre-lay grapnel run:</p> <ul style="list-style-type: none"> • Location • Total area of impact (both direct and indirect) • Habitats impacted • Presence of sensitive habitats • Area of MPA affected • MDS seabed impacts should also be considered for UXO clearance. 	<p>Natural England</p>	<p>The Outline CBRA (Document Ref: 6.1.3.4) is presented as part of the ES in Volume 1, Appendix 3.4. A series of CBRA related maps and associated potential habitat disturbance calculations (interaction between different construction methods and habitats) are also presented within the ES (Volume 3, Figure 1.15 to Figure 1.19). It is currently envisaged that the pre-lay grapnel run will extend along the whole route apart from at the live crossings (ES includes maps of in-service crossing locations e.g. Volume 3, Figure 1.14, which also displays designated sites) and the characteristics of the grapnel set out in the Project Description (Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3)). The only exception will be if the cable is installed by pre-cut trenching by plough when pre-lay grapnel run would not be required, but this level of detail is currently not known. For EIA purposes the pre-lay grapnel run does not represent the maximum disturbance construction activity as the total width of the grapnel is c.1m i.e. less than e.g. the trenching ROV.</p> <p>Note UXO clearance where required would be undertaken under separate marine licensing, as advocated by the MMO.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Boulder clearance</p>	<p>With regards to the Project Description (Reference 3.8.43), further information is requested on boulder clearance, including:</p> <ul style="list-style-type: none"> • Specific locations (informed by acoustic data) • Methods used for boulder removal • Total area of impact (including where the boulders will be placed/removed from) • Habitats impacted • Presence of sensitive habitats • Disposal within areas with similar bedforms 	<p>Natural England</p>	<p>The Outline CBRA (Document Ref: 6.1.3.4) is presented as part of the ES in Volume 1, Appendix 3.4. A series of CBRA related maps and associated potential habitat disturbance calculations (interaction between different construction methods and habitats) are also presented within the ES (Volume 3, Figure 1.15 to Figure 1.19). Boulder density maps are presented which are indicative of the boulder clearance locations (see Volume 1, Figure 3.11: Boulder densities along Offshore Cable Corridor which accompanies the Project Description in the ES). Boulder clearance is likely to be undertaken by a combination of grapple in areas of low boulder density or by boulder clearance plough in areas of high boulder density. The use of the tools may be swapped due to operational requirements, for example a small area of low density boulders may be cleared by plough if between areas of high density boulder fields or vice versa.</p> <p>Following discussions with Natural England and JNCC the Proposed Development has made the following commitment (Volume 1, Appendix 3.1: Commitments Register of the ES (Document Ref: 6.1.3.1)):</p> <p style="text-align: center;"><i>All construction activities undertaken on the seabed including boulder clearance activities (inclusive of the depositing of moved boulders) will remain entirely within the Offshore Cable Corridor, and a minimum distance of 20 m from any Marine Conservation Zone boundary.</i></p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Bedform	<p>Natural England notes that bedform is mentioned to be across much of the survey area. The PEIR, Volume 3, Appendix 8.4: GEOxyz Environmental Report, Section 4.2 discusses Seabed Features identified using reconnaissance survey data coupled with BGS information. Figures 5-8 in this report present ten 'representative' sections of the route showing interpreted seabed features along the UK route survey area. It also states that the 'full interpreted seabed features will be described and displayed within the 'Draft Geophysical Survey Interpretation Report'.</p> <p>Natural England would want to see the form and extent of mobile bedforms and a map showing the location of these.</p>	Natural England	Refer to Volume 3, Figure 8.10: Seabed Features of the ES which shows the form and extent of mobile bedforms.	N
Further information request – sediment transport pathways	Natural England advises sediment transport pathways within the study area should be considered and included on a map, especially those closer to landfall.	Natural England	Sediment transport pathways have been considered within Volume 3, Appendix 8.1: Sediment Source Concentrations and Assessment of Disturbance of the ES (Document Ref: 6.3.8.1), which includes maps showing maximum spring tide (worst case) and neap tide sediment transport pathways for Section 1 of the Offshore Cable Corridor within Bideford Bay (inner Bay).	
Further information request – Cofferdams	Natural England advises consideration should be given to whether cofferdams may be required for the HDD exit pits and any impacts on the coastal/nearshore processes.	Natural England	There is no requirement for cofferdams at the HDD exit pits.	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Further information request – beach access</p>	<p>Natural England advises consideration should be given to whether access will be required to the beach/foreshore/shore platform and how that will be achieved and any likely impacts.</p>	<p>Natural England</p>	<p>There are no proposed activities (or associated access requirements) on the beach/foreshore/shore platform. In the event that emergency access is required to the Public Right of Way at the beach/foreshore, access will be managed in accordance with the Public Right of Way Management Plan, developed in accordance with the Outline Public Right of Way Management Plan (Document Ref: 7.11) as part of the DCO.</p>	<p>N</p>
<p>HDD</p>	<p>Natural England requests that a figure showing where HDD will be used including exit pit locations is included within the Application as well as additional methodology for any of the remaining length that cannot be achieved by HDD. This should be clearly identified in order to ascertain the impact.</p>	<p>Natural England</p>	<p>Refer to Volume 1, Figure 3.9: Indicative Landfall HDD Exit Locations, of the ES which shows the landfall HDD location plan – noting that there is flexibility remaining for the micrositing of the HDD exit locations.</p> <p>The geotechnical feasibility for the HDD was confirmed in an independent HDD feasibility report by LMR Drilling UK in 2023, which included detailed HDD method statements. Note the feasibility considerations (including geotechnical technical feasibility) were directly informed by the completion of the HDD for the outfall of the Cornborough Sewage Treatment Scheme undertaken at the same site location, by LMR Drilling UK Ltd. in 2002. Thus the geotechnical feasibility is well known and feasibility confidence is high. The assessed area extends beyond the anticipated exit points, and therefore it is not envisaged that there will be any remaining length that cannot be achieved by HDD. None of the alternative landfall methods are considered appropriate for use in the context of the geological SSSI.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
HDD	<p>Natural England advises, that for HDD to be considered as viable, pre-consent geotechnical investigations are required to confirm what is achievable. We would like to highlight that another methodology may need to be considered.</p> <p>Natural England advises that geotechnical surveys should be undertaken to demonstrate the feasibility of HDD and recommend that an alternative methodology is assessed upfront, in case HDD is unviable, to reduce the likelihood of delays further down the line.</p>	Natural England	<p>Noted that Natural England welcomes the commitment to undertake HDD to avoid sensitive habitats at the landfall.</p> <p>The geotechnical feasibility for the HDD was confirmed in an independent HDD feasibility report by LMR Drilling UK in 2023, which included detailed HDD method statements. Note the feasibility considerations (including geotechnical technical feasibility) were directly informed by the completion of the HDD for the outfall of the Cornborough Sewage Treatment Scheme undertaken at the same site location, by LMR Drilling UK Ltd. in 2002. Thus the geotechnical feasibility is well known and feasibility confidence is high. None of the alternative landfall methods are considered appropriate for use in the context of the geological SSSI.</p>	N
HDD	<p>Natural England highlights that the exit pits for Nemolink were located within a saltmarsh feature, and the habitat has not since recovered. We therefore advise against any exit pits within saltmarsh or other sensitive habitats from our experience on this and several other projects.</p> <p>Exit pits should avoid designated sites where possible and should not be located within an intertidal/coastal designated site feature. The location of any required exit pits would need to be defined and included in any assessment. NE advise that more evidence and confidence of the location of the exit pits as well as the proposed route/length of HDD is provided.</p>	Natural England	<p>The HDD exit pits will not be located in designated or sensitive habitats. Maps showing the HDD exit pit locations (enveloped locations) are provided in Volume 1, Figure 3.9: Indicative Landfall HDD Exit Locations of the ES. HDD exit pits would be located between 5 m Lowest Astronomical Tide (LAT) water depth (c.500 m offshore) and 10 m LAT water depth (c.1800 m offshore). The associated minimum length of HDD from onshore entry to offshore exit pit is 672 m; the associated maximum length of HDD from onshore entry to offshore exit pit is 2,110 m.</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Exit pits</p>	<p>Natural England highlights that exit pits may be problematic at depths shallower than 10m water depth, especially if cable protection is required. We advise that this protection is included in the assessment.</p>	<p>Natural England</p>	<p>Following installation, cable ducts at the exit pits will be protected using the material excavated from the 'exit pit'. If concrete mattresses or rock protection are needed at the final duct exits this will be highly localised and all such protection would be below seabed level. Assessment of geomorphological change at the exit pits is considered within Volume 3, Chapter 8: Physical Processes of the ES (Document Ref: 6.3.8), which concludes no significant effects. Elsewhere within Bideford Bay there is no expectation or intention to deploy rock for normal cable protection.</p>	

<p>South West Approaches to Bristol Channel MCZ</p>	<p>Natural England advises that although the South West Approaches to Bristol Channel MCZ will not be directly intersected, the close proximity of the cable corridor to this designation is a concern. The overarching conservation objectives for the site is for its designated feature either to remain in or reach favourable condition.</p> <p>Cable routes can change significantly throughout the planning process, so it is important that the surveyed cable corridor is sufficiently wide enough to cover any potential changes in routing as well as allowing for micro-siting where required. 1km is generally acceptable, however 500m has been considered for the majority of the cable corridor with 2 x 2 bundled cables and corresponding trenches with 50-100m spacing distance, this doesn't leave much space for necessary changes and micro-siting.</p> <p>Natural England advises that an MCZ Assessment is required in order to understand any impacts to the subtidal coarse sediment and subtidal sand in the South West Approaches to Bristol Channel MCZ.</p> <p>Due to the proximity of the cable corridor to the MCZ, pressures such as smothering/increase in suspended solids need to be carefully considered against the sensitivity of any features within the MCZ assessment. A wider cable corridor may be required alongside the South West Approaches to Bristol Channel MCZ to allow for microrouting.</p>	<p>Natural England</p>	<p>A preliminary MCZ assessment was provided to Natural England, JNCC and the MMO on 30 July 2024. A final MCZ assessment (Document Ref: 7.15) is provided with the ES assessment. The key findings of the MCZ assessment were presented to Natural England and JNCC on 30 October 2024.</p> <p>One of the protected features of the South West Approaches to Bristol Channel MCZ (Subtidal coarse sediment) was screened in to further assessment for the impacts 'changes in suspended solids' and 'smothering and siltation rate changes'. Stage I assessment concluded that effects of 'changes in suspended solids (water clarity)' and 'smothering and siltation rate changes (light)' on subtidal coarse sediment were anticipated to be insignificant. A key basis for this conclusion was the outputs of the preliminary sediment transport modelling included in Volume 3, Chapter 8: Physical Processes of the ES (Document Ref: 6.3.8) and Volume 3, Appendix 8.1: Sediment source concentrations and assessment of disturbance of the ES (Document Ref: 6.3.8.1)) which indicated dispersal of sediment is anticipated to be very limited (tens to hundreds of metres) along the section of the offshore cable corridor adjacent to the South West Approaches to Bristol Channel MCZ. Proposed development activities would be temporary and transient, and any sediment released into the water column will be rapidly dispersed in the water column likely rapidly reaching background levels at or before reaching the MCZ. In addition, MarLIN sensitivity assessments for different circalittoral coarse sediments (the HOCI considered within the MCZ assessment), generally indicate that they have 'low sensitivity' to changes in suspended sediments and smothering and siltation rate changes, or are indicated as being not sensitive to these impacts.</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
			<p>It can be confirmed that both bedrock reef and stony reef were not identified within the Offshore Cable Corridor adjacent to the South West Approaches to Bristol Channel MCZ (Volume 3, Figures 1.12 and 1.13 of the ES). Therefore, there is not anticipated to be a requirement for microrouting around Annex I habitats in the vicinity of the South West Approaches to Bristol Channel MCZ.</p> <p>Following discussions with Natural England and JNCC the Proposed Development has made the following commitment (Volume 1, Appendix 3.1: Commitments Register of the ES (Document Ref: 6.1.3.1)):</p> <p><i>All construction activities undertaken on the seabed including boulder clearance activities (inclusive of the depositing of moved boulders) will remain entirely within the Offshore Cable Corridor, and a minimum distance of 20 m from any Marine Conservation Zone boundary.</i></p>	

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Biotope</p>	<p>With reference to Appendix 8.4, Natural England highlights that it is unclear whether grabs were completed in each broad level biotope found along the cable corridor. If this is not the case, grab samples should be taken within each type of biotope along the cable route.</p>	<p>Natural England</p>	<p>Seven habitat types which intersect with the Offshore Cable Corridor (OCC) are not covered by the grab samples. However, the area of these habitat types is small in relation to the area of the OCC (see list of habitats below which were not covered by the grab sampling). Additionally, five of the seven habitats are rocky habitats and grabs are not suitable for sampling these rocky habitats. Consequently, based on the extremely small percentages of these habitat types in the OCC it is considered the site characterisation data obtained based on the surveys conducted to date is sufficiently robust to effectively inform the assessment. These data were presented and discussed with Natural England during direct consultations.</p> <p>Hard substrate habitats</p> <p>A4.27: Faunal communities on deep moderate energy circalittoral rock (4.46 ha) - 0.02% of OCC</p> <p>A4.2: Atlantic and Mediterranean moderate energy circalittoral rock (9.02 ha) - 0.04% of OCC</p> <p>A3.1: Atlantic and Mediterranean high energy infralittoral rock (5.63 ha) - 0.02% of OCC</p> <p>A4.1: Atlantic and Mediterranean high energy circalittoral rock (0.27 ha) - 0.001% of OCC</p> <p>A4.33: Faunal communities on deep low energy circalittoral rock (0.30 ha) - 0.001% of OCC</p> <p>Mixed and soft substrate habitats</p> <p>A5.45: Deep circalittoral mixed sediments (341.68 ha) - 1.68% of OCC</p> <p>A5.23 or A5.24: Infralittoral fine sand or Infralittoral muddy sand (13.36 ha) - 0.07% of OCC</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Shipping and navigation				
Approach of assessment	The MMO recommends that a Navigational Risk Assessment be completed to ensure that potential impacts to shipping and navigation are appropriately mitigated.	MMO	A Navigational Risk Assessment is presented as Volume 3, Appendix 5.1 of the ES (Document Ref: 6.3.5.1).	N
Electromagnetic fields	The MCA requires a study to be undertaken to establish the electromagnetic deviation, affecting ship compasses of the high voltage cable route. This must demonstrate that there is no more than a 3-degree electromagnetic compass deviation for 95% of the cable route and for the remaining 5% of the cable route there must be no more than a 5 degree electromagnetic compass deviation. If the MCA requirement cannot be met, a post installation actual electromagnetic compass deviation survey should be conducted for the cable in areas where compliance has not been achieved.	MCA	<p>A review of the impacts associated with electromagnetic interference with compasses is presented in Section 9 of Volume 3: Appendix 5: Navigational Risk Assessment of the ES (Document Ref: 6.3.5.1). Due to the bundling of the cables, and the distance between the cables and vessels, there are not anticipated to be any effects on compass deviation.</p> <p>When final design engineering is complete, if it cannot be demonstrated that magnetic effects are within the required limits, a post lay compass deviation assessment will be carried out. This is included as a consent condition on the draft Deemed Marine Licence.</p> <p>Note, due to the bundling of the cables, and the distance between the cables and vessels, there are not anticipated to be any effects on compass deviation.</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Electromagnetic fields</p>	<p>The applicant has confirmed that the compass deviation effects will be minimised through cable design and burial, and separation distance between the two trenches. A compass deviation assessment will be undertaken post-consent, once the detailed design and cable configuration is available, to confirm interference with magnetic position fixing equipment is within acceptable limits. If it cannot be demonstrated that MCA deviation requirements can be met pre-construction, a post-construction compass deviation survey of the 'as laid' Offshore Cable Corridor will be undertaken.</p> <p>The MCA will therefore expect a condition of consent to ensure confirmation is provided for the compass deviation which details the arrangements for the bundling etc. and confirms that the magnetic effects will be within our required limits. If this then can't be achieved, a compass deviation assessment post lay would be required and included as a condition of consent.</p>	<p>MCA</p>	<p>A review of the impacts associated with electromagnetic interference with compasses is presented in Section 9 of Volume 3: Appendix 5: Navigational Risk Assessment of the ES (Document Ref: 6.3.5.1). When final design engineering is complete, if it cannot be demonstrated that magnetic effects are within the required limits, a post lay compass deviation assessment will be carried out. This is included as a consent condition on the draft Deemed Marine Licence.</p> <p>Note, due to the bundling of the cables, and the distance between the cables and vessels, there are not anticipated to be any effects on compass deviation.</p>	<p>N</p>

Table J-1.2 below sets out responses to the statutory consultation from consultees under s42(1)(a) of PA 2008 concerning onshore elements of the Proposed Development and the regard had to them by the Applicant. It should be read in conjunction with Section 7.2 of the Consultation Report (Document Ref: 5.1)

Table J.1.2 - Onshore: Summary of Section 42(1)(a) responses and regard had by topic

Topic	Summary of comments	Body	Response	Design change (Y/N)
Alternatives and need				
Overall view of proposal	Majority support for the proposal.	Parkham Parish Council.	This is noted.	N
Energy security	There was a general comment that generating power outside the UK was a risk to the UK energy security. The Chair said that she had read that solar panels in desert areas become wet with condensation and can be covered by wind blown sand reducing the efficiency.	Littleham and Landcross Parish Council	<p>A lot of power is already imported into the UK, including 20% of electricity demand in in Q2 2024.</p> <p>This Proposed Development can bring clean reliable power to the UK, on a dedicated supply, with the involvement of Morocco, a long-standing UK partner. Morocco has become, over the last 10 years, an international leader in renewable energy. And while we believe that we should maximise the UK's domestic renewables opportunity, a more diverse mix of reliable, affordable and green power is key to keeping the UK running in the coming years as our energy system, transport and homes become increasingly electrified, and demand for electricity continues to grow.</p> <p>The Proposed Development is needed so that the Project's international generation assets can enable an energy system that meets the Government's objectives to create a secure, reliable, and affordable energy supply for consumers to security of supply. Aggregated generation output from wind, solar, and storage is more predictable, less variable, and more flexible than output from a single generation technology, providing security and reliability of supply benefits for consumers.</p> <p>The power generated as part of the Project would complement the energy we already generate from the sun and wind in the</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
			<p>United Kingdom. When domestic renewable energy generation in the UK drops due to low winds and short periods of sun, the Project can provide access to the benefits of long hours of sun and consistent winds in Morocco to provide a firm but flexible source of zero-carbon electricity.</p> <p>The inclusion of a 22.5GWh/5GW battery facility in Morocco means this energy would be reliably available when it's most needed in Great Britain. The Morocco-UK Power Project will be an important contributor to a well-balanced grid. The Project offers an international solution to bringing forwards decarbonisation, energy security, and affordability benefits also ascribed to nationally significant infrastructure. Those Project benefits will not be delivered unless the Proposed Development is delivered. Therefore, the Proposed Development is needed.</p> <p>To the point regarding the solar panels themselves, we expect and are planning to carry out regular maintenance on the panels to address any impact of sand and condensation and will have monitoring systems in place to determine optimum efficiency. This is complemented by the fact that Morocco is sunnier and drier than the UK, meaning that the same amount of electricity can be generated with a third fewer panels than a project of equivalent capacity would require in the UK.</p> <p>This natural advantage will help outweigh inefficiency.</p>	

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<p>Cumulative effects</p>	<p>It was questioned that the cables did not link in with the wind turbine project (Whitecross) off the coast near Braunton. The Council also were surprised that the cables were not brought up the Torridge river.</p>	<p>Littleham and Landcross Parish Council</p>	<p>The Applicant understands that White Cross Wind Farm is proposed to connect into East Yelland substation and requires a 33kV/132kV connection to the national grid. The Proposed Development requires a 400kV connection which is why East Yelland is not suitable as a connection point without significant upgrades to the East Yelland substation and new 400kV overhead lines (OHL) to connect to the national grid. The site selection and assessment of alternatives process undertaken by the Applicants has been outlined within Volume 1, Chapter 4: Need and Alternatives of the ES (Document Ref: 6.1.4) and the Project Development and Consideration of Options (Annex 2 of the Planning Statement).</p> <p>The location at which the Proposed Development would connect into the National Grid has been informed by an assessment undertaken by the National Grid Electricity System Operator (NGESO) which identified the Alverdiscott Substation Site as the most appropriate location for the Proposed Development to connect into the National Grid. The Applicant undertook supplementary assessments (included as appendices to Volume 1, Chapter 4: Need and Alternatives (Document 6.1.4) to the NGESO assessment to confirm the Alverdiscott Substation Site was the most appropriate option. The NGESO and Applicant's assessments all included South Wales connection points in their assessments.</p> <p>The Applicant undertook an assessment of landfall options which is included in Volume 1, Chapter 4: Needs and Alternatives of the ES (Document Ref. 6.1.4)</p> <p>The assessment identified that an installation along the River Torridge could result in exposure of the cable due to the frequent movement of rivers sands within the estuary. We also note that the Environment Agency has raised concerns about the potential for the HVDC onshore cable to become exposed within due to erosion within the River Torridge. The River</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
			<p>Torrige HDD crossing is at substantial depth and so is not at risk of exposure. However, if the cable were to be trenched down the River Torridge to access Alverdiscott, it could be at risk of future exposure, noting it is not practicable to employ HDD for the full length of the River Torridge from the estuary entrance to the proposed cable crossing point.</p> <p>Installation within the River Torridge (without HDD) would also potentially cause significant impacts on protected migratory fish which use the river. Our proposed HDD crossing is at such a depth that it poses no risk to these migratory fish species.</p>	
<p>Need case</p>	<p>A comment was made asking if this type of project should be the first priority and there is a need to make it a statutory requirement for all new houses to have solar panels installed on the roofs and more research and funding into capturing sea and river tidal flows.</p>	<p>Littleham and Landcross Parish Council</p>	<p>As outlined in the Planning Statement (Document Ref: 7.2), Part 3 of National Policy Statement EN-1 establishes an indisputable and urgent policy need for all types of energy infrastructure in order to achieve energy security and dramatically reduce carbon emissions (NPS EN-1, paragraph 3.1.1). Part 3 also explains that, without significant amounts of new large-scale energy infrastructure, the Government's energy and climate change objectives cannot be fulfilled. The Proposed Development would make a contribution of this nature.</p> <p>Large-scale infrastructure should be seen as a complement, rather than an alternative to smaller-scale generation such as rooftop PV and maturing tidal technology. The National Energy System Operator (NESO) has identified 47GW of solar to deliver clean power by 2030: while rooftop is an important part of delivering clean power, both it and domestic solar as a whole are just part of the energy mix needed (NESO, Clean Power 2030 (November 2024)).</p>	<p>N</p>

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<p>Cumulative effects</p>	<p>Braunton Parish Council wishes to express its concern that there appears to be no joined up strategic approach with XLinks and the White Cross offshore wind farms. It is not appropriate to have two onshore cable routes planned within the same area covered by a Joint North Devon and Torridge Local Plan.</p> <p>The Council requests that if these offshore wind farms in the Celtic Sea go ahead can XLinks and White Cross work together to bring the onshore cabling for both projects onshore at Cornborough. It would be unreasonable to impact more communities then necessary due to the lack of a joined approach.</p>	<p>Braunton Parish Council</p>	<p>One of the driving factors in selection of a cable route (whether it is offshore or onshore) is the connection point for which an energy project needs to connect to. This decision process is controlled by the National Energy System Operator (NESO) following a review of suitable connection points for the national grid network and a subsequent grid connection offer.</p> <p>The Applicant understands that White Cross Wind Farm is proposed to connect into East Yelland substation and requires a 33kV/132kV connection to the national grid. The proposed Celtic Sea offshore wind projects would also require a 33kV/132kV connection point.</p> <p>The Proposed Development transmits a 400kV supply which means we require a 400kV substation with associated 400kV overhead lines connected to the national grid. This is why we need to connect to the existing Alverdiscott Substation Site as it has existing 400kV overhead lines. We also understand from the NESO that there is insufficient existing capacity for both XLinks and White Cross to connect into the Alverdiscott Substation Site.</p> <p>The East Yelland is not suitable as a connection point for the Proposed Development as it does not have any existing 400kV electrical infrastructure (substation or overhead lines) and the East Yelland site would require significant upgrades and new 400kV towers and overhead lines to connect to the national grid. The site selection and assessment of alternatives process undertaken by the Applicants has been outlined within Volume 1, Chapter 4: Need and Alternatives of the ES (Document Ref: 6.1.4) and the Project Development and Consideration of Options (Annex 2 of the Planning Statement).</p> <p>The location at which the Proposed Development would connect into the National Grid has been informed by an assessment undertaken by the National Grid Electricity System Operator (NGESO) which identified the Alverdiscott Substation</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
			<p>Site as the most appropriate location for the Proposed Development to connect into the National Grid. The Applicant undertook supplementary assessments (included as appendices to Volume 1, Chapter 4: Need and Alternatives (Document 6.1.4) to the NGENO assessment to confirm the Alverdiscott Substation Site was the most appropriate option. The NGENO and Applicant's assessments all included South Wales connection points in their assessments.</p> <p>Cumulative projects and plans have been listed within Appendix 5.3: Cumulative Effects Assessment Screening Matrix of the ES (Document Ref:6.1.5.3), including the White Cross Offshore Wind Farm (onshore project) and The Crown Estate Round 5 Celtic Sea project development areas.</p> <p>As outlined in Appendix 2: Project Development and Considerations of Options of the Planning Statement (Document Ref: 7.2), a four-stage process was undertaken to identify the optimal Landfall site for the Proposed Development. This is described in Section 3.4.</p> <p>A discussion of the process undertaken to identify the location of the Onshore Cable Route comprises Section 3.6.</p>	

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>National Grid</p>	<p>We are told that the National Grid have said this is the only available site for this proposed scheme and you are including their extension to the site within your applications. Whilst you have held public consultations we have never seen a National Grid representative to explain why this location has been selected. It would be useful if they were to engage with the community to explain more fully why they have come to this decision. They could also address other community concerns over the possibility of more pylons to transfer the power to the grid.</p>	<p>Alverdiscott and Huntshaw Parish Council</p>	<p>Appendix 2 of the Planning Statement: Project Development and Considerations of Options (Document Ref: 7.2) provides detail on site and route selection, including selection of the converter station, grid connection point, cable route and landfall point.</p> <p>The selection of the area at which landfall is made has been heavily informed by an assessment undertaken by the National Grid Electricity System Operator (NGESO) which identified the Alverdiscott Substation Site as the most appropriate location for the Proposed Development to connect into the National Grid. The Applicant undertook supplementary assessments (included as appendices to Volume 1, Chapter 4: Need and Alternatives of the ES (Document 6.1.4) to the NGESO assessment to confirm the Alverdiscott Substation Site was the most appropriate option. The Project understands NGESO does not propose additional pylons to transfer the power and that any works by NGET would be applied for directly to the planning authorities.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Community benefit				
Use of compound site	That the Bideford Town Council Neighbourhood Plan Working Party be asked to look at the compound site to be used for the community post construction.	Bideford Town Council	<p>We are working with Torridge District Council and Devon County Council to develop a community benefit package that responds the local need and will share more information during examination. We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway. The mechanism for implementing community benefits will be address through further discussions with the local authorities and other stakeholders.</p> <p>In this case however, the Applicant is required by contract to return land to current landowners to continue their agricultural operations. We have no legal rights beyond the temporary use of the land for a construction compound. Given this, the Applicant has not prepared any plans for community use of the compound following the construction phase and note that any proposed land use change would require consent of the landowner and a separate planning application.</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Financial payments to community</p>	<p>The Council asks XLinks to consider the wider community and that there should be a benefit through financial payments.</p> <p>This funding will allow communities to spend on further investment in energy and biodiversity projects.</p> <p>The Council is of a view that the compensation payments should be generous and commensurate with the level of disruption caused by the project.</p>	<p>Littleham and Landcross Parish Council</p>	<p>This is noted.</p> <p>We are exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon including through the establishment of a community benefit fund.</p> <p>The Applicant has met with both Devon County Council and Torridge District Council to discuss community benefit and notes Council's preference in relation to the location of investment associated with the Community Benefit Fund.</p> <p>Some benefits will be provided directly through the DCO and the delivery of the Project and some will be outside of the DCO pursuant of the Community Benefits Package.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p> <p>We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway. The mechanism for implementing community benefits will be address through further discussions with the local authorities and other stakeholders.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Community benefit</p>	<p>The A&HPC has the following suggestions for possible measures of mitigation for the community:</p> <ol style="list-style-type: none"> 1. The establishment of a registered consultancy firm / group with knowledge of the locality and the buildings who would build a positive relationship with the residents to advise them of appropriate green options on a building-by-building basis, in order to reduce their carbon footprint, future proof the areas energy supply and reduce energy expenses 2. Grants provided after said consultation to assist in upgrading their properties to greener energy solutions 3. Local contractors associated with the consultancy scheme qualified to carry out the works. 	<p>Alverdiscott and Huntshaw Parish Council</p>	<p>These suggestions are noted.</p> <p>We are exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, which may include the tender of work packages during the construction of the project and through the establishment of a community benefit fund.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p> <p>The Applicant has met with both Devon County Council and Torrington District Council to discuss community benefit and notes Council's preference in relation to the location of investment associated with the Community Benefit Fund.</p> <p>Some benefits will be provided directly through the DCO and the delivery of the Project and some will be outside of the DCO pursuant of the Community Benefits Package. We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway.</p> <p>The mechanism for implementing community benefits will be address through further discussions with the local authorities and other stakeholders.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Local energy deal</p>	<p>In addition, if this were to be coupled with a special energy deal, for the specific area, through one of your partners, for example Octopus, then each resident would have the choice to take advantage of this through the supplier or take another tariff from an alternative supplier.</p>	<p>Alverdiscott and Huntshaw Parish Council</p>	<p>The Proposed Development would supply electricity to the National Grid. Electricity supply to households is managed separately by domestic energy suppliers, via the electricity distribution network. As such, the Applicant is not able to provide a local electricity discount as part of the Proposed Development.</p> <p>We are exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, which may include the tender of work packages during the construction of the project and through the establishment of a community benefit fund.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p> <p>We are working with Torridge District Council and Devon County Council to develop a community benefit package that responds the local need and will share more information during examination. We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway. The mechanism for implementing community benefits will be address through further discussions with the local authorities and other stakeholders.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Community participation	Concerns were raised that there was a lack of clarity in how local communities would participate in the success of the project, for offset the local disruption etc, for example through the formation of Community Interest Companies (CIC). It was agreed that a letter be sent to XLinks to this effect as part of the project consultation. In this respect it was felt you might want to consider setting up a Community Interest Company (CIC).	Alwington Parish Council	<p>We are exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, which may include the tender of work packages during the construction of the project and through the establishment of a community benefit fund.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p> <p>We are working with Torridge District Council and Devon County Council to develop a community benefit package that responds the local need and will share more information during examination. We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway. Mechanisms for implementing community benefits such as CICs or other vehicles will be address through further discussions with the local authorities and other stakeholders.</p>	N
Construction				
Construction noise	Protection of Bid 4 from noise and disturbance from the operation of the compound.	Bideford Town Council	Local Development Plan allocations have been included within the CEA long list and location plan (onshore), in Appendix 5.3: Cumulative Effects Assessment Screening Matrix of the ES (Document Ref:6.1.5.3).	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
			<p>Bid 04 allocated housing site is 34 hectares and is expected to deliver 600 dwellings and a 420-place primary school. Up to 430 homes are expected to be delivered within the plan period i.e. before 2031. However, no application has yet been submitted.</p> <p>The significance of noise effects associated with the construction and use of the constructor compounds and the construction of the Converter Station are studied within Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6). Potential noise impacts from the construction of the converter station and associated compounds are assessed at 6.10.65 to 6.10.80.</p> <p>These effects have been determined based upon methodology outlined in the relevant standards. This methodology includes calculating the operational rating sound level predicted at nearby receptors, including many of the nearest residential properties, due to construction and use of the compound, and the construction of the convertor station.</p> <p>The Outline Onshore Construction Environmental Management Plan (CEMP) (Document Ref. 7.7) includes measures for the control of construction noise such as set working hours, noise attenuation, quieter equipment, and acoustic enclosures for loud plant items. These measures have been accounted for within the assessment of noise impacts.</p> <p>Overall, no significant noise impacts are expected from the construction of the converter station or its associated compounds, following mitigation.</p>	

<p>Construction traffic</p>	<p>Members would like to see a Highways Management Plan in place for construction from the commencement of the operation and improvements to Manteo Way to provide for the additional traffic generated during both construction and post construction phases.</p>	<p>Bideford Town Council</p>	<p>Priority Intersection Capacity and Delay software (PICADY) has assessed the Barnstaple Street/Manteo Way junction. The results of the PICADY assessment are set out in section 5.10 within Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5).</p> <p>The integrated Transport Assessment in the ES chapter considers the potential impacts and effects of the Proposed Development on the operation of the highway network including along Manteo Way, in accordance with relevant parts of the relevant guidance and best practice.</p> <p>Both an Outline Onshore CEMP (Document Ref. 7.7) and Outline Construction Traffic Management Plan (CTMP) (Document Ref. 7.12) have been submitted as part of the DCO application and fulfil many of the functions of a Highways Management Plan for traffic during the construction and post-construction phases.</p> <p>The final CTMP prepared in accordance with the Outline CTMP (Document Ref. 7.12) will set out restrictions on construction HGV movements through the Barnstaple Road/Manteo Way junction to limit these to no more than 10 per hour during the peak hours alongside management measures to reduce the impact of HGV movements.</p> <p>The Outline CTMP sets out that a pre-entry condition survey will be undertaken before the start of works and after the substantial completion of works on minor highway links and new junctions used by HGVs to access the Onshore Infrastructure Area. Any damage to the highway that has been demonstrably caused by construction traffic associated with the Proposed Development will be repaired.</p> <p>The full CTMP will be prepared in consultation with Devon County Council prior to the commencement of material traffic movements.</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
			<p>It will set standards and procedures for aspects of the Proposed Development including managing the numbers and routing of Heavy Goods Vehicles (HGVs) during the construction phase; managing the movement of employee traffic during the construction phase; and details of measures to manage the safe passage of HGV traffic via the local highway network.</p>	

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>CEMP compliance</p>	<p>The Outline Onshore CEMP, should include the following:</p> <ul style="list-style-type: none"> • Details on how corrective action will be decided upon and actioned if non-compliance with the CEMP is identified. • Details on how contracts will be managed to ensure the principal contractor will adhere to the CEMP. • Monitoring and reviewing procedures that will allow the Applicant to maintain oversight of the principal contractor's compliance with the CEMP and other environmental mitigation. 	<p>Environment Agency</p>	<p>The Principal Contractor(s) have not been appointed at this stage. The Outline Onshore Construction Environmental Management Plan (On-CEMP) submitted with the application (document ref. 7.7) will be updated by appointed contractors to include the details on compliance suggested. The final On-CEMP will be submitted to Torridge District Council for approval prior to construction.</p> <p>The Applicant has updated the Outline Onshore CEMP (Document Ref: 7.7) to include the measures requested. Implementation of the On-CEMP is outlined in Section 1.1.</p> <p>All construction staff will be required to follow the final On-CEMP(s) and implement the measures to control the environmental impacts during construction. The requirement to comply with the procedures of the final On-CEMP(s) will be as included in the contract conditions for each element of the works, including the supply chain as appropriate.</p> <p>During the construction process, the implementation of the measures within the final On-CEMP(s) will be monitored to ensure the measures are implemented correctly and that the measures remain effective. The accompanying management plans are necessary documents for the implementation of the final On-CEMP(s) and the measures will be updated in discussion with the local planning authority, where necessary.</p> <p>During construction it will be necessary for the final On-CEMP(s) to be adhered to in addition to the accompanying documents, which are the management plans listed in Table 1.1.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Disruption to local road network</p>	<p>It was a concern that the number of heavy vehicles could cause serious disruption and added pressure on the road network.</p>	<p>Littleham and Landcross Parish Council</p>	<p>Measures have been set out in the Outline CTMP (Document Ref: 7.12) related to all areas of onshore construction activity identified in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5) as potentially leading to adverse traffic and transport effects, including enabling works and main construction activity.</p> <p>The Outline CTMP sets out that a pre-entry condition survey will be undertaken before the start of works and after the substantial completion of works on minor highway links and new junctions used by HGVs to access the Onshore Infrastructure Area. Any damage to the highway that has been demonstrably caused by construction traffic associated with the Proposed Development will be repaired.</p> <p>The Proposed Development will include a number of improvements to the local highway network, which will facilitate access for HGVs and AILs during both construction and operation and maintenance.</p> <p>A comprehensive Transport Assessment is carried out and reported in the ES chapter. The impacts assessed include:</p> <p>Driver delay (including temporary delays to public transport services);</p> <ul style="list-style-type: none"> • Severance; • Non-motorised user delay; • Non-motorised user amenity and fear and intimidation; • Road safety; and • AILs. <p>Overall, it is concluded that there will be no significant effects arising from the Proposed Development during the construction, operation and maintenance or decommissioning phases.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Noise pollution & working hours</p>	<p>Whilst this proposed development is in a rural area we have evidence and many reports that have resulted in complaints to TDC of noise pollution from the current solar panel installation adjacent to the proposed site. Due to the location and elevation of the proposed site noise and other disturbances have already been shown to detrimentally affect residents and with your development expected to last for 6 years the A&HPC consider the operating hours are crucial in an attempt to maintain the goodwill of the local residents.</p> <p>The PC request proposed operating hours be amended to:</p> <ul style="list-style-type: none"> • 8am to 6pm Monday to Friday • 8am to 1pm Saturday • No operations on Sundays and Bank Holidays 	<p>Alverdiscott and Huntshaw Parish Council</p>	<p>Normal construction working hours will be Monday to Friday 07:00-19:00 and Saturday 07:00-13:00. These are standard working hours adopted across the construction industry for projects of a similar scale.</p> <p>The working hours and duration of construction represent the maximum design scenario for noise generation.</p> <p>The Outline CEMP will include measures for the control of construction noise such as set working hours, acoustic attenuation, quieter equipment, and acoustic enclosures for loud plant items. These measures have been accounted for within the assessment of noise impacts.</p> <p>Thorough communication with local residents and stakeholders will continue throughout construction. As outlined in the Outline Onshore Construction Environmental Management Plan (Document Ref: 7.7), a Community Liaison Group would be set up prior to construction and would continue through the construction phase of the Proposed Development as a formal forum for local issues to be raised. A Community Liaison Officer would be appointed to lead discussions with local communities, and also act as the primary point of contact should there be any queries or complaints.</p> <p>In addition, a Community Liaison Officer will be appointed to act as a dedicated point of contact for local stakeholders and would take a proactive approach to communications.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Worker accommodation</p>	<p>You state in your brochure that during construction you will have up to 400 people needing to access the site and that some may need local accommodation.</p> <ol style="list-style-type: none"> 1. Can you specify where this local accommodation may be? 2. We are concerned that the local area may be looking at temporary workers housed in on site caravans / mobile homes / converted containers etc. 3. What assurances can you give the community that this will not be the case? 	<p>Alverdiscott and Huntshaw Parish Council</p>	<p>The Applicant has prepared an Outline Accommodation Strategy (Document Ref. 7.13) as part of the DCO application. This shows local accommodation provision is likely to have capacity to comfortably meet demand outside the peak months. The document assesses the potential for local housing stock across different tenures to accommodate construction workers moving to the area and recommends options to appropriately house workers which have successfully been implemented on other larger projects such as Hinkley Point C. The Outline Accommodation Strategy (Document Ref. 7.13) sets out that the majority of workers are expected to be accommodated in spare rooms or other private rented stock (60%), with only 13% accommodated in caravans.</p> <p>As an example, looking specifically at accommodation in the private rented sector, it is calculated that even at the peak of construction on the Proposed Development, lettings to construction workers would only account for 1.5% of annual private rental sector lettings in the local area.</p> <p>Similarly, the assessment calculates that at the peak of the construction workforce, construction workers would take up only 0.5% of holiday let properties, 0.3% of caravan pitches, and 1.0% of rooms in local hotels & B&Bs.</p> <p>The Applicant does not propose the use of temporary on-site worker accommodation.</p>	<p>N</p>
Consultation				
<p>No comment</p>	<p>No relevant impacts expected and therefore no comment.</p>	<p>NATS en-route safeguarding; Somerset Drainage Boards Consortium; Cornwall Council</p>	<p>This is noted.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
EA engagement	<p>Any requests to disapply any permits or consents should be sent to us in writing as soon as possible to allow us sufficient time to consider them (minimum 6 months).</p> <p>Depending on the outcome this will have implications on the content of the DCO.</p>	Environment Agency	<p>The Applicant will provide Environment Agency sufficient notice and work towards agreeing Protective Provisions where disapplication of any relevant environmental permits is proposed. This is currently restricted to Flood Risk Activity Permits (FRAPs) that may be required for trenchless crossings of the beach and River Torridge. Article 51 of the draft DCO (Document Ref: 3.1)</p> <p>Details of other consents required to construct the Proposed Development are included in the Other Consents and Agreement document (Document Ref. 7.21) and include the possible need for permits for concrete batching and waste exemptions for example.</p>	N
Future consultation	<p>Due to the proximity of some of our existing or future assets, NGET wishes to express their interest in further consultation while the impact on our assets is still being assessed.</p> <p>Where the Promoter intends to acquire land, extinguish rights, or interfere with or work within close proximity to any of NGET's apparatus and land, this will require appropriate protection and further discussion on the impact to its apparatus and rights.</p>	National Grid Electricity Transmission	<p>This is noted.</p> <p>The Applicant has undertaken regular engagement with NGET and will continue during the future stages of the project, particularly to ensure appropriate protections are in place and with regard to the proposed Alverdiscott Substation Site expansion which NGET are seeking separate planning approval for and will construct.</p>	N
Converter station design				
Fire safety	<p>Consideration should be given to the requirements for fire and rescue access into and around the buildings for fire-fighting purposes.</p> <p>Fire-fighting facilities should be selected and designed to assist the fire and rescue service in</p>	Devon and Somerset Fire and Rescue Service	<p>The design of the converter station will comply with all relevant statutory requirements including building regulations, building control requirements and fire safety in consultation with the fire authority.</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
	<p>protecting life, protecting fire fighters, reducing building losses, salvaging property and goods and minimising environmental damage. Early consultation with the Fire Authority and local authority building control is advised when deciding which facilities should be provided. Where appropriate, fire-fighting facilities should include:</p> <ul style="list-style-type: none"> • the provision of vehicular access for fire appliances to the perimeter of the building(s) or site; • provision of easy and quick entry to the site/building(s) for fire fighters and their equipment; • provision of and access to sufficient supplies of fire-fighting medium (usually water); • provision for removing spent fire-fighting extinguishing medium (e.g. drainage). <p>Every building should be provided with suitable access for fighting purposes and where access is restricted, fire appliances access to buildings should be discussed with the fire and rescue service at an early stage.</p>		<p>The design will be developed to optimise access to fire dampers, balancing dampers, actuators, sensors and other active components for both planned and emergency access.</p> <p>Protected areas of the external facade would provide a minimum of 60 minutes fire resisting construction. External walls adjacent to the transformers will provide 240-minute fire resisting construction.</p> <p>Private fire main infrastructure, with all necessary central tank, pumphouse and site fire hydrant requirements would be provided, and fire alarm systems will be designed in accordance with BS 5839.</p> <p>Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3) captures how the Proposed Development is to be made safe and secure during the construction, operation and maintenance and decommissioning phases. For example, it details that the design of the Converter Stations would comply with all relevant statutory requirements including building regulations, building control requirements and fire safety in consultation with the fire authority and that the detailed design of lighting would be consulted on and approved by Torridge District Council (at the detailed design stage) to ensure the safety and security of the Proposed Development.</p> <p>The Design Principles Statement establishes the core design principles for the Proposed Development and seeks to balance good design with the functional requirements of the infrastructure.</p> <p>Outlining the design considerations for the Onshore Converter Station Site. Careful consideration has been given to ensure balance is achieved between the visual appearance, sustainability and functionality of each building and operational equipment including fire safety.</p>	

Topic	Summary of comments	Body	Response	Design change (Y/N)
			<p>At this time, decisions on the exact locations of specific components and the precise technologies, as well as construction methods to be employed, are yet to be confirmed.</p> <p>These details remain pending as the Applicant is following a Project Design Envelope approach (PDE) and will develop the detailed design in conjunction with contractors during and following its procurement events for the development. The PDE approach defines a design envelope and parameters within which the final design would sit. It allows flexibility for elements that would require more detailed design subsequent to submission of the Application for development consent, such as siting of infrastructure and construction methods.</p> <p>The above notwithstanding, the Design Principles Statement document includes a number of overarching Onshore Design Principles as well as more granular design principles and parameters for each Onshore and Offshore Element of the Proposed Development. These principles and parameters, secured via Requirement 4 -Detailed Design Approval of the draft Development Consent Order.</p>	
Ecology				
Biodiversity net gain	The Applicant should make more information available in respect of the means of delivering off site biodiversity net gain.	Bideford Town Council	<p>The Proposed Development is not subject to a mandatory net gain requirement under the Environment Act 2021.</p> <p>Nevertheless, the Applicants have engaged with statutory consultees to discuss the approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit.</p> <p>Approach to biodiversity enhancement is set out in section 1.8 within Volume 2, Chapter 1: Onshore Ecology and Nature</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
			<p>Conservation of the ES (Document Ref: 6.2.1). This includes habitat creation at the Converter Site, including features which increase connectivity with habitat features beyond the site. This also provides mitigation habitat for protected species such as dormice, bats and breeding birds. This approach is also present in habitat creation areas to be formed in blocks to either side of the Torridge Estuary and further hedgerow enhancements along the HVDC cable route.</p> <p>The Applicant is continuing discussions with landowners and the North Devon Biosphere about additional opportunities for contributing to biodiversity enhancement schemes in the local area. We are also in discussions with a landowner to provide a new area of woodland planting on the eastern side of the River Torridge (adjoining existing woodland) and the outcome of these discussions will be concluded during examination.</p>	

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Biodiversity net gain</p>	<p>The Council asks that XLinks ensures that the effects of the project on biodiversity and local communities is fully considered and due compensation considered.</p>	<p>Littleham and Landcross Parish Council</p>	<p>Potential impacts on local communities in the vicinity of the Proposed Development are fully considered in Volumes 2 and 4 of the Environmental Statement (Document refs. 6.2 and 6.4). The approach to biodiversity is set out in section 1.8 within Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), including reinstatement of Devon Hedgerows and enhancement of habitat to increase connectivity across landscape.</p> <p>The Proposed Development is not subject to a mandatory net gain requirement under the Environment Act 2021. Nevertheless, the Applicants have engaged with statutory consultees to discuss the approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit.</p> <p>By careful routing, the scheme avoids direct impacts on any statutory designated sites and minimises effects on locally-designated sites. In many cases, trenchless techniques such as Horizontal Directional Drilling (HDD) mean that it will be possible to cross important biological or geological sites with no direct impacts. The Proposed Development avoids direct impacts on ancient woodland and other important habitats by a combination of route avoidance and measures such as HDD which prevents direct impacts upon existing habitats. Where feasible the Proposed Development has used the Conservation Hierarchy (“Avoid, minimise, restore and offset”) as a principle for its routing, design and construction methods.</p> <p>The Applicant is also continuing discussions with landowners and the North Devon Biosphere about additional opportunities for contributing to biodiversity enhancement schemes in the local area.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Biodiversity net gain</p>	<p>A stated aim of XLinks should be to "create an enhanced wildlife corridor around Bideford to make the most of the opportunity". This should involve detailed consultation and agreement with landowners along the route.</p> <p>The Council considers that the XLinks strategy should be to convince the local community that the disruption and considerable inconvenience of the project will be worthwhile because of the ultimate benefits to local residents.</p> <p>It is critical that any biodiversity net-gain is along the corridor, rather than in other areas.</p>	<p>Littleham and Landcross Parish Council</p>	<p>The Applicant is required by contract to return land used for the construction of the Onshore HVDC cable corridor to current landowners to continue their agricultural operations. Where reasonably practicable, we are including enhancement of existing hedgerows to provide improvement to the existing biodiversity along the corridor. We are also in discussions with a landowner to provide a new area of woodland planting on the eastern side of the River Torridge (adjoining existing woodland) and the outcome of these discussions will be concluded during examination. Further information is set out in the Outline LEMP (Document Ref: 7.10). The overall benefit from the Proposed Development include a significant beneficial effect on climate change as set out in Volume 4, Chapter 1: Climate Change of the ES (Document Ref: 6.4.1) and a significant contribution to the UK's need for clean power as set out in Volume 1, Chapter 4 of the Environmental Statement (Document Ref: 6.1.4)</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Fish</p>	<p>The impacts to fish species have not been assessed.</p> <p>Potential impacts on fish species include noise, silt disturbance and physical disturbance within channel, especially during spawning, juvenile development or migration activity. Drilling can also impact fish due to noise and vibrations.</p> <p>Electromagnetic fields from the cables can impact on the behaviour and migration of fish.</p>	<p>Environment Agency</p>	<p>Since the publication of the PEIR, further assessment of the impacts on fish populations within the River Torridge catchment has been undertaken and reported in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>Baseline fish populations are set out in Section 1.7. Mitigation measures related to the Proposed Development are set out in Section 1.8, with impacts considered in Sections 1.10, 1.11 and 1.12.</p> <p>Following mitigation measures, no significant effects are expected from noise and vibration, silt disturbance, physical disturbance, or electromagnetic fields on fish.</p> <p>The Applicant met with representatives of the Environment Agency on 12 August 2024 to discuss their concerns about impacts on fish and agreed a way forward in terms of additional information to be provided in the ES chapter.</p> <p>A detailed quantitative assessment of possible impacts from vibration and reverberated noise generated into the water column by HDD operations was scoped out of the assessment.</p> <p>Requirement 17 of the draft DCO (Document Ref: 3.1) compels the Applicant to adhere to guidance on electro-magnetic fields.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Fish</p>	<p>No fish surveys have been conducted in any of the main or minor watercourses. There is the potential for protected fish species to be present in the minor watercourses and tributaries of the River Torridge. Risk of unmitigated damage to this protected species. Fish survey data on necessary watercourses is required to establish a baseline, and to inform impact assessment and mitigation measures (such as timing restrictions).</p>	<p>Environment Agency</p>	<p>Since the publication of the PEIR, further assessment of the impacts on fish populations within the River Torridge catchment has been undertaken and reported in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>Fish data from Environment Agency online resources have been used to identify fish species present in the Torridge catchment and Taw/Torridge Estuary. This is set out in Section 1.7 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>The Applicant met with representatives of the Environment Agency on 12 August 2024 to discuss their concerns about impacts on fish and agreed a way forward in terms of additional information to be provided in Volume 2 Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1). We confirmed with the Environment Agency that no fish surveys were required.</p> <p>Following mitigation measures, no significant effects are expected from noise silt disturbance, physical disturbance, noise, vibration or electromagnetic fields on fish in main or minor watercourses.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Fish	<p>The Torridge/Taw estuary, River Torridge and associated tributaries have significant salmon and sea trout runs, with associated timing restrictions of in channel works. European eel, sea lamprey, river lamprey and brook lamprey are all present in the estuary and up into freshwater channels, and there will be seasonal restrictions on works associated with these species. There are shad species using the Taw/Torridge estuary and in the lower parts of the river on the Taw. The River Torridge is designated as a migratory route for river lamprey, Atlantic salmon, European eel, sea lamprey, unidentified shad species, allis shad and twaite shad.</p> <p>Bullheads were recorded during the invertebrate survey (1.3.12 of Volume 2, Appendix 1.10), which are an Annex II species under the Habitats Directive.</p>	Environment Agency	<p>This is noted and addressed in the ES. Since the publication of the PEIR, further assessment of the impacts on fish populations within the River Torridge catchment has been undertaken and reported in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>Fish data from Environment Agency online resources have been used to identify fish species present in the Torridge catchment and Taw/Torridge Estuary. This is set out in Section 1.7 of the ES chapter.</p> <p>The Applicant met with representatives of the Environment Agency on 12 August 2024 to discuss their concerns about impacts on fish and agreed a way forward in terms of additional information to be provided in Volume 2 Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1). We confirmed with the Environment Agency that no fish surveys were required.</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Aquatic macroinvertebrates</p>	<p>Issue Lack of clarification (Vol 1, Chapter 2) on whether aquatic macroinvertebrate monitoring upstream and downstream of a watercourse crossing point is to be used.</p> <p>Impact Silts and other potential pollution from surface crossings may be undetected.</p> <p>Solution Continue to monitor the macroinvertebrate population approx. 50m upstream and downstream of a watercourse crossing point where invasive techniques are used.</p>	<p>Environment Agency</p>	<p>As set out in Section 1.7 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), further aquatic invertebrate surveys were undertaken following the PEIR and the data presented in the chapter. Monitoring measures are set out in Section 1.16. These are considered to address the comment regarding lack of clarity.</p> <p>As aquatic invertebrate monitoring provides a good indicator of water quality and health, monitoring of aquatic invertebrates at locations up and downstream of the Proposed Development will be undertaken annually for five years after completion of construction.</p>	<p>N</p>
<p>Aquatic macroinvertebrates</p>	<p>Limited macroinvertebrate surveys and low species diversity results due to dry weather and low water levels. Potentially inaccurate calculated results, and the risk that protected or notable species may have been missed. Repeat aquatic macroinvertebrate survey outside of the summer period (i.e. spring or autumn) to provide a suitable baseline prior to construction.</p>	<p>Environment Agency</p>	<p>As set out in Section 1.7 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), further aquatic invertebrate surveys were undertaken following publication of the PEIR and the data presented in the ES chapter. Monitoring measures are set out in Section 1.16.</p> <p>As aquatic invertebrate monitoring provides a good indicator of water quality and health, monitoring of aquatic invertebrates at locations up and downstream of the Proposed Development will be undertaken annually for five years after completion of construction.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Habitats Regulation Assessment	<p>Issue</p> <p>The impact assessment does not yet reflect the findings of the HRA.</p> <p>Impact</p> <p>Potential impacts to European sites / species may be overlooked.</p> <p>Solution</p> <p>The impact assessment of protected areas should be updated in the final WFD Assessment to reflect the findings of the HRA.</p>	Environment Agency	<p>A Habitats Regulation Assessment (HRA) Screening was issued to JNCC, Natural England and Natural Resources Wales on 22 May 2024 for comment. It is noted that, in agreement with JNCC and Natural England, only offshore elements of the Proposed Development have been scoped into the HRA assessment.</p> <p>A HRA Report to Inform Appropriate Assessment (RIAA) has been prepared to accompany the DCO application. The Applicant presented the key findings of the HRA RIAA to JNCC and Natural England on 30 October 2024.</p> <p>A final Water Framework Directive (WFD) Assessment for onshore is provided in Volume 2, Appendix 3.2 (Document Ref. 6.2.3.2) of the ES.</p>	N
Habitat restoration	<p>The proposal to reinstate agricultural habitats of low biodiversity value, e.g. improved grassland and arable leys, on a like-for-like basis following construction, lacks ambition to improve and enhance agricultural habitats for biodiversity.</p> <p>Prepare habitat creation plans to restore agricultural habitats with more biodiverse habitats such as species-rich grasslands.</p>	Environment Agency	<p>The Applicant is required to return land to current landowners to continue their agricultural operations. Given this, the Applicant has not prepared habitat creation plans for the restoration of agricultural land. However, Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1) at Figure 1.4 shows where boundary vegetation could be improved over and above the reinstatement of the works.</p> <p>Reinstatement and enhancement of hedgerows is addressed in Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p>	N

<p>Watercourses</p>	<p>Issue: Lack of clarity regarding the proposed buffer distances e.g. for construction compounds away from areas of habitat of high potential value to otters.</p> <p>Impact: Potential to disturb nocturnal protected species such as otters and bats.</p> <p>Solution: Implement and maintain a 10m buffer strip (measured from the top of the riverbank), which excludes construction compounds, fencing and lighting.</p> <p>Erect exclusion fencing at terrestrial-edge of buffer strip.</p> <p>Sow bare buffer-strips with a species-rich grass and wildflower mix, to reduce nutrient load and improve biodiversity value.</p>	<p>Environment Agency</p>	<p>Buffers of 15m have been adopted for woodlands and wooded watercourses. Buffers of 8m have been adopted for all other watercourses save for ephemeral field ditches that need to be crossed by the haul roads.</p> <p>Buffer distances and treatments are provided within Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1). Buffer zones are also set out in the Commitments Register for woodlands, main rivers and watercourses (Document Ref. 6.1.3.1).</p> <p>Where practicable, the Onshore HVDC Cable Corridor has avoided a habitat of significant value to otters. However, the route would pass through some areas of suitable habitat and cross a small number of ordinary watercourses. Where the cable route crosses the River Torridge and the larger watercourses at Kenwith Stream and Jennett's Tributary at West Ashridge, trenchless techniques such as HDD would be implemented to reduce the potential impact as far as possible by passing under the river and associated terrestrial habitats.</p> <p>The outline Landscape and Ecology Management Plan (Outline LEMP) (Document Ref: 7.10) includes details of how preconstruction surveys will assess the risk to mobile populations and continue to monitor that situation throughout.</p> <p>The outline Onshore Construction Environmental Management Plan (Outline On-CEMP) (Document Ref: 7.7) contains details of how construction work sites, including HDD, compounds, fencing and lighting would be located a suitable distance away from areas of habitat of high potential value to otters to minimise disturbance levels. In general, a minimum buffer of at least 8m would be in place alongside the banks of ordinary watercourses within construction areas in line with the EA advice on river courses. These commitments are included in the Commitments Register (Document Ref. 6.1.3.1).</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
Watercourses	Inadequate buffer strips along watercourses can also increase vulnerability of watercourses to pollution from mobilised sediments and prevent vegetation establishment which would otherwise stabilise and protect the bank.	Environment Agency	<p>Buffer distances and treatments are provided within Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1). Details of mitigation to maintain connectivity across HVDC cable route will be set out in the On-CEMP.</p> <p>A minimum 8m buffer would be maintained from the banks of ordinary watercourses and a 16m buffer from tidal main rivers and the landward toe of associated formal and informal flood defences. These measures are detailed in the Commitments Register (Document Ref. 6.1.3.1).</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Watercourses</p>	<p>Issue - We support report's recommendation that watercourses should be returned to their baseline condition if impacted by works, but there is no recorded commitment to deliver this.</p> <p>Impact - Watercourse crossings could result in modification to their morphology, e.g. altering the structure or gradient of the banks or increasing watercourse encroachment.</p> <p>Solution - Provide commitment to restore watercourses to baseline conditions, (or provide suitable mitigation elsewhere along the watercourse should the works result in permanent changes).</p>	<p>Environment Agency</p>	<p>Methods for crossing watercourses are detailed in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p> <p>Further details are set out in Volume 2, Chapter 3: Hydrology and Flood Risk (Document Ref: 6.2.3) and in Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions (Document Ref: 6.2.4).</p> <p>Where the cable route crosses the River Torridge and the larger watercourses at Kenwith Stream and Jennett's Tributary at West Ashridge, trenchless techniques such as HDD would be implemented to reduce the potential impact as far as possible by passing under the river and associated terrestrial habitats. This is secured in the Commitments Register (Document Ref. 6.1.3.1) and the Works Plans (Document Ref. 2.3).</p> <p>The Onshore HVDC Cable Corridor does cross other drainage ditches for which works would be governed by the management measures identified in the Onshore CEMP (as developed in accordance with the Outline Onshore CEMP (Document Ref. 7.7) and land drainage permits which will also set out mitigation and restoration requirements for any crossings. These drainage ditches have been identified as generally dry.</p> <p>Following completion of the onshore HVDC and HVAC cable installation and Converter Site, the working area would be reinstated to its pre-construction condition, as far as reasonably practicable and as agreed with the relevant planning authority. This would include reconstruction of any drains or ditches crossed using an open cut method.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Connectivity	<p>Heras fencing covered in camouflage netting, used to create Temporary Flight Lines (TFL) to fill hedgerow gaps, can be blown over, creating gaps.</p> <p>Gaps in hedgerows reduce connectivity and fragment the landscape. This can impact species that are reliant on hedgerows e.g. Bats. Solution: Use a more robust/complex TFL. The UK Bat Mitigation Guidelines (2023) suggest alternative layouts, such as the re-placing of a single-line of Heras fencing with triangular bracing, to ensure resistance to high-wind speeds. Other alternatives include willow fencing or trees in IBC containers. TFLs should be at least 2m high and without gaps.</p>	Environment Agency	<p>The Environment Agency's concerns with regard to the stability of Heras fencing used to create temporary flight lines are noted and will be taken into account in the development of the Onshore CEMP which will set out the construction phase requirements for managing ecology impacts.</p> <p>The Onshore CEMP will be developed in accordance with the Outline Onshore CEMP (Document Ref. 7.7) and in consultation with the Environment Agency – refer to Requirement 7 of Schedule 2 of the draft DCO (Document Ref. 3.1).</p>	N
Availability of reports	<p>Otter report has been redacted.</p> <p>We are therefore unable to comment on results, survey details and status of water voles or otters, due to redacted report. Provide the EA with a full non-redacted report, to allow comments to be made.</p>	Environment Agency	A copy of the redacted Otter Report will be provided to the Environment Agency separately.	N
Internationally Designated Terrestrial Sites	Based on the information provided, Natural England concurs with the conclusion that the proposed cable route is unlikely to have a significant effect on terrestrial SACs/SPAs/Ramsar and can therefore be screened out from requiring further Habitat Regulation Assessments.	Natural England	This is noted. As set out in Section 1.3 of this Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), impacts on European sites have been scoped out of this assessment.	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Opportunity	Despite the location of the trenches not coinciding with any SSSIs, this would present a unique opportunity for geologists to record and sample sections of superficial deposits and the underlying Bideford, Bude and Crackington Formations, and could offer a rare glimpse into the history of this bedrock which was deposited about 330 to 310 million years ago.	Natural England	This is noted. The Applicant is maintaining ongoing discussions with local planning authorities and statutory environmental bodies and can explore opportunities for interested geological interest groups to have potentially access the site (subject to site safety requirements) and/or access data resulting from any ongoing survey work.	N
Mermaid's Pool to Rowden Gut SSSI	It is noted that the cable route will make landfall within the Mermaid's Pool to Rowden Gut SSSI which is notified for its geological interest and all efforts should be made to avoid impacts to this feature.	Natural England	The Applicant confirms that Horizontal Directional Drilling (HDD) will be used at this area to avoid potential impacts on items of geological interest at the landfall site. The use of HDD in this area is confirmed in the Works Plans (Document Ref. 2.3) and Schedule 1 of the draft DCO (Document Ref. 3.1).	N
Mermaid's Pool to Rowden Gut SSSI - HDD	The commitment to undertake HDD to avoid sensitive habitats is welcomed by Natural England. Natural England's view at this stage is that the proposal to install high voltage cables using HDD is unlikely to have any significant impact on the geological interest of Mermaid's Pool to Rowden Gut SSSI.	Natural England	The Applicant confirms that HDD will be used at this area to avoid potential impacts on items of geological interest at the landfall site. The use of HDD in this area is confirmed in the Works Plans (Document Ref. 2.3) and Schedule 1 of the draft DCO (Document Ref. 3.1).	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Mermaid's Pool to Rowden Gut SSSI - HDD</p>	<p>Geotechnical survey data will be required at the time of Application to demonstrate the technical feasibility of HDD at the SSSI, and a method statement should form part of the Environmental Statement.</p> <p>Any drilling of exploratory cores into the rock on the foreshore as part of geotechnical investigations to inform HDD feasibility, will need further consultation with Natural England to ensure damage to the SSSI interest is avoided. Faults and fractures in the geology should be expected.</p>	<p>Natural England</p>	<p>The Applicant confirms that an independent HDD feasibility assessment has been undertaken at the landfall site to confirm the suitability of proposed method.</p> <p>The Applicant notes the request for continued engagement with Natural England in relation to any ground investigations proposed prior to and/or during the construction phase of the project and will implement this consultation prior to any proposed works commencing.</p>	<p>N</p>
<p>Mermaid's Pool to Rowden Gut SSSI - HDD</p>	<p>A geological watching brief should be employed during landfall operation to ensure that damage to Mermaid's Pool to Rowden Cut SSSI is avoided.</p>	<p>Natural England</p>	<p>The Applicant confirms that HDD will be used at this area to avoid potential impacts on items of geological interest at the landfall site. The use of HDD in this area is confirmed in the Works Plans (Document Ref. 2.3) and Schedule 1 of the draft DCO (Document Ref. 3.1).</p> <p>The proposed HDD would avoid any potential impacts on the Mermaid's Pool to Rowden Gut SSSI and HDD works would be monitored as part of standard operating practices, including 'watching' for a potential frac-out. An Outline Bentonite Breakout Plan has been included as part of the DCO application (Document Ref: 7.20).</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Mermaid's Pool to Rowden Gut SSSI - HDD</p>	<p>It is noted that landfall Horizontal Directional Drilling (HDD) has an indicative length of 2,110m and it remains unclear if this is technically feasible. Natural England would not want to see the construction of a concrete joint bay (as detailed in Points 3.7.113–3.7.119 (Volume 1 Chapter 3) within the SSSI as this would inevitably damage the geological interest.</p>	<p>Natural England</p>	<p>The Applicant confirms that an independent HDD feasibility assessment has been undertaken at the landfall site to confirm the suitability of proposed method.</p> <p>The Applicant confirms that a concrete joint bay is not proposed within the length of cable corridor between the landfall and offshore exit pit. The indicative length of the HDD is detailed in Volume 1, Chapter 3: Project Description (Document Ref. 6.1.3) of the ES.</p>	<p>N</p>
<p>Mermaid's Pool to Rowden Gut SSSI – Coastal Erosion</p>	<p>With respect to information set out in the PEIR on the HDD launch pit, (Volume 2, Chapter 4, Paragraph 8.5) Natural England advises that the Applicant should demonstrate through appropriate modelling that the launch pit is located sufficiently away from the coast to ensure that coastal erosion and sea level rise will not be an issue.</p>	<p>Natural England</p>	<p>The Applicant confirms that an independent HDD feasibility assessment has been undertaken at the landfall site to confirm the suitability of proposed method, including appropriate set out distances for the landfall 'launch pit' within the proposed landfall site.</p> <p>The Applicant notes that the proposed western boundary landfall site is located at least 80m from the existing pebble beach on the coastline at landfall. Potential impacts associated with climate change are assessed in Volume 4, Chapter 1: Climate Change (Document Ref. 6.4.1).</p> <p>Mermaid's Pool to Rowden Gut Site of Special Scientific Interest (SSSI) falls within the study area of Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions of the ES (Document Ref: 6.2.4).</p> <p>The potential for impact of or damage to Mermaid's Pool to Rowden Gut SSSI is provided in section 4.10 of the ES chapter.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Mermaid's Pool to Rowden Gut SSSI – Coastal Erosion</p>	<p>Evidence should be presented to demonstrate that cable burial depth across the beach will be sufficient to ensure that cables will not be exposed through beach lowering over the lifetime of the project. If coastal erosion predictions demonstrate that cable protection measures may be required over the lifetime of the project, we advise that mitigations measures would be required. It is important to note that whilst the rate of coastal erosion and cliff recession is currently low at the landfall location, any proposal in the longer term to introduce coastal protection for the landfall site that either damages or obscures the geology of the SSSI is unlikely to be acceptable as it may result in disruption to coastal processes resulting in further damage to the SSSI.</p>	<p>Natural England</p>	<p>The Applicant confirms that an independent HDD feasibility assessment has been undertaken at the landfall site to confirm the suitability of proposed method. The Applicant notes the request for continued engagement with Natural England in relation to any ground investigations proposed prior to and/or during the construction phase of the project and will implement this consultation prior to any proposed works commencing.</p> <p>Mermaid's Pool to Rowden Gut Site of Special Scientific Interest (SSSI) falls within the study area of Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions of the ES (Document Ref: 6.2.4).</p> <p>The potential for impact of or damage to Mermaid's Pool to Rowden Gut SSSI is provided in section 4.10.</p> <p>Potential impacts associated with climate change are assessed in Volume 4, Chapter 1: Climate Change (Document Ref. 6.4.1).</p>	<p>N</p>
<p>Mermaid's Pool to Rowden Gut SSSI – Frac-out</p>	<p>Natural England advises that a bentonite management plan is required, to not only demonstrate how drilling mud will be contained and disposed of, but also remedial actions should a frac-out occur during HDD. The management plan should not only consider bentonite reaching the sediment surface, but also potential contamination of groundwater.</p>	<p>Natural England</p>	<p>An Outline Bentonite Management Plan (Document Ref: 7.20) has been submitted with the DCO application, which outlines the procedures for managing and responding to the realisation of bentonite, due to incidents such as frac-out.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Mermaid’s Pool to Rowden Gut SSSI – Drill arisings</p>	<p>Further clarity is required on disposal or otherwise of the rock arising from the HDD reaming process. There is currently no mention of what will happen to the sediment cores recovered in the landfall HDD methodology outlined in Points 3.7.152– 3.7.156 (of Volume 1 Chapter 3) and further consideration is required.</p>	<p>Natural England</p>	<p>Requirements for the management of construction waste are outlined in the Outline Site Resource and Waste Management Plan (SRWMP) developed as an appendix to the Outline Onshore CEMP (Document Ref. 7.7). A SRWMP would be developed by the relevant construction contractor(s) in accordance with the Outline SRWMP.</p> <p>Waste from the construction of the Proposed Development would be managed in accordance with the principles of the waste hierarchy (i.e., avoid, reduce, reuse, recycle, recover and disposal) and the Outline Site Resource and Waste Management Plan (SRWMP), which is a part of the Outline On-CEMP (Document Ref: 7.7.2).</p> <p>The SRWMP would be prepared in line with the CL:AIRE (Contaminated Land: Applications in Real Environments) Definition of Waste: Development Industry Code of Practice (CL:AIRE, 2011). All waste will be transported and managed by appropriately licenced contractors and subject to the duty of care requirements.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Taw Torridge Estuary SSSI</p>	<p>The composition of Taw Torridge Estuary SSSI bird assemblage alters through time as species populations fluctuate. Therefore, any native wetland bird species (in practice waders and wildfowl) present from September to March inclusive will be a legitimate part of the bird assemblage.</p> <p>Natural England advises that birds associated with the SSSI have been recorded foraging along the coast around the landfall site and in the fields behind – notably curlew (tagged on the Skern). The SSSI high tide roost study (2018) recorded a significant Lapwing high tide roost (Iron Bridge) just upstream of the cable route crossing which corresponds with the numbers of lapwing recorded in the applicants 2021/22 surveys. Anecdotal evidence from WEBS volunteers in 2016 as a precursor to this study indicated that the surrounding fields supported lapwing, curlew and snipe at Hallsannery; and gulls, curlew, green sandpiper and redshank at Tennacott Lodge.</p>	<p>Natural England</p>	<p>This is noted and the species notified are considered in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>The survey report identified the wintering and migratory bird populations identified at landfall and estuary sites as of no more than local value. Considering the presence of the nearby Taw Torridge Estuary SSSI, wintering and migratory birds are assessed as an Important Ecological Feature (IEF) at the district level.</p> <p>Considering the mitigation measures adopted as part of the project, the significance of effects of potential contamination on more distant sites such as the Taw Torridge Estuary SSSI would be low adverse.</p> <p>Where IEFs such as populations of wintering and migratory birds associated with the Taw Torridge Estuary SSSI are concerned, there is rather limited value in the habitats on which the developments are sited for particular use by birds, as most are adjacent to existing built-up areas. Including the Proposed Development will not add significantly to this effect.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Taw Torridge Estuary SSSI</p>	<p>Overwintering bird surveys were carried out in 2021/22 to cover the autumn passage and the winter period across the coastal landfall site and estuarine area. Significant numbers of birds were not recorded during that over wintering period, although good numbers of curlew and lapwing were recorded (Table 1.4 and 1.5 of Volume 2 Appendix 1.8) which are two of the key three species for the SSSI.</p> <p>Natural England's Best Practice Guidance for Offshore windfarm including cabling is that 2 years of overwinter bird data should be collected to consider inter annual variability.</p> <p>Given the age of the data collected to support the Application we advise that a further passage and over winter period should be collect in 2024/25 to support the Application.</p> <p>The passage/wintering bird season should be taken as September to March inclusive rather than November to February as set out in Table 1.14 of Appendix 1.8.</p>	<p>Natural England</p>	<p>Additional supplementary bird surveys have been scheduled in the remainder of the 2024 season and where needed the 2025 season to respond to Natural England's concerns. This has been confirmed with Natural England during pre-application meetings.</p> <p>Further detail is provided in Section 1.7 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Taw Torridge Estuary SSSI – Nocturnal surveys</p>	<p>In addition to the second year of surveys, when considering breeding, passage and wintering bird surveys, Natural England notes that the survey effort does not include nocturnal surveys therefore, owls or nocturnal flocks of golden plover/lapwing may have been missed. This is primarily a concern regarding the Alverdiscott Substation site/Connection Development and associated construction compound since works are likely to be present for 6 years and some degree of light disturbance may persist over the lifetime of the project.</p> <p>It may be possible to assume that such birds are present and look to improve habitat elsewhere in the vicinity to support any displaced birds e.g. rough grassland corridors provided for Barn Owl or muck spread on nearby arable fields to encourage invertebrates for plovers.</p>	<p>Natural England</p>	<p>Additional supplementary bird surveys have been scheduled in the remainder of the 2024 season and where needed the 2025 season to respond to Natural England’s concerns. Further detail is provided in Section 1.7 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>It is proposed to include nocturnal surveys in this set of surveys. This has been confirmed with Natural England during pre-application meetings.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Overwintering birds	Section 1.10 of Appendix 1.8 notes the results of the overwintering bird surveys at the landfall. It is not clear whether the survey covered the fields behind the cliff tops. Curlew (tagged on the Skern) have been recorded using fields in this area and therefore if not already surveyed we advise that further consideration is given to these fields	Natural England	<p>The wintering and migratory birds survey identified 12 species of conservation importance overflying and feeding at the coastal site (adjacent to the landfall location). This included a significant number of oystercatchers, curlews, black-headed gull, turnstone and herring gull feeding on exposed seaweed during low tide.</p> <p>Additional supplementary bird surveys have been scheduled in the remainder of the 2024 season and where needed the 2025 season to respond to Natural England's concerns.</p> <p>The results of these supplementary surveys will be provided to Natural England following the DCO application and this approach has been discussed with Natural England during pre-application meetings on 20 June 2024 and 12 August 2024, who have noted no in-principle objection to this approach.</p> <p>Further detail is provided in Section 1.7 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Taw Torridge Estuary SSSI – mitigation measures</p>	<p>Noise and lighting can lead to both the displacement and disturbance of wildlife. Potential impacts will need to be fully considered in the Application and mitigation measures will be required to avoid noise and lighting impacts on overwintering birds using the saltmarsh/mudflat habitats, the coast and surrounding fields for feeding and resting.</p> <p>We advise a working window of 1st April to 31st August of any given year within the boundary of the SSSI and supporting habitat.</p> <p>If the passage and overwintering period can't be avoided then noise and lighting mitigation measures should be secured through a Construction Environment Management Plan (CEMP) to avoid disturbance to ecological receptors within the site and beyond the site boundary during construction and will need to be considered in greater detail than currently presented, as part of the Application.</p>	<p>Natural England</p>	<p>The Commitments Register (Document Ref. 6.1.3.1) includes requirements for the Outline Onshore CEMP (Document Ref. 7.7) to include measures to reduce light and noise disturbance on ecology.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Taw Torridge Estuary SSSI – mitigation measures	If the passage and overwintering period can't be avoided during construction, then Natural England advises as a precautionary measure that all mitigation measure for birds should also be consider for the converter station/sites as these fields may be of value to passage and overwintering species such as golden plover and lapwing from the SSSI.	Natural England	<p>The assessment provided in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation (Document Ref. 6.2.1) includes an assessment of potential impacts on overwintering birds at the Converter Site.</p> <p>Additional supplementary bird surveys have been scheduled in the remainder of the 2024 season and where needed the 2025 season to respond to Natural England's concerns. The results of these supplementary surveys will be provided to Natural England following the DCO application and this approach has been discussed with Natural England during pre-application meetings on 20 June 2024 and 12 August 2024, who have noted no in-principle objection to this approach.</p>	N
Taw Torridge Estuary SSSI – mitigation measures	Natural England advises that measures will be required to protect the natural environment during construction. This includes best practice mitigation in line with the Environment Agency's Pollution Prevention and Control Guidelines to avoid pollution incidents and adverse impacts on the SSSI. We note the detail set out in section 1.8.34 (Appendix 3.2).	Natural England	An Outline Pollution Prevention Plan is included within the Outline Onshore CEMP (Document Ref. 7.7) which addresses appropriate mitigation in line with the Environment Agency's guidelines.	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Taw Torridge Estuary SSSI – BNG</p>	<p>Natural England advises that consideration could be given to enhancements for overwintering birds which could feed into the delivery of Biodiversity Net Gain. This could include features suitable for wintering waders and wildfowl, such as scrapes or lagoons with island refuges.</p>	<p>Natural England</p>	<p>The Proposed Development is not subject to a mandatory net gain requirement under the Environment Act 2021. Nevertheless, the Applicant has engaged with statutory consultees to discuss the approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit.</p> <p>Approach to biodiversity enhancement is set out in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), section 1.8. This includes habitat creation at the Converter Site, including features which increase connectivity with habitat features beyond the site. This also provides mitigation habitat for protected species such as dormice, bats and breeding birds. This approach is also present in habitat creation areas to be formed in blocks to either side of the Torridge Estuary and further hedgerow enhancements along the HVDC cable route.</p> <p>The Applicant is also continuing discussions with landowners and the North Devon Biosphere about additional opportunities for contributing to biodiversity enhancement schemes in the local area.</p>	

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Taw Torridge Estuary SSSI – Fish</p>	<p>Fish are not a notified feature of the SSSI, but the River Torridge is important for several migratory and resident species protected by legislation. Information produced to support the Appledore clean maritime innovation centre planning application (1/1179/2023/LA. AQASS Ltd data and literature review Jan 2024) highlighted the presence of Allis Shad, Twaite Shad, Bass, European eel, Salmon and Trout. Noise, pollution and sediment disturbance are potential impacts.</p>	<p>Natural England</p>	<p>Impacts on fish populations within the River Torridge catchment have been considered in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1). Baseline fish populations are set out in Section 1.7. Mitigation in Section 1.8 and impacts in Sections 1.10, 1.11 and 1.12.</p> <p>Following mitigation measures, no significant effects are expected from noise and vibration, silt disturbance, physical disturbance, or electromagnetic fields on fish.</p> <p>The Applicant met with relevant members of the Environment Agency on 12 August 2024 to discuss their concerns about impacts on fish in a meeting and agreed a way forward in terms of additional information to be provided in Volume 2 Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p>	<p>N</p>
<p>Kynoch's Foreshore Local Nature Reserve (LNR)</p>	<p>Natural England notes that the PEIR (Volume 2, Chapter 1) considers potential disturbance impacts to wetland birds within Kynoch's Foreshore LNR. However, Table 1.6 should be updated to include duration of impact and all sections including 1.4.13 should include all data sources, including Birdtrack, if it hasn't already done so.</p> <p>Natural England advises that further consideration should then be given to adoption of mitigation measures to reduce impacts to the features of this site.</p>	<p>Natural England</p>	<p>Birdtrack data is included in the Appendix 1.2 of Volume 2 of the Environmental Statement (Document Ref: 6.2.1.2).</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Protected species	The Applicant is referred to Natural England's protected species standing advice, which helps developers understand the impact of particular developments on protected species.	Natural England	The Applicant met with Natural England dormice and bat protection specialists on 21 October 2024 to discuss licencing requirements for the Proposed Development. The Applicant noted that draft protected species licences would be submitted to Natural England for agreement post application following the completion of supplementary surveys (following delayed land access). Natural England noted no in-principle objection to the timeframes for provision of draft licences and associated Letters of No Impediment, noting that these matters would need to be reviewed and agreed during the pre-examination and examination timeframes.	N
Protected species	Natural England welcomes the approach taken to avoid or reduce impacts to protected species.	Natural England	This is noted.	N
Protected species	For all licensing matters, applicants should consult Natural England's licensing guidance for the relevant species and decide whether a mitigation licence is required. Natural England is unable to comment on the need for a licence, this responsibility falls to the developer.	Natural England	The Applicant met with Natural England dormice and bat protection specialists on 21 October 2024 to discuss licencing requirements for the Proposed Development. The Applicant noted that draft protected species licences would be submitted to Natural England for agreement post application following the completion of supplementary surveys (following delayed land access). Natural England noted no in-principle objection to the timeframes for provision of draft licences and associated Letters of No Impediment, noting that these matters would need to be reviewed and agreed during the pre-examination and examination timeframes.	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Protected species</p>	<p>Survey effort should be designed to provide sufficient information such that the baseline data in the ES is adequate for the purposes of assessing the impact of the proposal.</p> <p>It is acknowledged that further survey is ongoing or planned for a number of species, either as a result of the mobility of the species, changes in the detailed development design potentially impacting upon the species or for areas where access has not yet been secured.</p> <p>Where any further pre-consent surveys reveal the need for a licence from Natural England, we recommend using our Pre-Submission Screening Service, whereby we can assess a draft licence application and provide a LoNI (Letter of No Impediment), where we consider there to be no reason that a licence would not be granted post DCO consent.</p>	<p>Natural England</p>	<p>The Applicant has engaged with Natural England representatives during the pre-application process, particularly in relation to survey progress and the need for supplementary surveys following the resolution of remaining land access challenges.</p> <p>The Applicant met with Natural England dormice and bat protection specialists on 21 October 2024 to discuss licencing requirements for the Proposed Development. The Applicant noted that draft protected species licences would be submitted to Natural England for agreement post application following the completion of supplementary surveys (following delayed land access).</p> <p>Natural England noted no in-principle objection to the timeframes for provision of draft licences and associated Letters of No Impediment, noting that these matters would need to be reviewed and agreed during the pre-examination and examination timeframes.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Dormice</p>	<p>It is noted that the Applicant has identified the need for a Protected Species license for Dormice.</p> <p>The PEIR (Volume 1, Appendix 3.1) indicates that a draft dormouse licence application and Method Statement will be produced for the final Environmental Statement.</p> <p>Given the ongoing status of ecological survey we recommend a draft licence application is submitted at the pre-application stage to ensure any licencing issues are resolved prior to examination and avoid delays at the application or examination stage.</p> <p>Following the review of the draft licence application, Natural England will either: provide a Letter of No Impediment (LONI); or if there are licencing issues to address, these will be set out in writing for the Applicant to resolve. Only when all matters are resolved, following review of a subsequent draft licence application, can a LONI be issued. Any LONI will be sent to the Applicant to provide within the application for examination, in line with Advice Note 11: Annex C – Natural England and the Planning Inspectorate.</p> <p>This would be chargeable under the existing Undefined Scope Contract between the Applicant and Natural England.</p>	<p>Natural England</p>	<p>The Applicant met with Natural England dormice and bat protection specialists on 21 October 2024 to discuss licencing requirements for the Proposed Development. The Applicant noted that draft protected species licences would be submitted to Natural England for agreement post application following the completion of supplementary surveys (following delayed land access).</p> <p>Natural England noted no in-principle objection to the timeframes for provision of draft licences and associated Letters of No Impediment, noting that these matters would need to be reviewed and agreed during the pre-examination and examination timeframes.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Post-consent surveys</p>	<p>Where further post-consent surveys (for example in the circumstance of bats and otters, where further survey is only proposed pre-construction, not to inform the ES) reveal the need for a licence from Natural England, we advise this will need to be applied for in the usual manner.</p> <p>Natural England is unable to provide a position on the likelihood of a licence being granted without having reviewed a draft licence application.</p>	<p>Natural England</p>	<p>This is noted. The Applicant will conduct pre-construction surveys for mobile species will be undertaken. Where post-consent surveys reveal the need for a license from Natural England, the Applicant will apply as required.</p>	<p>N</p>

<p>Bats</p>	<p>Natural England notes that the PEIR (Volume 1, Appendix 3.2) identifies a single tree with a roost used by small numbers of soprano pipistrelles adjacent to the HDD work site situated to the southwest of the Torridge Estuary. This is of concern to Natural England.</p> <p>Lighting in the vicinity of a bat roost could constitute an offence since it can cause disturbance and potential abandonment of the roost. It can also prevent bats from emerging which may lead to entombment and death.</p> <p>Further consideration of this is required in the Application and we advise using our PSS Service.</p>	<p>Natural England</p>	<p>Mitigation for areas in vicinity of bat roosts are set out in Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1) and would be detailed in the On-CEMP (and where appropriate, in draft licence applications).</p> <p>This includes avoidance of woodland habitat within design of the Proposed Development, minimisation of width of gaps required in hedgerows for HVDC cable installation, reinstatement of all sections of hedgerow removed for HVDC cable route and road widening improvements on 'like for like' basis, and additional enhancement of hedgerows along Onshore HVDC cable corridor and creation of new Devon hedgerows and woodland habitats as part of the landscape design for the Converter Site.</p> <p>Further bat roost (tree climbing) surveys have been undertaken on trees with potential roosts. Due to the timing of the surveys, the data has not yet been included in the application submission and this was discussed with Natural England on 21 October 2024. The supplementary information will be provided to Natural England as part of any application for a bat protected species licence during the pre-examination period and the supplementary survey details will be updated in the relevant DCO application documents during the examination period.</p> <p>The Applicant met with Natural England dormice and bat protection specialists on 21 October 2024 to discuss licencing requirements for the Proposed Development. The Applicant noted that draft protected species licences would be submitted to Natural England for agreement post application following the completion of supplementary surveys (following delayed land access). Natural England noted no in-principle objection to the timeframes for provision of draft licences and associated Letters of No Impediment, noting that these matters would need to be</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
			reviewed and agreed during the pre-examination and examination timeframes.	
Bats - surveys	<p>Whilst Natural England welcomes that surveys have been undertaken from February through to November inclusive, we are noting that bat species including the rare Greater Horseshoe Bat are becoming more active in winter due to the warmer winters.</p> <p>Therefore, we advise that further surveys should be undertaken in December 2024 and January 2025 to understand bat usage and ensure mitigation measures are fit for purpose. All surveys will need to cover foraging and not just flightlines.</p>	Natural England	<p>The Applicant has engaged with Natural England representatives during the pre-application process, particularly in relation to survey progress and the need for supplementary surveys including winter surveys, which have now been planned.</p> <p>The Applicant met with Natural England dormice and bat protection specialists on 21 October 2024 to discuss licencing requirements for the Proposed Development. The Applicant noted that draft protected species licences would be submitted to Natural England for agreement post application following the completion of supplementary surveys (following delayed land access). Natural England noted no in-principle objection to the timeframes for provision of draft licences and associated Letters of No Impediment, noting that these matters would need to be reviewed and agreed during the pre-examination and examination timeframes.</p> <p>Further detail is provided in Section 1.7 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Breeding birds	For breeding bird species that may be found along the cable route, such as kingfisher, barn owl, Natural England has standing advice. Erection of screening and beginning works before nests are built would help reduce any impact.	Natural England	<p>Details of screening, buffers and lighting measures are included in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1) and would be detailed in the On-CEMP. In particular, Table 1.14 of this Chapter outlines the specific mitigations adopted. Screening will act as a visual and sound barrier to reduce impacts from HDD operations.</p> <p>Construction works would be managed in accordance with an Onshore CEMP, which includes management measures for ecology. The Onshore CEMP would be developed in accordance with the Outline Onshore CEMP (Document 7.7) included with the DCO application.</p>	N

<p>Ancient Woodland and Ancient/Veteran Trees</p>	<p>Natural England notes that complete access to all areas of the Proposed Development for detailed survey has not been possible at this point, so it has not yet been possible to definitively address ancient woodland or veteran trees.</p> <p>Work so far indicates none will be affected, but this will be finalised and included within the ES, along with any avoidance/mitigation measures which may become necessary, if they are identified.</p> <p>We draw your attention to the revised ancient woodland maps (available on www.magic.gov.uk) which indicates an area of ancient woodland within the cable corridor at Hallsannery/the River Torridge Crossing which is currently not shown on Volume 2 Figure 1.1 Study Area.</p> <p>We advise that the ES should include an assessment of the effects of the Proposed Development on ancient woodland and veteran trees, where significant effects are likely to occur, and explain the effort made to avoid effects on ancient woodland and veteran trees, and increased fragmentation of these habitats. Measures to fully mitigate direct and indirect effects of the Proposed Development on ancient woodland, veteran trees, or other irreplaceable habitats should be clearly described and appropriately secured.</p> <p>Reference should be made to the joint Natural England and Forestry Commission standing advice for ancient woodland and veteran trees.</p>	<p>Natural England</p>	<p>Revised ancient woodland maps have been considered in Volume 2, Appendix 1.2 of the Environmental Statement (Document Ref: 6.2.1.2). Impacts on woodland and trees is considered in Section 1.10 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>Arboricultural surveys have now been completed where required and the results are presented in the Tree Survey Report and Arboricultural Impact Assessment (Document Ref. 6.4.2.6) presented in Volume 2 of the Environmental Statement. This identifies areas of ancient woodland and veteran trees.</p> <p>There are no areas of ancient woodland or replanted ancient woodland within the Proposed Development. None of the trees within or adjacent to the Proposed Development have been classified as Veteran or Ancient based on their structure and size. Further details are provided in Volume 4, Appendix 2.6: Tree Survey Report and Arboricultural Impact Assessment of the ES (Document Ref: 6.4.2.6)</p> <p>The boundary of one block of ancient woodland adjoins the boundary of the Proposed Development at Hallsannery. A minimum buffer of 15m will be created between the working area and the boundary of the ancient woodland through Heras fencing.</p> <p>Additional native tree and shrub planting is proposed to create a new woodland habitat alongside this existing ancient woodland. This is presented in Volume 2, Figure 1.4 of the Es (Document Ref: 6.2). Further details on proposed planting is included within the Outline Landscape and Ecology Management Plan (LEMP) (Document Ref: 7.10).</p> <p>Construction works would be managed in accordance with an Onshore CEMP, which includes management measures for ecology. The Onshore CEMP would be developed in</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
			accordance with the Outline Onshore CEMP (Document 7.7) included with the DCO application.	
BNG	<p>Natural England welcomes the commitment expressed in the PEIR to 'providing at least 10% biodiversity net gain (BNG) measured using the statutory biodiversity metric'.</p> <p>Whilst BNG for Nationally Significant Infrastructure Projects (NSIPs) is not yet mandatory, securing BNG reflects the important role NSIPs play in delivering the Government's environmental targets.</p>	Natural England	<p>The Proposed Development is not subject to a mandatory net gain requirement under the Environment Act 2021. Nevertheless, the Applicants have engaged with statutory consultees to discuss the approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit. The Applicant clarified its position with regard to biodiversity net gain with Natural England in a meeting on 6 June 2024, noting its ongoing commitment to exploring opportunities for net gain outside of the Order Limits. The Natural England representatives noted the current inability for the Applicant to compulsorily purchase land for BNG and welcomed the ongoing commitment to biodiversity enhancement within the Order Limits and the commitment to exploring opportunities for BNG outside of the Order Limits.</p> <p>Approach to biodiversity enhancement is set out in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), section 1.8. This includes habitat creation at the Converter Site, including features which increase connectivity with habitat features beyond the site. This also provides mitigation habitat for protected species such as dormice, bats and breeding birds.</p> <p>This approach is also present in habitat creation areas to be formed in blocks to either side of the Torridge Estuary and further hedgerow enhancements along the HVDC cable route.</p> <p>The Applicant is also continuing discussions with landowners and the North Devon Biosphere about additional opportunities for contributing to biodiversity enhancement schemes in the local area.</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>BNG</p>	<p>Natural England is supportive of a landscape scale approach to delivering BNG and increasing the area and connectivity of Atlantic rainforests, hedgerows, scrub and species-rich grassland in the locality, as previously discussed with you under our Discretionary Advice Service. We note you have identified potential BNG 'creation' off site (Vol 2 Fig 1.3), that you are seeking to tie in with appropriate local initiatives. We look forward to receiving further detail on this.</p>	<p>Natural England</p>	<p>The Proposed Development is not subject to a mandatory net gain requirement under the Environment Act 2021. Nevertheless, the Applicants have engaged with statutory consultees to discuss the approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit. The Applicant clarified its position with regard to biodiversity net gain with Natural England in a meeting on 6 June 2024, noting its ongoing commitment to exploring opportunities for biodiversity net gain outside of the Order Limits. The Natural England representatives noted the current inability for the Applicant to compulsory purchase land for BNG and welcomed the ongoing commitment to biodiversity enhancement within the Order Limits and the commitment to exploring opportunities for BNG outside of the Order Limits.</p> <p>Approach to biodiversity enhancement is set out in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), section 1.8. This includes Atlantic Rainforest habitat creation at the Converter Site, including features which increase connectivity with habitat features beyond the site. This also provides mitigation habitat for protected species such as dormice, bats and breeding birds. This approach is also present in habitat creation areas to be formed in blocks to either side of the Torridge Estuary and further hedgerow enhancements along the HVDC cable route.</p> <p>The Applicant is also continuing discussions with landowners and the North Devon Biosphere about additional opportunities for contributing to biodiversity enhancement schemes in the local area.</p>	<p>N</p>

<p>BNG</p>	<p>A biodiversity gain plan template for NSIPs is not yet available, so we would advise completion of the biodiversity gain plan, which is mandatory for major developments. A habitat management and monitoring plan should also be provided, showing how onsite and offsite gains will be managed and monitored for a minimum term of 30 years.</p>	<p>Natural England</p>	<p>The Proposed Development is not subject to a mandatory net gain requirement under the Environment Act 2021. Nevertheless, the Applicants have engaged with statutory consultees to discuss the approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit. The Applicant clarified its position with regard to biodiversity net gain with Natural England in a meeting on 6 June 2024, noting its ongoing commitment to exploring opportunities for biodiversity net gain outside of the Order Limits. The Natural England representatives noted the current inability for the Applicant to compulsory purchase land for BNG and welcomed the ongoing commitment to biodiversity enhancement within the Order Limits and the commitment to exploring opportunities for BNG outside of the Order Limits.</p> <p>Approach to biodiversity enhancement is set out in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), section 1.8. This includes Atlantic Rainforest habitat creation at the Converter Site, including features which increase connectivity with habitat features beyond the site. This also provides mitigation habitat for protected species such as dormice, bats and breeding birds. This approach is also present in habitat creation areas to be formed in blocks to either side of the Torridge Estuary and further hedgerow enhancements along the HVDC cable route.</p> <p>The management of landscaping and ecology mitigation and enhancement would be undertaken in accordance with the requirements of the Landscape and Ecology Management Plan (LEMP) developed in accordance with the Outline LEMP (Document Ref. 7.10) submitted with the DCO application.</p> <p>The Applicant is also continuing discussions with landowners and the North Devon Biosphere about additional opportunities for contributing to biodiversity enhancement schemes in the local area. We are also in discussions with a landowner to</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
			provide a new area of woodland planting on the eastern side of the River Torridge (adjoining existing woodland) and the outcome of these discussions will be concluded during examination.	
Flood risk				
Mitigation	The current level of detail provided regarding mitigation measures to protect water quality is not sufficient to give us confidence that impacts on the environment will be minimised, and greater detail should be provided within the DCO submission.	Environment Agency	<p>Further detail has been provided through Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).</p> <p>The assessment and the proposed mitigation measures have taken into account the requirements of the River Basin Management Plan (RBMP) and WFD (see Volume 2, Appendix 3.2: Onshore Water Framework Directive Assessment of the ES) to ensure all potential impacts on the water environment are mitigated to within acceptable levels.</p> <p>The Applicant met with representatives from the Environment Agency's water quality team on 12 August 2024 to discuss resolution of water quality concerns since the PEIR submission, which have been incorporated into the ES assessment. Further detail is included in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Drainage strategy	The drainage strategy for operational drainage from the Converter Site and Substation has not been provided. The Outline Operational Drainage Strategy should detail the mitigation measures that will minimize the risks to water quality. These must be sufficient to reduce the risk of pollution from spills, or from firewater in the event of a fire.	Environment Agency	<p>The Applicant met with representatives from the Environment Agency's water quality team on 12 August 2024 to discuss resolution of water quality concerns since the PEIR submission, which have been incorporated into the ES assessment. Further detail is included in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).</p> <p>An Outline Operational Drainage Strategy (Document Ref. 7.22) is now provided with the DCO application. The Environment Agency agreed that construction phase drainage requirements would be included in the Onshore CEMP, developed in accordance with the Outline Onshore CEMP (Document Ref. 7.7).</p>	N
Flood risk	It is not possible to comment on the appropriateness of certain flood risk mitigation proposals until the underlying assessments have been carried out. e.g. the proposed depth of the cable crossings beneath the watercourses, has been provided, but until the underlying geology has been established it is not possible to comment on the appropriateness of these proposals.	Environment Agency	<p>The Applicant met with representatives from the Environment Agency's water quality team on 12 August 2024 to discuss resolution of water quality concerns since the PEIR submission, which have been incorporated into the ES assessment.</p> <p>Further detail is included in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3). Details of proposed cable crossing depths are included in Volume 1, Chapter 3: Project Description (Document Ref. 6.1.3).</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Flood risk	<p>The assessment of flood risk does not consider climate change. The assessment of flood risk is over-reliant on the Flood Map for Planning, which is only intended as a planning tool to identify areas of risk and are not sufficient to base the entire assessment of flood risk on. Further assessment of potential impact of climate change is required.</p>	<p>Environment Agency</p>	<p>Climate change is considered in the Flood Risk Assessment (Document Ref: 6.2.3.1) and Volume 4, Chapter 1: Climate Change of the ES (Document Ref: 6.4.1).</p> <p>Climate change has been taken into account in the characterisation of the baseline and future baseline environment of Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).</p> <p>The approach to assessment was the subject of a number of meetings with the Environment Agency and the exchange of a technical note detailing the methods and data to be used.</p>	<p>N</p>
Cable crossing	<p>There is no justification supporting the proposed 1.5m minimum depth for cable crossing beneath the hard bed of any watercourses. Cable crossings may affect the stability of river banks or, in the case of the River Torridge, the construction and stability of the flood defences. Further justification as to why the 1.5m minimum cable depth is considered sufficient is required.</p> <p>Following completion of ground investigation works to determine the bed level of the River Torridge we would encourage further discussion on the location and depth of any cable crossings.</p>	<p>Environment Agency</p>	<p>The Applicant met with representatives from the Environment Agency on 12 August 2024 to discuss resolution of PEIR comments, including flood defence.</p> <p>The anticipated depth of the River Torridge crossing was discussed with the Environment Agency and the Commitments Register (Document Ref. 6.1.3.1) updated to provide anticipated crossing depths for the River Torridge, Kenwith Stream and the tributary to Jennett's Reservoir.</p> <p>Details of the cable route including the indicative depth along each section of route are detailed in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3). Ground investigation surveys of the River Torridge are ongoing and the results of these surveys would be discussed with the Environment Agency upon finalisation.</p> <p>The minimum trenchless crossing depth for all other watercourse crossings would be ascertained at detailed design stage and a factor of safety incorporated within engineering calculations to account for climate change impacts to peak watercourse flows and rates of incision.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Flood risk	<p>Flood risk has not been adequately assessed. There is no assessment to demonstrate that development will avoid the 1 in 100 year, (plus an allowance for climate change), flood extent. The future flood risk posed to/by the development may be underestimated resulting in insufficient flood risk mitigation measures. It must be demonstrated that no permanent above-ground development will be located within the 1 in 100yr fluvial flood extent, including an allowance for climate change.</p> <p>A lack of existing EA flood models should not be interpreted as a lack of fluvial flood risk. Where flood risk data, including climate change, does not exist, it is the responsibility of the developer to undertake this assessment and ensure there is sufficient data to inform their FRA.</p>	Environment Agency	<p>The Applicant submitted two technical notes to the Environment Agency in May and October 2024 detailing flood risk data limitations, the assessment approach of flood risk to the development and anticipated impacts from an increase in peak river flow and sea level rise as a result of climate change.</p> <p>The Environment Agency agreed to the approach which has since been incorporated within the Flood Risk Assessment and has been submitted as part of the DCO application.</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Flood risk	<p>The risks of construction on existing flood defences have not been adequately addressed. The risk of flooding to the surrounding area and to the construction works may be increased and opportunities for flood risk mitigation may be overlooked. The CEMP should include consideration of flood risk:</p> <ul style="list-style-type: none"> • Plans for the storage of construction materials outside of the flood zone • Flood defence vibration monitoring • Surveys for any works close to a flood defence to better understand defence's geometry, condition, composition and structure • (If appropriate) details of any construction phasing to ensure there is no loss in flood storage at any point during construction. 	Environment Agency	<p>Plans for the storage of construction materials outside of the flood zone have been incorporated within the Outline On-CEMP, which forms part of the application for development consent (Document Ref: 7.7). This also sets out consideration of flood risk in Table 1.2, including the potential for damage to flood defences. Use of trenchless techniques, flood control measures, pollution control measures, and implementation of buffer zones, is proposed as mitigation.</p> <p>HDD (or other trenchless technology) entry and exit points would be located at least 8m away from Environment Agency ordinary watercourses, 8m from Environment Agency surface watercourses or the landward toe of the surface watercourse flood defences, and 16m from a tidal Main River or sea defence structure.</p> <p>The following buffers would be maintained between watercourses and temporary working areas for the Onshore HVDC Cable Corridor, HVAC Cable Corridors, temporary compounds, and the Converter Site:</p> <p>8m away from the banks of ordinary watercourses; 8m from EA Main Rivers and the landward toe of associated formal and informal flood defences (non-tidal); and 16m from tidal EA Main Rivers and the landward toe of associated formal and informal flood defences.</p>	N
Geology, hydrogeology and ground conditions				
Water resources	<p>The impacts on water resources have not been assessed.</p> <p>Consumptive uses of water during construction phase and any associated impacts have not been assessed. Thus the environmental consequences are unknown.</p>	Environment Agency	<p>The assessment and the proposed mitigation measures have taken into account the requirements of the Environment Agency's River Basin Management Plan (RBMP) and Water Framework Directive (WFD) to ensure all potential impacts on the water environment are mitigated to within acceptable levels</p>	

Topic	Summary of comments	Body	Response	Design change (Y/N)
			<p>(see Volume 2, Appendix 3.2: Onshore Water Framework Directive Assessment of the ES).</p> <p>Impacts assessed are presented within sections 3.10, 3.11 and 3.12 within Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).</p> <p>Estimates of water used by the construction of the Proposed Development have not been made to date. Management measures for all resources used in the construction project will be contained within the Site Resources and Waste Management Plan which is an appendix to the Outline onshore Construction Environmental Management Plan (On-CEMP) (Document Ref: 7.7).</p>	
Groundwater	<p>The potential extent of heat generated by High Voltage Direct Cables on groundwater and any resulting impact on private water supplies has not been assessed. The presence of private water supplies is not yet known, and these could be affected by heat.</p>	<p>Environment Agency</p>	<p>The potential impact of heat generated by cables on groundwater quality in aquifer units is considered within paragraphs 4.11.23 to 4.11.26 of Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions of the ES (Document Ref: 6.2.4).</p> <p>It is anticipated that any heat dissipation will be localised and confined to the areas immediately surrounding the onshore HVDC cables. On this basis, it is unlikely that there will be any impact on the quality or temperature of groundwater at its point of abstraction during operation. This impact is therefore excluded from further consideration.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Pollution risks</p>	<p>Issue: Measures to manage pollution risks have not been established.</p> <p>Impact: Risk of detrimental impact on the environment. Failure to consider measures at an early stage increases the risk that the project encounters issues with treatment during the construction phase.</p> <p>Solution: Provide an Outline Pollution Prevention Plan and Outline Construction Drainage Strategy which incorporates mitigation to limit the impacts from contaminated runoff.</p> <p>The Outline Construction Drainage Strategy should assess the efficacy of proposed surface water treatment systems and should ensure that sufficient space for treatment is provided within the proposed red line boundary.</p>	<p>Environment Agency</p>	<p>The Outline On-CEMP (Document Ref: 7.7) has been updated to include management measures for pollution risks. This includes the development of an Outline Pollution Prevention Plan (Document Ref: 7.7).</p>	<p>N</p>

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<p>Surface water</p>	<p>The impact from surface water run-off from across the site has not been adequately assessed.</p> <p>Contaminated Surface water run-off can pose a significant risk to water quality and the environment. If it is not considered, then potential impacts could be underestimated, or the mitigation may be insufficient.</p> <p>The impact of surface water run-off across the site should be incorporated into the assessment.</p>	<p>Environment Agency</p>	<p>The Outline Operational Drainage Strategy has been submitted with the DCO application (Document Ref: 7.22).</p> <p>The existing site is currently fully greenfield. Surface water runoff arising from proposed impermeable areas are to drain to attenuation basin SuDS features prior to discharging to a watercourse within the order limits at the QBAR greenfield runoff rate. Additional SuDS features that could be implemented as part of the drainage strategy for the Converter Site are to be assessed at the detailed design stage. Due to underlying ground conditions, infiltration techniques are not expected to be feasible, subject to confirmation via further Ground Investigation at the detailed design stage.</p> <p>Surface water attenuation requirements include a 50% climate change allowance uplift. Pollution mitigation is to be provided via oil interceptors and attenuation basin SuDS features. Any exceedance flows are to be stored on site to prevent an increase in flood risk downstream. Appropriate management and maintenance to the drainage network is to be undertaken throughout the operational phase of the development by a specialist management company, with details to be confirmed during the detailed design stage.</p> <p>With the implementation of the above, it is demonstrated flood risk will not be increased elsewhere, accounts for the predicted impacts of climate change and ensures no reduction in floodplain capacity.</p> <p>An Outline Pollution Prevention Plan (Document Ref: 7.7.1) has been provided as part of the application for development consent. This details the pollution prevention measures to be considered during the construction phase of the Proposed Development. Furthermore, the Outline On-CEMP (Document Ref: 7.7) includes a section on the Construction Drainage Strategy to be developed.</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
Water abstraction	Abstractions have not been included as a potential sensitive receptor to pollution. Local abstractions should be identified and considered as potential receptors.	Environment Agency	Abstractions have been included as a potential sensitive receptor to pollution, as detailed within the Outline On-CEMP (Document Ref: 7.7).	N
Water abstractions	<p>Provide assessment of the management of dewatering activities, including details of locations, quantity and quality.</p> <p>Provide an evaluation of whether soakaways or discharges to surface water will be used which would make this process non-consumptive; together with consideration of any potential impact on receptors.</p> <p>Such an assessment would increase the likelihood of an abstraction licence to be granted (if it does not meet the criteria for low risk, short term exemption).</p>	Environment Agency	<p>Abstractions have been added as a receptor within 'the impact of contaminated runoff on the quality of surface water and ground receptors' of Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).</p> <p>No water abstractions are to be required as part of the Proposed Development.</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Water abstractions	<p>The requirement for consents/permits relating to dewatering activities has been identified as Tertiary mitigation. However, no other water demands anticipated during the construction have been identified. Consumptive uses of water during construction can include on-site concrete production, dust suppression, wheel washing, or potable/domestic supply to workforce on-site. Failure to identify all potential water supply demands and the associated licence requirements, can result in lengthy project delays due to the licence determination process. Solution: Provide assessment of the impacts of abstraction from surface/ groundwater (or the use of public water supply). Understanding potential restrictions affecting design will help to expedite the permitting process ahead of the construction phase.</p>	<p>Environment Agency</p>	<p>Abstractions have been added as a receptor within 'the impact of contaminated runoff on the quality of surface water and ground receptors' of Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3). No water abstractions are to be required as part of the Proposed Development.</p>	<p>N</p>
Unsuspected contamination	<p>Paragraph 4.15.1 states that intrusive ground investigations will be undertaken, and the findings will be used to verify the levels of risk and inform the requirement for any site remediation required. It goes on to say, in paragraph 4.15.2 that work will be carried out to, “identify the location and extent of Private Water Supplies as part of the work for the ES with further assessment as necessary”. We welcome both recommendations. We are likely to request that a requirement regarding how unsuspected contamination is managed should be included in the Development Consent Order.</p>	<p>Environment Agency</p>	<p>A Discovery Strategy would be prepared forming part of the On-CEMP. This is detailed within Table 4.20 of Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions of the ES (Document Ref: 6.2.4).</p> <p>A request to Torridge District Council for further details with respect to Private Water Supply data is pending. The Outline On-CEMP (Document Ref: 7.7) provides a methodology for further risk assessment, should information on private water supplies (e.g. location and nature) become available.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Watercourses</p>	<p>We support report's recommendation that watercourses should be returned to their baseline condition if impacted by works, but there is no recorded commitment to deliver this.</p> <p>Watercourse crossings could result in modification to their morphology, e.g. altering the structure or gradient of the banks or increasing watercourse encroachment.</p> <p>Provide commitment to restore watercourses to baseline conditions, (or provide suitable mitigation elsewhere along the watercourse should the works result in permanent changes).</p>	<p>Environment Agency</p>	<p>Methods for crossing water courses are detailed in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3). Further details are set out in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).</p> <p>Where the cable route crosses the River Torridge and the larger watercourses at Kenwith Stream and Jennett's Tributary at West Ashridge, trenchless techniques such as HDD would be implemented to reduce the potential impact as far as possible by passing under the river and associated terrestrial habitats. This is secured in the Commitments Register (Document Ref. 6.1.3.1) and the Works Plans (Document Ref. 2.3).</p> <p>The Onshore HVDC Cable Corridor does cross other drainage ditches for which works would be governed by the management measures identified in the Onshore CEMP (as developed in accordance with the Outline Onshore CEMP (Document Ref. 7.7) and land drainage permits which will also set out mitigation and restoration requirements for any crossings. These drainage ditches have been identified as generally dry. The requirement to prepare land drainage permits is detailed in the Other Consents and Agreements document (Document Ref. 7.21).</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Watercourses	<p>Cable installation under Kenwith Stream may become exposed over the lifetime of the project due to bed incision.</p> <p>Impact</p> <p>Exposed cable may interfere with river natural processes.</p> <p>Solution</p> <p>Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. Evaluate possibility of removal of cabling on decommissioning.</p>	Environment Agency	<p>Details of the cable route including the depth along each section of route are detailed in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p> <p>The crossing depth of HDD will be determined by the depth of suitable rock as identified during supplementary ground investigation surveys. The anticipated crossing depth at Kenwith Stream is 5m below the watercourse.</p> <p>The Applicant considers the anticipated crossing depth beneath these watercourses to be sufficiently deep as to avoid the risk of exposure by erosion over time.</p> <p>Any requirement for the removal of the cable duct and associated cable as part of decommissioning will be reviewed as part of the development of the Decommissioning Strategy following an appropriate assessment to determine the environmental impacts associated with removal of the cable and duct. This assessment will be undertaken prior to decommissioning.</p>	N
Typographical error	Unclear text refers to the Mermaids Pool to Rowden Cut SSSI (open coast rocky shore), but then describes the saltmarsh and mudflats of the Torridge Estuary. These two geologies are in separate locations.	Environment Agency	This is noted as a typographical error and has been corrected in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Coal	<p>A part of the site lies in an area of coal outcrops which may have been subject to workings at shallow depth. If shallow workings are present these may pose a potential risk to surface stability and public safety. There is also a mine entry recorded on the edge of this area, related to extraction of Mineral Black.</p> <p>The recorded coal features are located in the area of the connection points and convertor stations. Any built development in these areas will need to consider the potential risks posed by past coal mining activity, and any measures necessary to ensure the safety and stability of the development.</p>	The Coal Authority	<p>The impact from historical mining activities has been scoped out as identified within Table 4.7 of Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions of the ES (Document Ref: 6.2.4). The area of a construction compound is indicated to be at potential risk of underground mining, with a conjectured location of a coal (culm) seam present at outcrop. Whilst a detailed coal mining risk assessment is not considered a requirement with underground conditions not likely to be difficult, it is recommended that a visual inspection of the area around the identified outcrop is undertaken as part of the ground investigation by a suitably qualified and experienced person to identify any currently identifiable mining related settlement or subsidence effects.</p> <p>The north of the converter station, and Alverdiscott Substation Site are classed as areas with potential for restricted sporadic non-coal mining, however there is no historical map evidence to indicate that any historical mining activities have occurred, and the risk presented by non-coal mining is considered to be low.</p> <p>The conjectured location of the culm seam in this area will be targeted as part of the ongoing ground investigation and will be assessed when finalising the site layout. Consultation with the Coal Authority will be maintained on this matter.</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Historic environment				
Archaeology	National Character Area: 149, The Culm identifies that much below ground archaeology may remain undiscovered in this undeveloped area. Within the locality, the earliest human occupation dating to the Mesolithic is located at Westward Ho!. Many aspects of the proposed development including the Converter Site, Cable Route, sub-station, haul roads, utility diversions and construction compounds, have potential to impact on archaeology and palaeo-environmental remains.	Historic England	Volume 2, Chapter 2: Historic Environment of the ES (Document Ref: 6.2.2), Section 2.7 describes the significance of heritage assets affected by the Proposed Development, with additional information presented in Volume 2, Appendix 2.1: Historic Environment Desk-based Assessment of the ES (Document Ref: 6.2.2.1) and Volume 2, Appendix 2.4: Settings Assessment of the ES (Document Ref: 6.2.2.4). The research and fieldwork undertaken to date have not identified any deposits of geoarchaeological or palaeoenvironmental interest that could be impacted by the Proposed Development.	N

<p>Scheduled Monument: Iron Age enclosure and Roman marching camp (National Heritage List Entry No 1004558)</p>	<p>The Converter Site is located approximately 160m east of a Scheduled Monument: Iron Age enclosure and Roman marching camp (National Heritage List Entry No 1004558), an asset of the highest significance according to the National Planning Policy Framework. The elevated position of this strategic defensive site adds to its significance and we are therefore concerned about the potential for the proposed development to harm the significance of this asset as a result of development in its setting. The information available to assess this impact is currently limited.</p> <p>As set out in the policy section below, the Applicant will need to show how the mitigation hierarchy has been applied to the proposed development, giving priority to the avoidance of impacts in the first instance. In decision making, great weight will be given to the conservation of heritage assets. We would therefore welcome more information about the rationale for selecting the Converter Site and for the locations of converter buildings and construction areas within this site.</p> <p>We appreciate that the local topography comprising of winding sunken lanes bordered by hedgerows, valleys and combes means there is limited intervisibility between the scheduled site and the current substation. However, the proposed Converter Stations, which are closer than the existing sub-station to the Scheduled Monument, would each comprise of a solid mass of considerable scale and height, in stark contrast to their rural setting. A more detailed and robust assessment of their impacts on the setting of the</p>	<p>Historic England</p>	<p>A detailed assessment of the likely harm to the significance of this Scheduled Monument is presented within Volume 2, Appendix 2.4: Settings Assessment of the Environmental Statement (Document Ref: 6.2.2.4). This has been informed in part by visualisations that show how the Converter Site could appear in views from this Scheduled Monument.</p> <p>The Applicant discussed potential impacts on the Scheduled Monument setting during meetings on 26 June 2024 and 23 September 2024. A draft copy of the Settings Assessment was provided to Historic England on 29 October 2024 for early sight prior to the DCO application submission.</p> <p>The results of this assessment are set out in Section 1.9.7 of the Appendix. Due to the visual impact of the Proposed Development, in addition to the potential for construction noise and dust impacts, the magnitude of the impact on the setting of the Scheduled Monument is assessed as medium adverse.</p> <p>The significance of effect would be moderate or major adverse. Given that there is no physical harm to the Scheduled Monument and that much of the setting would remain unchanged, it is considered that the effect would be of moderate adverse significance, which is significant.</p> <p>Proposed mitigation on the setting of the Scheduled Monument is based on landscape mitigation (landscape bunding) which will be designed in consultation with Historic England. The requirement to consult Historic England is secured by Requirement 4 in Schedule 2 of the draft DCO (Document Ref. 3.1).</p> <p>The detailed design of the Converter Site will be developed in accordance with the requirements of the Design Principles Statement (Document Ref. 7.4).</p>	<p>N</p>
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	<p>monument will therefore be needed as part of the Environmental Statement.</p> <p>The Converter Site has an area of some 37 hectares and will include a range of associated works and infrastructure including cut and fill levelling, bunding, planting, security fencing, lighting, aerals etc. All of these elements have the potential to harm the setting of the Scheduled Monument.</p> <p>We would expect visualisations to illustrate and inform assessment of the level of harm to this and potentially other heritage assets. Zone of Theoretical Visibility modelling and site survey should be used to identify appropriate viewpoints and we would welcome further engagement on proposed viewpoints in relation to the Scheduled Monument.</p> <p>We note that Volume 1, Chapter 3 Project Description (3.7.17) states that the structure and design of the converter station buildings, including the built form and external materials, will be developed alongside consultation and stakeholder feedback, and that a Design Code will be developed to support the application for development consent.</p> <p>We suggest that this should consider matters such as orientation, shape, height, roof lines, materials, colours and lighting (which is highlighted for inclusion at 3.7.38). We would also therefore welcome further engagement on design development for the Converter Site. In addition to this, we request that the Applicant considers whether there are opportunities for enhancement of,</p>			
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Topic	Summary of comments	Body	Response	Design change (Y/N)
	<p>or contributions towards investigation, interpretation and recording of the Scheduled Monument, or other heritage assets, including assets on the Heritage at Risk register that are close to the proposed development.</p>			
Listed buildings	<p>The majority of the Listed Buildings that are affected by the development are grade II and would largely be subject to temporary setting impacts during construction. We therefore do not wish to comment on potential impacts / methodologies in relation to Listed Buildings at PEIR stage, and recommend that advice is sought from the conservation specialist at Torridge District Council.</p>	Historic England	<p>This is noted.</p> <p>Designated heritage assets potentially affected by the Proposed Development are listed in Table 2.12 of Volume 2, Chapter 2: Historic Environment of the ES (Document Ref: 6.2.2). ES and shown in Volume 2, Figure 2.2 of the ES. An asset-by-asset assessment of potential impacts arising from change within the settings of heritage assets is presented within Volume 2, Appendix 5.4: Settings Assessment of the ES (Document Ref: 6.2.2.4).</p> <p>The Applicant has met with the Torridge District Council heritage team on a number of occasions during the pre-application stage.</p>	N
Listed buildings	<p>Until such time as a detailed heritage impact assessment supported by a settings study and visualisations is available, it is not possible to determine with certainty whether any highly graded Listed Buildings will be affected. Historic England will need to consider that information before reaching any conclusions on the extent of impact.</p>	Historic England	<p>Designated heritage assets potentially affected by the Proposed Development are listed in Table 2.12 of Volume 2, Chapter 2: Historic Environment of the ES and shown in Volume 2, Figure 2.2 of the ES. An asset-by-asset assessment of potential impacts arising from change within the settings of heritage assets is presented within Volume 2, Appendix 5.4: Settings Assessment of the ES (Document Ref: 6.2.2.4).</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
General	<p>Historic England acknowledges that the proposed onshore Cable Route and Converter Site will avoid direct physical impacts on designated heritage assets and that in some locations HDD will be used to mitigate impacts on areas of known heritage interest.</p> <p>We also acknowledge that the detailed design and associated Environmental Impact Assessment is at an early stage.</p> <p>However, we are concerned that the Historic Environment Assessment (PEIR Chapter 2, Volume 2) assesses the impact of the proposed converter station, sub-station and grid connection as major adverse during both construction and operation.</p>	Historic England	<p>Designated heritage assets potentially affected by the Proposed Development are listed in Table 2.12 of Volume 2, Chapter 2: Historic Environment of the ES (Document Ref: 6.2.2) and shown in Volume 2, Figure 2.2 of the ES. An asset-by-asset assessment of potential impacts arising from change within the settings of heritage assets is presented within Volume 2, Appendix 5.4: Settings Assessment of the ES (Document Ref: 6.2.2.4).</p> <p>Construction works would be managed in accordance with an Onshore CEMP, which includes management measures for historic environment. The Onshore CEMP would be developed in accordance with the Outline Onshore CEMP (Document 7.7) included with the DCO application.</p> <p>The operational impacts on the heritage setting will be mitigated as far as reasonably practicable by the landscaping scheme which includes landscaped bunds and other planting. Details of the indicative landscape masterplan are provided in the Outline Landscape and Ecology Management Plan (Document Ref. 7.10)</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Alternatives – converter station</p>	<p>Bearing in mind the requirements of the EIA Regulations to describe the reasonable alternatives considered, along with policies in National Policy Statements EN-1 and EN-5 on reasonable alternatives, routing, and application of the mitigation hierarchy, has enough been done to identify and assess alternative locations for the Converter Site that may have a lesser environmental impact? We believe that considerable further work is needed on the detailed design of the Converter Stations, including their siting, scale, height, orientation, landscaping, lighting etc.</p>	<p>Historic England</p>	<p>Details of the project development and consideration of options are provided in Annex 2 of the Planning Statement (Document Ref. 7.2).</p> <p>Additional details are also provided in Volume 1, Chapter 4: Needs and Alternatives of the ES (Document Ref. 6.1.4).</p> <p>The location at which the Proposed Development would connect into the National Grid has been informed by an assessment undertaken by the National Grid Electricity System Operator (NGESO) which identified the Alverdiscott Substation Site as the most appropriate location for the Proposed Development to connect into the National Grid. The Applicant undertook supplementary assessments (included as appendices to Volume 1, Chapter 4: Need and Alternatives (Document 6.1.4) to the NGESO assessment to confirm the Alverdiscott Substation Site was the most appropriate option. The NGESO and Applicant's assessments all included South Wales connection points in their assessments.</p> <p>A Design Principles Statement (Document Ref. 7.4) has been submitted with the application for development consent. The Design Principles Statement will ensure the Converter Station adopts a landscape and architectural led design that is sympathetic to the surrounding area and uses appropriate materials, colours and finishes.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Cumulative effects	Are there any other proposals such as renewable energy or electrical network infrastructure, that plan to connect with the sub-station at Alverdiscott, and that could result in cumulative effects, e.g. in relation to additional sub-station capacity, battery storage or new pylons and overhead cables?	Historic England	<p>The assessment of likely cumulative impacts is presented in section 2.13 of Volume 2, Chapter 2: Historic Environment of the ES (Document Ref: 6.2.2).</p> <p>The Alverdiscott Substation Connection Development is located within the Order Limits for the Proposed Development. Construction of the Proposed Development is likely to occur ahead of any works associated with the Alverdiscott Substation Connection Development, thus it is assumed that the loss of, or harm to, buried archaeological remains and deposits of geoarchaeological and palaeoenvironmental interest will have been fully addressed ahead of such works. Construction of the Alverdiscott Substation Connection Development would therefore not result in any cumulative effects in respect of the loss of, or harm to, buried archaeological remains and deposits of geoarchaeological and palaeoenvironmental interest.</p> <p>The solar farm at Webbery Barton and Cleave Farm is located partially within the Order Limits for the Proposed Development. Where construction of the solar farm has occurred ahead of any works associated with the Proposed Development, it is assumed that the loss of, or harm to, buried archaeological remains and deposits of geoarchaeological and palaeoenvironmental interest will have been fully addressed ahead of that construction. Works associated with the Proposed Development would therefore not result in any cumulative effects in respect of the loss of, or harm to, buried archaeological remains and deposits of geoarchaeological and palaeoenvironmental interest.</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Winscott Barton	We note the commitment to mitigate impacts on a site of potential archaeological interest at Winscott Barton through Horizontal Directional Drilling. Expert archaeological advice should be sought on the methodology for this mitigation measure.	Historic England	<p>The design of the HDD crossing at Winscott Barton includes consideration of archaeological issues. This commitment to HDD crossing of the site is contained in the Commitments Register (Document Ref: 3.1).</p> <p>The HDD entrance and exits pits and any compounds may be subject to further archaeological evaluation once the exact location of the pits and compounds have been identified by the construction contractor. The depth of the HDD beneath the area of archaeological interest will be set such that the drill remains lower than the base of the enclosure ditch as recorded in the trial trenches here.</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Converter site mitigation measures</p>	<p>We note the proposed mitigation measures for the Converter Site in relation to (i) cut and fill earthworks, (ii) landscape planting to be detailed in an Outline LEMP, and (iii) design of the converter buildings including a Design Code to be secured as a requirement of the DCO.</p> <p>In relation to the latter, architectural design is mentioned, along with materials, colours and finishes.</p> <p>We request that this is expanded to specifically require consideration of how impacts can be mitigated through siting, orientation, shape, height, roof lines and sensitive lighting design.</p> <p>We note that according to the Project Description (Volume 1, Chapter 3) operational outdoor lighting at the Converter Site boundary would normally be restricted to motion-activated security lighting and will be secured through the Design Code (3.7.37).</p>	<p>Historic England</p>	<p>A detailed assessment of the likely harm to the significance of this Scheduled Monument is presented within Volume 2, Appendix 2.4: Settings Assessment of the ES (Document Ref: 6.2.2.4). This has been informed in part by visualisations that show how the Converter Site could appear in views from this Scheduled Monument.</p> <p>The Applicant discussed potential impacts on the Scheduled Monument setting during meetings on 26 June 2024 and 23 September 2024. A draft copy of the Settings Assessment was provided to Historic England on 29 October 2024 for early sight prior to the DCO application submission.</p> <p>Proposed mitigation on the setting of the Scheduled Monument is largely based on landscape mitigation (landscape bunding) which will be designed in consultation with Historic England.</p> <p>The requirement to consult Historic England on elements of the design relevant to its function is secured by Requirement 4 in Schedule 2 of the draft DCO (Document Ref. 3.1). The detailed design of the Converter Site buildings and landscaping will be approved by Torridge District Council in accordance with Requirement 4 of the Draft DCO (Document Ref. 3.1).</p> <p>The detailed design of the Converter Site will be developed in accordance with the requirements of the Design Principles Statement (Document Ref. 7.4) which includes requirements for the architectural design of the Converter Site.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Outline WSI	We would be pleased to have an opportunity to comment on the Outline Written Scheme of Investigation prior to submission. This document should cover pre-construction works (such as archaeological, geoenvironmental or habitat creation works) as well as the surveys and archaeological mitigation required during construction.	Historic England	The outline Onshore Written Scheme of Investigation (WSI) (Document Ref: 7.8) will apply to preliminary activities that involve excavation where appropriate. There is a planned scheme of trial trenching that will be undertaken in advance of finalising the outline WSI.	N
OLEMP	It would be helpful if Historic England had an opportunity to review and comment on the Outline Landscape and Ecology Management Plan prior to submission, bearing in mind that this will include details of mitigation planting at the Converter Site.	Historic England	Historic England is listed as a consultee in the outline Landscape and Ecology Management Plan (oLEMP) (Document Ref: 7.10). The detailed design of the Converter Site inclusive of its scheme of earth modelling will be controlled by a Requirement of the DCO (Requirement 4). The local planning authority will consult as it feels appropriate on the submitted scheme for approval.	N
WSI	We welcome the commitment within this document to the preparation of an Outline Onshore and Intertidal Written Scheme of Investigation. It will be important that this document sets out overarching methods and approaches for all archaeological works, including construction and pre-construction works and the mechanism for development, consultation, approval and monitoring of site-specific Written Schemes of Investigation. We look forward to receiving these at the earliest opportunity.	Historic England	An Outline Onshore Written Scheme of Investigation (WSI) (Document Ref. 7.8) and Outline Offshore WSI (Document Ref 6.3.7.5) are included with the DCO application.	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Visualisations	We note that according to Table 2.1 no representative visualisations relating to heritage assets have been included in the PEIR. We acknowledge that the design is not yet finalised. It will be important that at submission and examination the DCO is supported by an ES containing visualisations that illustrate the impact on the Iron Age enclosure and Roman marching camp Scheduled Monument, including a visualisation from the monument itself. The significance of views across the landscape from the Scheduled monument including any intervisibility with other monuments should be considered.	Historic England	<p>A detailed assessment of the likely harm to the significance of this Scheduled Monument is presented within Volume 2, Appendix 2.4: Settings Assessment of the ES (Document Ref: 6.2.2.4). This has been informed in part by visualisations that show how the Converter Site could appear in views from this Scheduled Monument.</p> <p>The results of this assessment are set out in Section 1.9.7. Due to the visual impact of the Proposed Development, in addition to the potential for construction noise and dust impacts, the magnitude of the impact on the setting of the Scheduled Monument is assessed as medium adverse.</p> <p>The significance of effect would be moderate or major adverse. Given that there is no physical harm to the Scheduled Monument and that much of the setting would remain unchanged, it is considered that the effect would be of moderate adverse significance, which is significant.</p>	N
Methodology	We welcome confirmation within the methodology that reference has been made to Historic England guidance documents.	Historic England	This is noted.	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Heritage assets</p>	<p>We welcome confirmation in the PEIR (Volume 2, Chapter 2, Para 2.5.2) that according to the information available at this stage, no designated heritage assets would be directly physically impacted by the construction, operation and maintenance of the proposed development. However, owing to their considerable scale and height, Figure 2.3 illustrates the large number of heritage assets within the Zone of Theoretical Visibility (ZTV) of the converter stations, and the close proximity and likely intervisibility with the Iron Age enclosure and Roman marching camp Scheduled Monument is a key concern.</p>	<p>Historic England</p>	<p>The assessment of impacts and effects is presented within Sections 2.10 to 2.12 of Volume 2, Chapter 2: Historic Environment of the ES (Document Ref: 6.2.2). It confirms that no designated heritage assets would be directly physically impacted by the construction, operation and maintenance, or decommissioning of the Proposed Development.</p> <p>A detailed assessment of the likely harm to the significance of the Iron Age enclosure and Roman marching camp Scheduled Monument is presented within Volume 2, Appendix 2.4: Settings Assessment of the ES.</p> <p>The results of this assessment are set out in Section 1.9.7. Due to the visual impact of the Proposed Development, in addition to the potential for construction noise and dust impacts, the magnitude of the impact on the setting of the Scheduled Monument is assessed as medium adverse.</p> <p>The significance of effect would be moderate or major adverse. Given that there is no physical harm to the Scheduled Monument and that much of the setting would remain unchanged, it is considered that the effect would be of moderate adverse significance, which is significant.</p> <p>Mitigation would be in the form of best practice to minimise the impacts of construction noise, dust and lighting, which would be implemented through the On-CEMP and associated management plans (Document Ref: 7.7), but these measures would not reduce the significance of effect which would remain as moderate adverse. This effect would be medium-term and reversible.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Construction	<p>Within the PEIR (Volume 2, Chapter 2) Paragraph 2.8.18 suggests that following construction, land will be reinstated to its former use leaving no noticeable trace above ground. However, as we stated in our Scoping Response, where impacts (including setting impacts) are associated with vegetation loss, and in particular loss of mature trees, mitigation in the form of new tree planting can take many years to be fully effective. We suggest that this is acknowledged here, and also at paragraph 2.8.40.</p>	Historic England	<p>No veteran trees will be removed for the construction, operation and maintenance, or decommissioning of the Proposed Development.</p> <p>There are mature trees at risk from the permanent highways improvements carried out on the unnamed road to Littleham near its junction with the A386, the double tree line opposite Woodville Farm (along Gammaton Road) and also potentially at the narrowing of the minor road that runs between Gammaton Cross and Webbery Cross. There are some trees lost at the Converter Site too. Where practicable, the Onshore HVDC Cable Corridor will be micro-sited to avoid individual trees within hedge-lines.</p> <p>This is considered in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), Section 1.10.</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Construction	<p>We question the suggestion at 2.8.31 and subsequently at 2.9.7 that construction of the converter stations is potentially 'fully reversible'. If this installation is likely to be in place for 25+ years then this is a considerable length of time and we do not think that reversibility is likely to be an acceptable argument. Alternatively, clarification may be needed about what aspects of the converter station development are being assessed in association with its 'construction', and what aspects form part of its 'operation'.</p>	Historic England	<p>The assessment of impacts and effects considers factors such as magnitude, direction, frequency and reversibility, based on the guidance set out within Volume 1, Chapter 5: Environmental Impact Assessment Methodology of the ES (Document Ref: 6.1.5)</p> <p>It should be noted that within the assessment presented within Sections 2.10 to 2.12 of Volume 2, Chapter 2: Historic Environment (Document Ref. 6.2.2), the reversibility (or otherwise) of an impact does not affect the assessed magnitude of the impact or the consequent significance of the effect.</p> <p>It is an established legal principle that the concept of reversibility does not include any judgement regarding the likelihood of the reversal taking place – it is simply that the impact is capable of being reversed (cf. Buxton v Cambridge City Council [2021] EWHC 2028 (admin)).</p> <p>The assessment of construction impacts presented within section 2.10 of Volume 2, Chapter 2: Historic Environment (Document Ref. 6.2.2) considers all aspects of the construction within the Converter Site, including the mitigation measures, and covers issues such as construction noise and lighting.</p> <p>The assessment of operation and maintenance impacts presented within Section 2.11 within the ES chapter considers all aspects of the operation of the converter stations, including operational noise and lighting, also the continuing growth of vegetation with regard to the mitigation measures.</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Approach to assessment	We note that asset by asset assessments will be included in the Environmental Statement. We therefore wish to reiterate a key message from our Scoping Response, acknowledged within the PEIR, that it will be important that the tabular approach to assessing heritage impacts is supported by a reasoned, narrative discussion of the significance of heritage assets and the level of impact and harm.	Historic England	The assessment of impacts and effects is presented within sections 2.10 to 2.12 of Volume 2, Chapter 2: Historic Environment of the ES (Document Ref: 6.2.2), with additional detail provided in Volume 2, Appendix 2.4: Settings Assessment of the ES.	N
Converter station design	Within the PEIR (Volume 2, Chapter 2) Paragraphs 2.8.33, 2.8.36 and 2.9.12 refer to further detailed design work to consider not just the design of the converter stations themselves but also their location within the site, the lighting design and landscaping including earth bunds and planting. Should the current proposed site be confirmed as the preferred option, we would welcome further engagement on these matters with the aim of avoiding or reducing impacts on designated heritage assets arising from changes within their settings.	Historic England	The Applicant has made provision for consultation with Historic England during the development of the detailed design for the Converter Site. Requirement 4 in Schedule 2 of the draft DCO (Document Ref. 3.1) makes provision for Torridge District Council to consult with Historic England on matters related to its function in the process of approving the detailed design for the Converter Site.	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Approach to assessment	Question the suggestion within the PEIR (Volume 2, Chapter 2, Paragraphs 2.8.34 and 2.9.10) that impacts would generally be reversible and suggest that this aspect of the assessment is reconsidered.	Historic England	<p>The assessment of impacts and effects considers factors such as magnitude, direction, frequency and reversibility, based on the guidance set out within Volume 1, Chapter 5: EIA Methodology of the ES.</p> <p>It should be noted that within the assessment presented within Sections 2.10 to 2.12 of Volume 2, Chapter 2: Historic Environment (Document Ref. 6.2.2), the reversibility (or otherwise) of an impact does not affect the assessed magnitude of the impact or the consequent significance of the effect.</p> <p>It is an established legal principle that the concept of reversibility does not include any judgement regarding the likelihood of the reversal taking place – it is simply that the impact is capable of being reversed (cf. Buxton v Cambridge City Council [2021] EWHC 2028 (admin)).</p>	N
Approach to assessment	Query the suggestion within the PEIR (Volume 2, Chapter 2, Paragraphs 2.8.41 and 2.9.10) that impacts are of local spatial extent, and suggest that the findings of the settings study and further visualisations will be needed to establish this.	Historic England	This text has been amended within the assessment of impacts and effects presented within Sections 2.10 to 2.12 of Volume 2, Chapter 2: Historic Environment (Document Ref. 6.2.2), and now suggests that the effect would be of regional spatial extent.	N
Trial trenching	While we weren't offered the opportunity to comment on the Written Scheme of Investigation for trial trench evaluation, given that further evaluation is required it would be useful if we were able to provide comment now as this will reduce potential risks to the project and increase our evidence base for decision making as the scheme develops.	Historic England	The Applicant will engage with Historic England prior to the commencement of Phase Two of the trial trenching surveys.	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Trial trenching	Within Appendix 2.3: Preliminary Trial Trenching Report, there are a number of discrete features characterised as either pits or postholes and linear ditches left unexcavated without explanation. It is often not possible to confidently assess the archaeological potential of a feature without some level of excavation. We would recommend a more inclusive excavation strategy in the next phase of work.	Historic England	This is noted. The decisions taken during fieldwork regarding which features should be examined were taken in consultation with the Devon County Council HET in their capacity as archaeological advisor to the Local Authority.	N
Trial trenching	With reference to Appendix 2.3: Preliminary Trial Trenching Report, without investigation and assessment, mitigation should treat the possible cremations in Trench 79 as human and a specific cremation excavation strategy that adheres to the relevant guidance should be included and implemented within the Outline Written Scheme of Investigation to accompany the DCO.	Historic England	This issue is addressed within the Outline Onshore Written Scheme of Investigation (Document Ref: 7.8). In the event of the discovery of human remains, these will be left in situ and not further examined. The applicant's appointed representative(s) will be informed immediately along with the Historic Environment Team (HET) at Devon County Council (DCC). A recognised specialist should visit the site to provide further advice. If removal of human remains is necessary, a license will be obtained from the appropriate authorities (currently the Ministry of Justice) by the archaeological contractor and all conditions attached to that license will be complied with. All excavation and post-excavation work regarding human remains will be undertaken in line with the standards set out in the Institute of Field Archaeologists (IFA) Technical Paper No. 13 (McKinley and Roberts 1993). The draft Development Consent Order (Document Ref: 3.1) sets out the process that will be followed in relation to human remains interred less than 100 years ago.	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Trial trenching</p>	<p>DCMS Policy Statement: Scheduled Monuments and nationally important but non-scheduled monuments (2013) sets out the policy for nationally significant sites. By default, sites that comprise only groups of objects (artefacts or ecofacts) or other deposits that provide evidence of human activity during early prehistory cannot usually be designated as Scheduled Monuments because they do not satisfy the 1979 Act's definition of a monument, despite potentially being of high significance and national or international importance.</p> <p>With reference to Appendix 2.3: Preliminary Trial Trenching Report, given the significance of the early Neolithic features and the potential for finds to have high archaeological potential we would expect a more refined excavation and environmental sampling strategy for mitigation, as well as potentially identifying areas for further exploration that would otherwise be missed, such as the palaeo-environmental and finds that may be contained within the undated features.</p>	<p>Historic England</p>	<p>Noted – this issue is additionally addressed through footnote 72 of the NPPF:</p> <p><i>“Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets”</i></p> <p>The Outline Onshore Written Scheme of Investigation (Document Ref: 7.8) sets out the requirements for further investigation.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Trial trenching	<p>With reference to Appendix 2.3: Preliminary Trial Trenching Report, provision should be made in the Outline Written Scheme of Investigation for the potential to process a more representative array of environmental samples if needed to answer the aims and objectives of the project.</p> <p>It may be useful to consider the principles of the ClfA selection toolkit, which presents a useful resource for considering selection and retention in consultation with appointed specialists.</p> <p>In addition, it is noted that all of the samples fall below the recommended volumes for samples as set out in the Historic England guidelines. Though it can be appreciated that not all of these features may have produced a 40-60 litre sediment sample, there are a number of cases where it would be recommended.</p>	Historic England	<p>Noted – this is addressed within the Outline Onshore Written Scheme of Investigation (Document Ref: 7.8).</p> <p>The detailed archaeological investigations will be undertaken by one or more specialist archaeological contractors who will be Registered Organisations with the Chartered Institute for Archaeologists (ClfA). Procurement of the archaeological contractor(s) will be in accordance with the relevant ClfA standard and guidance (ClfA 2020a).</p> <p>The fieldwork, post-excavation, reporting and archiving will be managed by Members or Associated members of ClfA, and the ClfA Code of Conduct (ClfA 2022) will be adhered to at all times.</p> <p>Environmental sampling will be targeted upon potentially significant archaeological deposits or features and will predominantly examine sealed and well-dated contexts. Sample size will take into account the frequency with which material appropriate for sampling will occur, but bulk samples will normally be a minimum of 30 litres. Sampling strategies (on- and off-site) will principally derive from the appropriate guidance document (English Heritage 2011).</p>	N

<p>Trial Trenching</p>	<p>With reference to Appendix 2.3: Preliminary Trial Trenching Report, we agree with the recommendations at paragraph 7.20 that if further archaeological work takes place along the proposed development route that any of the remaining unprocessed evaluation samples that fall within the mitigation areas could be considered for processing.</p>	<p>Historic England</p>	<p>Noted – this is addressed within the Outline Onshore Written Scheme of Investigation (Document Ref: 7.8).</p> <p>The programme of post-consent archaeological work will comprise the detailed archaeological investigation of land within the Onshore Infrastructure Area where the results of the historic environment desk-based assessment, the archaeological geophysical survey and the programme of trial trenching indicate the presence of archaeological sites or features. These investigations will be undertaken ahead of the commencement of construction in the areas where the further archaeological work is required.</p> <p>Consultation will be undertaken with the HET at DCC to determine the number and locations of the areas where detailed archaeological investigation is required. If the agreed programme of archaeological trial trenching has not been completed ahead of the decision to allow the DCO, this may then lead to a staged approach to the determination of the number and locations of the areas where detailed archaeological investigation is required. Completion of the agreed programme of archaeological trial trenching would be a priority element of the programme of post-consent archaeological work.</p> <p>Prior to the commencement of the programme of post-consent archaeological work, a detailed Written Scheme of Investigation (WSI) will be submitted to, and agreed by, the HET at DCC. The WSI will clearly identify the areas to be investigated and will set out the justification in terms of the known and potential archaeology at each location. Site specific aims and objectives will be identified, with appropriate references to the South West England Archaeological Research Framework (https://researchframeworks.org/swarf/). If a staged approach to the determination of the number and locations of the areas where detailed archaeological investigation is required, then</p>	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
			<p>more than one WSI would be submitted to, and agreed by, the HET at DCC.</p> <p>No generic archaeological watching brief (monitoring of construction) is proposed, nor any areas where archaeological remains will be preserved in situ. Within each area of detailed archaeological investigation, consideration will be given regarding the potential for the in-situ preservation of significant archaeological remains should any such remains be identified. The outcome of the consideration will depend on the nature of construction activities at that location and also on the physical characteristics of the archaeological remains.</p>	
<p>Trial trenching</p>	<p>With reference to Appendix 2.3: Preliminary Trial Trenching Report, it would be beneficial to process a proportion of samples from securely dated features, to allow for better characterisation of the deposit in order to inform future research questions and on whether further analysis is required (e.g. charred plant remains).</p> <p>Assessing the palaeo-environmental potential of a greater number of undated features may contribute towards their characterisation and recommendation for scientific dating.</p>	<p>Historic England</p>	<p>Noted – this is addressed within the Outline Onshore Written Scheme of Investigation (Document Ref: 7.8).</p> <p>Environmental sampling will be targeted upon potentially significant archaeological deposits or features and will predominantly examine sealed and well-dated contexts. Sample size will take into account the frequency with which material appropriate for sampling will occur, but bulk samples will normally be a minimum of 30 litres. Sampling strategies (on- and off-site) will principally derive from the appropriate guidance document (English Heritage 2011).</p> <p>If archaeological deposits are found to have significant potential for the presence of palaeoenvironmental material, advice will also be taken from the HET at DCC on the need to extract, process and further examine environmental samples. Additional advice may be sought from the Science Advisory team at Historic England.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Future Engagement</p>	<p>In advance of submission and examination of the DCO, Historic England would welcome further engagement in relation to the following:</p> <ul style="list-style-type: none"> • The rationale for the location of the Converter Site including how the Applicant has identified and taken account of reasonable alternatives. • Further work (including a Design Code) on the siting and design of the converter stations, associated infrastructure and mitigation bunding/planting • Proposed viewpoints for visualisations to aid the assessment of impacts on the setting of the Iron Age enclosure and Roman marching camp Scheduled Monument. • The draft Outline Written Scheme of Investigation. • The draft Outline Landscape and Ecological Management Plan insofar as it relates to the Converter Site. • Trial trenching evaluation, in particular recommendations with regards to site specific sampling strategies. • Any potential archaeology of national significance that is identified through pre-construction assessments and evaluation. 	<p>Historic England</p>	<p>The Applicant has met Historic England representatives twice since the PEIR and will continue to engage with Historic England following the submission of the DCO application to resolve any remaining issues.</p> <p>We note that the Applicant has discussed points raised within the s42 commentary and welcomes the opportunity to receive and respond to further feedback on matters relating to their functions.</p> <p>The Applicant discussed potential impacts on the Scheduled Monument setting during meetings on 26 June 2024 and 23 September 2024. A draft copy of the Settings Assessment was provided to Historic England on 29 October 2024 prior to the DCO application submission.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Future Engagement	<p>PINS guidance suggests that Applicants should invite Historic England to participate through an Evidence Plan Process and to be involved in any Expert Technical Groups.</p> <p>The guidance note also recommends clarity about changes that are intended to be introduced post-PEIR consultation and prior to submission of a DCO application to the Planning Inspectorate.</p> <p>With this in mind, we would welcome further engagement with the Applicant following the PEIR as part of a Technical Group focusing on cultural heritage and including other expert stakeholders such as Devon County Council's Archaeologist and Torridge District Council's Conservation Officer.</p>	Historic England	<p>The Applicant discussed potential impacts on the Scheduled Monument setting during meetings on 26 June 2024 and 23 September 2024. A draft copy of the Settings Assessment was provided to Historic England on 29 October 2024 prior to the DCO application. submission.</p> <p>We note that proposed changes to the layout of the Converter Site, as assessed in Environmental Statement were discussed with Historic England representatives on 23 September 2024. We welcome the opportunity to receive and respond to further comments on matters relating to their functions.</p>	N
Human health				
Human health	<p>The Proposed Development does not fall within the consultation distances of any Major Hazard Installation(s) or Major Accident Hazard Pipeline(s). Please note if at any time a new Major Accident Hazard Pipeline is introduced or existing Pipeline modified prior to the determination of a future application, then the HSE reserves the right to revise its advice. Likewise, if prior to the determination of a future application, a Hazardous Substances Consent is granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed development, again the HSE reserves the right to revise its advice.</p>	Health and Safety Executive	This is noted.	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Land use and recreation				
Policy	<p>With reference to the PEIR (Volume 2, Chapter 8), we broadly agree with Table 8.2 however further consideration should be given to:</p> <p><i>NPPF 181 Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework...</i></p> <p><i>Footnote 62: Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.</i></p>	Natural England	<p>Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8) considers the potential effects of the Proposed Development on agricultural land, including Best and Most Versatile (BMV) agricultural land.</p> <p>The effects of the Proposed Development on agricultural land are presented in sections 8.10 - 8.12.</p> <p>The measures adopted as part of the Proposed Development to minimise impacts on agricultural land are set out in section 8.8 of the ES chapter.</p> <p>The relationship between the Proposed Development and paragraph 181 of the NPPF is addressed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>As highlighted in Table 2.4), the Proposed Development is a Critical National Priority for the UK. The Converter Site is not located within a nationally or locally designated landscape. The Offshore HVDC Cable Corridor makes landfall within a nationally designated landscape, but the impacts will be temporary, and the land returned to pasture once the construction works are complete.</p> <p>An Outline Landscape and Ecology Management Plan (LEMP - Document Ref: 7.10) has been submitted to show the landscape and ecological mitigation and enhancement used to minimise adverse impacts.</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
ALC – Cable route data	With reference to the PEIR (Volume 2, Chapter 8), Figure 8.2 and 8.2a shows only mapped ALC grades for the converter site, there is no detailed data presented for the cable route. Natural England advises that this data should be made available.	Natural England	<p>Figures are provided in Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8) to show the distribution of ALC grades based on data from a 2011 survey, undertaken by RPS.</p> <p>Figure 8.5, 'Provisional ALC Mapping', depicts ALC grades along the proposed cable route in addition to at the converter site.</p>	N
ALC – permanent loss of land	With reference to the PEIR (Volume 2, Chapter 8, Paragraph 8.4.15) Natural England supports the commitment to provide detailed ALC surveys for areas within the land use study area where there would be permanent loss of agricultural land associated with the converter stations. Advice on survey requirements should be regarded.	Natural England	<p>It has not been possible to access the areas of the Converter Site permanent land for ALC survey, however ALC data was available for a large proportion of the site from a previous 2011 survey undertaken by RPS. As a reasonable worst-case assumption, it has therefore been assumed that those areas of the Permanent Onshore infrastructure Area that have not been surveyed could comprise areas of the best and most versatile Subgrade 3a land, based on the 2011 survey data.</p> <p>Supplementary ALC surveys will be undertaken between late 2024 and early 2025 following anticipated access to the land proposed for the Converter Site.</p> <p>The results of soil and ALC survey work undertaken to date have informed the Outline Soil Management Plan (Document Ref: 7.7.4) submitted as part of the DCO application, which includes the commitment to undertaking further detailed soil survey of the land within the area of the Proposed Development to confirm the distribution of soil types to be affected during construction.</p>	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Outline Soil Management Plan</p>	<p>The temporary displacement of soil as a result of the underground cable installation, and construction of temporary haul and access roads/construction compounds could result in permanent land quality change and soil damage if undertaken inappropriately.</p> <p>Therefore, Natural England advises a commitment to consider disturbance impacts in the Outline Soil Management Plan (SMP). This is required for consultees and decision makers to understand the extent (ha) and likely long-term impacts on agricultural land quality (ALC grade).</p>	<p>Natural England</p>	<p>The Outline Soil Management Plan (Document Ref: 7.7.4) submitted as part of the DCO application contains measures to control stripping, storage and restoration of soils during the construction of the Proposed Development.</p>	<p>N</p>
<p>Soil damage</p>	<p>Natural England advises that there is a risk of soil damage, ALC degradation and long term or permanent loss of BMV from cable installation (grid route). Soil will need to be handled according to best practice and reinstated to a high standard to reduce the impacts. The results from a detailed ALC survey would provide soils data to inform a soil management plan for the whole site regardless of whether the use is permanent or temporary in nature.</p>	<p>Natural England</p>	<p>The results of soil and ALC survey work undertaken to date have informed the Outline Soil Management Plan (Document Ref: 7.7.4) submitted as part of the DCO application, which includes the commitment to undertaking further detailed soil survey of the land within the area of the Proposed Development to confirm the distribution of soil types to be affected during construction. The Outline Soil Management Plan (Document Ref: 7.7.4) has been prepared in accordance with recognised best practice guidance provided in the Department for Environment, Food & Rural Affairs (Defra) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra, 2009) and Institute of Quarrying (IoQ) Good Practice Guide for Handling Soils in Mineral Workings (IoQ, 2021). It is noted that although the IoQ guide is titled for use in mineral workings, it is applicable to all infrastructure projects, including long linear developments (e.g. onshore cable routes) particularly those where large volumes of soil are to be stripped, stored, and reinstated.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
ALC survey	<p>Natural England advises that a detailed ALC and soil survey of the agricultural land should be undertaken across the full Study Area to inform the EIA. This should normally be at a detailed level, e.g. one auger boring per hectare, supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres.</p> <p>Soil data collected as part of an ALC survey can also be used to inform the soil resource and management plan as set out in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. This type of survey requires an experienced ALC surveyor, in order to make the correct professional judgements and where to introduce flexibility.</p>	Natural England	<p>Published Soils information and Agricultural Land Classification (ALC) information for the Onshore Infrastructure Area is provided in Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8). The results of soil and ALC survey work undertaken to date have informed the development of the Outline Soil Management Plan (Document Ref: 7.7.4) submitted as part of the DCO application, which includes the commitment to undertaking further detailed soil survey of the land within the area of the Proposed Development to confirm the distribution of soil types to be affected during construction.</p>	N
ALC survey	<p>Natural England advises that the ES should present the detailed and semi-detailed ALC survey information. This should include a breakdown of the ALC grades (area, %) in relation to the Order limits and include ALC and soil data for the cable route and areas of permanent infrastructure and habitat enhancement.</p> <p>A breakdown of the proposed site into disturbed and undisturbed land categories should also be included, split by ALC grade, to help illustrate the potential for impact on agricultural land grade. This site specific detail is required to assist the decision maker to apply NPS EN-3 and make a decision.</p>	Natural England	<p>The results of soil and ALC survey work undertaken to date have informed the development of the Outline Soil Management Plan (Document Ref: 7.7.4) submitted as part of the DCO application, which includes the commitment to undertaking further detailed soil survey of the land within the area of permanent land take at the Converter Site confirm the distribution of soil types to be affected. The Outline Soil Management Plan will be updated if required following the completion of the supplementary ALC surveys undertaken in late 2024, early 2025.</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Outline Soil Management Plan	Natural England supports the provision of an Outline SMP (oSMP) which should be informed by site-specific soil information to inform suitable soil handling (Defra Construction Code of Practice (Defra, 2009)). The SMP should also set out the target specification for the proposed end uses. We advise that the target specification for the restored soils should be based on pre-construction ALC grade.	Natural England	The Outline Soil Management Plan (Document Ref: 7.7.4) submitted as part of the DCO application, contains measures to control stripping, storage and restoration of soils during the construction of the Proposed Development and has been informed by Defra Construction Code of Practice (Defra, 2009). The Outline Soil Management Plan will be updated if required following the completion of the supplementary ALC surveys undertaken in late 2024, early 2025.	N
Guidance	Natural England advises that it has published ALC survey guidance (Agricultural Land Classification detailed Post 1988 ALC survey, Bideford (ALCB02496)).	Natural England	This is noted.	N
Soil Association	According to the submitted red line boundary dataset Natural England cannot identify the following soil association within the submitted Order limits: (Powys series (Ph)) (Nercwys series (Nc)). This will need to be resolved in the Application.	Natural England	The relevant associations have been referenced in section 8.7 of Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8).	N
Data sources	Natural England advises that the Atlantic Array survey work undertaken by RPS should form part of this submission as it is a useful soil data source.	Natural England	The available survey data has been included in Volume 2: Appendix 8.1: Soil Survey and Agricultural Land Classification Data of the ES.	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Operational lifespan</p>	<p>Natural England notes that the proposed operational lifespan is assumed to be 50 years. However, there are provisions in place should the development not continue to be operational past this point.</p> <p>There needs to be a firm commitment to decommission the site after 50 years (or sooner if no longer operational), remove all infrastructure and equipment and return the land to its original condition and ALC grade.</p> <p>As part of this there should be a commitment to prepare and submit to the decision maker a detailed decommissioning plan to restore the site prior to the end of its operational use, as set out by NPS EN3.</p>	<p>Natural England</p>	<p>The impacts of the decommissioning phase of the Proposed Development have been assessed. The impacts arising from the operation and maintenance phase of the Proposed Development are listed in Table 8.16 in Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8), along with the maximum design scenario against which each impact has been assessed.</p> <p>A description of the likely effect on receptors caused by each identified impact is given below.</p> <p>During decommissioning, it is expected that the onshore HVDC and HVAC cables may be recovered by pulling the cables through the ducts. Otherwise, they will be left in place in the ground with the cable ends cut, sealed and securely buried as a precautionary measure. Cable ducts, joint bays and link boxes would be left in-situ, to minimise environmental disturbance.</p> <p>The operation of the proposed converter stations is intended to form permanent elements of electrical infrastructure serving the national grid, however as stated above, the minimum operational lifetime is currently assumed to be 50 years. It is likely that this operational lifetime could be extended through refurbishment and the replacement of equipment, rather than decommissioning.</p> <p>If the operation of the Proposed Development does not continue beyond 50 years, the proposed converter stations would be decommissioned. For the purposes of EIA, decommissioning of the proposed converter stations is assumed to be similar to the construction and in reverse sequence.</p> <p>No new areas of land take are envisaged to be affected through decommissioning and no additional effects are assessed beyond those already assessed during the construction stage.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Formatting	With reference to the PEIR, Volume 2, Chapter 8, Natural England notes that Figures 8.1; 8.2; 8.6 & 8.7 do not align with the figure presented in this document. We advise a numbering change for this document and any subsequent numbered references in other documents submitted as part of the ES.	Natural England	This is noted. Updates have been made to Volume 2 Chapter 8: Land Use and Recreation (Document Ref. 6.2.8) accordingly.	N
PRoW	Within 1km of the landfall and Onshore HVDC Cable Corridor there are a number of PRoW including the South West Coast Path National Trail and the Tarka Trail promoted path. With reference to the PEIR, both of these paths are expected to remain open during construction, operation and decommissioning of the Proposed Development, however this would apply only where HDD has been shown to be technically feasible and/or this is not still considered as part of the construction zone. Therefore, we request further information on contingency plans.	Natural England	Impacts upon PRoW and the Tarka Trail are considered within Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8). The Applicant has undertaken technical studies to confirm that the use of HDD at the landfall and River Torridge is technically feasible, and as such, is not proposing any contingencies for the HDD in these locations. The use of HDDs would ensure that there would be no physical effects on the coastal recreational asset, the South West Coast Path, the Tarka Trail or National Cycle Route 3.	N
Landscape and visual impact				
North Devon Coast National Landscape	Natural England notes that the Proposed Development is located within, and within the setting of the North Devon Coast National Landscape (AONB).	Natural England	This is noted. The effect on the North Devon Coast National Landscape (NL) is assessed in sections 2.10 and 2.11 of Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).	N
North Devon Coast National Landscape	It should be noted that Natural England provides advice on the landscape impacts of NSIP proposals on designated landscapes, however on wider landscape and seascape issues Applicants should obtain advice from LPAs and other local bodies.	Natural England	This is noted. Local Planning Authorities (hereafter, 'LPAs') and other local bodies have been included in assessments in sections 2.10 and 2.11 of Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
North Devon Coast National Landscape	Natural England advises that the application will need to provide due consideration of Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 and would also advise consulting with the National Landscape Partnership regarding viewpoints, visualisations and potential impacts.	Natural England	The Applicant has noted section 2.45 of the LU&R Act 2023 (see Table 2.1 in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2)). The Applicant notes the NDLC NL Partnership's concerns regarding the areas (some designated) that the proposed development crosses through.	N
North Devon Coast National Landscape	Further assessment is required before Natural England can reach a final conclusion on the significance of impacts on the North Devon Coast National Landscape.	Natural England	The effect on the North Devon Coast National Landscape (NL) is assessed in sections 2.10 and 2.11 of Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).	N
North Devon Coast National Landscape	Natural England welcomes the commitment to undergrounding the cables to avoid permanent impacts on the North Devon National Landscape (NL). The LSVIA relies on a number of such embedded mitigation measures to support the conclusion that there will not be a significant effect on the special qualities and setting. However, Natural England's view is that impacts on the NL at the landfall site and cable route are under assessed because of their temporary nature. Construction and full reinstatement of landscape features is likely to take longer than 5 years which would be considered medium term.	Natural England	The magnitude of impact of the construction phase of the proposed Converter Site was considered to be large on farmland characteristics, resulting in moderate adverse and significant effects on this key characteristic of the LCT. These effects are localised, medium term and temporary (with medium term defined as up to 5 years).	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>North Devon Coast National Landscape</p>	<p>The scoping out of the onshore cable route during operation is not clear and clarity is required over what is included in the construction phase and operational phase.</p> <p>After physical construction of the cable route, there will be a time lag during which reconstruction and reinstatement of the cable corridor is undertaken. Is it considered that this phase falls within the construction or the operational phase?</p> <p>Even after reinstatement measures have taken place, there will be a time period where impacts will still be apparent until reinstatement measures settle into the landscape/mature. Does this aspect not fall into the operational phase?</p>	<p>Natural England</p>	<p>The restoration of the Onshore HVDC Cable Corridor will be undertaken during the construction phase. The anticipated construction duration for the Onshore HVDC Cable Corridor is 36 months, finishing in 2030 leaving a period of at least two years to complete restoration works prior to operation of the project.</p> <p>Restoration of the construction corridor to its previous land use will be undertaken as soon as practicable following the completion of trenching works, leaving the haul road and areas around the cable pulling locations as the only remaining areas requiring restoration at the completion of cabling works.</p>	<p>N</p>
<p>North Devon Coast National Landscape</p>	<p>The NTS suggests an adverse effect on the characteristic landscapes, tranquillity and dark night skies of the North Devon Biosphere Reserve during construction and operation of the Proposed Development. We advise that this also applies to the North Devon NL, particularly for the special qualities of tranquillity, dark skies and panoramic views, wild coast scenery.</p>	<p>Natural England</p>	<p>The assessment of the impacts on the various landscape and seascape character areas is in sections 2.10 and 2.11 in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>The assessment of the impacts of the Proposed Development on the special qualities of the North Devon Coast NL are in sections 2.10 and 2.11 of this chapter. Nighttime effects on landscape character are assessed at sections 2.10 and 2.11. Nighttime effects on views and visual amenity are assessed at sections 2.10 and 2.11.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>North Devon Coast National Landscape</p>	<p>With reference to the PEIR (Volume 4, Chapter 2, Paragraph 2.5.49), Natural England considers that the sensitivity of the people using the local PRow network and Access Land for informal recreation is high because appreciation of the surrounding environment is a primary concern. However, those users of the South West Coast Path National Trail, as it crosses the North Devon Coast NL, are considered to have a very high sensitivity to change. This reinforces the likely impact on the NL.</p>	<p>Natural England</p>	<p>This is noted.</p> <p>The assessment of the impacts on the various landscape and seascape character areas is in sections 2.10 and 2.11 in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>The assessment of the impacts of the Proposed Development on the special qualities of the North Devon Coast NL are in sections 2.10 and 2.11 of this chapter.</p>	<p>N</p>

<p>North Devon Coast National Landscape</p>	<p>With reference to the PEIR (Volume 4, Chapter 2, Paragraph 2.8.11), the Applicant identifies the sensitivity of the NL special qualities as high, but the magnitude of impact as negligible. Natural England questions this assessment.</p> <p>The reliance on temporary impacts and geographical extent serves to underplay the significance. Short term impacts are classified as 0-5 years, but the landfall works will occur between 2026 and 2031 albeit in 2 phases over 6 years which would be medium term (Volume 4 appendix 2.4 section 1.7.22).</p> <p>Natural England's view is that the onshore cable route is likely therefore to cause medium term, temporary harm to the special qualities during the construction phase of the Proposed Development.</p> <p>Any harm to the natural beauty harms the purpose of the designation, and this cannot be reduced by claiming that the effect is limited in any way. Any assessment should determine impact on the special qualities and reason for designation of the landscape.</p> <p>The tranquillity of the NL can be experienced in motion, in the same way as views and the diversity of the landscape. The sound of construction in the tranquil landscape will reach further than the visible activity which may be screened from view and movement of construction vehicles and the sound they make will also have a significant effect on this special quality.</p> <p>The PEIR indicates that HDD works may require operations 24/7 and are therefore likely to require</p>	<p>Natural England</p>	<p>The HDD works at the landfall site are scheduled to be undertaken over a period of twelve months with an additional period of 6 months required for each of the cable pulling operations. The total anticipated duration of works at the landfall site is three years and not six years as indicated in the comment.</p> <p>Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2) has corrected the construction period to be medium-term and temporary.</p> <p>Duration is defined as:</p> <ul style="list-style-type: none"> • short term: a period of months, up to one year • medium term: a period of more than one year, up to five years • long term: a period of greater than five years. <p>A detailed study of the effects of the Proposed Development on the special qualities of the North Devon Coast NL has been undertaken in sections 2.10 and 2.11 of Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2). The relevant sections of the ES Chapter state that the significance of effects for the special qualities relevant to this assessment are as follows:</p> <ul style="list-style-type: none"> • “Diversity of scenery contained within a small area, including some of the finest cliff scenery in the country (as mentioned at designation)”: This high sensitivity resource would experience a negligible magnitude of impact. The temporary effect would be negligible adverse, which is not significant. • “Panoramic seascape, with seaward views to Lundy within the Atlantic Ocean, across the Bristol Channel to Wales and along the coastline. Views are of a landscape and seascape devoid of human influence”: This high sensitivity resource would experience a negligible magnitude of impact. The 	<p>N</p>
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Topic	Summary of comments	Body	Response	Design change (Y/N)
	lighting at night which again have implications for the special qualities of the NL.		<p>temporary effect would be negligible adverse, which is not significant.</p> <ul style="list-style-type: none"> • “Panoramic views across a rolling landscape of pastoral farmland, wooded combes and valleys from elevated inland areas”: This high sensitivity resource would experience a small impact. The temporary effect would be minor adverse, which is not significant. • “Wild coastal scenery. In the north, hogsback cliffs of varying heights; in the south high, rugged cliffs, dramatic rock formations, exposed headlands, wavecut platforms and rocky coves”: This high sensitivity resource would experience a negligible impact. The temporary effect would be negligible adverse, which is not significant. • “A strong sense of tranquillity and remoteness where the coast road is located away from the coastline”: This high sensitivity resource would experience a small impact. The temporary effect would be minor adverse, which is not significant. • “Dark night skies”: This high sensitivity resource would experience a negligible impact. The temporary effect would be negligible adverse, which is not significant. 	

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Photomontages	The PEIR (Volume 4, Chapter 2, Paragraph 1.12.20) states that fully rendered photomontages will be produced for the ES, from the agreed viewpoints using AutoCAD and Sketchup software, to provide an illustrative image of the appearance of the proposed converter stations and associated buildings and infrastructure. Regarding the daytime photomontages, modelled representations are combined with the baseline view photographs to create a photorealistic rendered photomontage image of the Proposed Development. This is welcomed by Natural England.	Natural England	This is noted. The photomontage visualisations are submitted as Volume 4, Appendix 2.5: Landscape Visualisations of the ES (Document Ref: 6.4.2.5).	N
North Devon Coast National Landscape	There may be more opportunities along the cable route for landscape and ecological enhancements to reinforce landscape character and the NL special qualities.	Natural England	This is noted. Discussions with the North Devon NL Partnership are ongoing. Responses to the opportunities signalled by the NDLC NL Partnership are outlined in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2). The Applicant has confirmed via email with North Devon NL Partnership that they will be invited to engage as part of the local design group proposed by the Applicant to review the relevant elements of landscaping design at the Converter Site.	N
North Devon Coast National Landscape	Opportunities should be taken to work closely with the North Devon NL Partnership to further reduce landscape and visual impacts where possible.	Natural England	The Applicant notes the NDLC NL Partnerships concerns regarding the areas (some designated) that the Proposed Development crosses through. Responses to North Devon NL Partnership's concerns are also outlined in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>North Devon Coast National Landscape</p>	<p>Much of any proposed additional mitigation, other than HDD, seems to be deferred to the proposed outline Landscape and Ecological Management Plan (LEMP).</p> <p>However, it is unclear at what stage the LEMP and the design code will be produced. This will be needed at an early stage so that Natural England and the National Landscape Partnership can assess the suitability of the proposals and therefore an Outline LEMP should be included with the Application.</p>	<p>Natural England</p>	<p>No construction works within the Landfall, Onshore HVDC cable corridor or Converter Site may commence until a LEMP has been developed for those areas and submitted and approval by Torrington District Council. The LEMP(s) must be developed in accordance with the Outline LEMP (Document Ref. 7.10).</p> <p>A Design Principles Statement (Document Ref. 7.4) has been submitted with the application for development consent. The Design Principles Document will ensure the Converter Station adopts a landscape and architectural led design that is sympathetic to the surrounding area and uses appropriate materials, colours and finishes.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>North Devon Coast National Landscape</p>	<p>Should there not be the technical feasibility to undertake mitigation that has been proposed at a high level at this stage, then assessment of significance of impacts may need to be revisited. Additionally, this could impact on the detail within the future DCO application.</p> <p>Without seeing further detail and feasibility of mitigation proposals, in particular for the pipeline construction and remediation, the scale and magnitude of impacts cannot be determined. Issues such as loss of hedgerows with reinstatement and any tree planting must be considered within the feasibility of reinstating these features, for example, tree planting cannot take place in the same location as the pipeline. This may lead to a long term and potentially irreversible impact on the special qualities of the North Devon NL.</p> <p>Time for reinstatement including the growth rate of reinstatement vegetation needs to be added to the timescale for the temporary nature and reversibility of the impacts. Factors impacting on the reinstatement /restoration timescale could well move into a more “long term” timescale which will impact the conclusions of the LSVIA in terms of significance.</p>	<p>Natural England</p>	<p>Assessment of impacts have been reviewed and revised in relation to mitigation measures currently available to the Proposed Development, rather than those alluded to during the PEIR stage.</p> <p>Discussions with the North Devon NL Partnership are ongoing.</p> <p>The effect on the North Devon Coast National Landscape (NL) is assessed in sections 2.10 and 2.11 of Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2). Of the effects identified during the construction phase, all are assessed to be temporary, and none are assessed to be significant effects in EIA terms.</p> <p>The overall effect on the relevant special quality of the North Devon Coast NL of the operational phase of the development is judged to be negligible adverse, which is not significant in EIA terms.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>North Devon Coast National Landscape</p>	<p>HDD or similar should be used to avoid impacts where hedgerows or other valuable ecological receptors are crossed to avoid severance across the landscape for the period of time that it would take for the habitat to be restored. This also fits with the avoid, mitigate, compensate hierarchy.</p>	<p>Natural England</p>	<p>The approach to ecological (and associated landscape) mitigation is set out in section 1.8 within Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), including reinstatement of Devon Hedgerows and enhancement of habitat to increase connectivity across landscape.</p> <p>In many cases, trenchless techniques such as Horizontal Directional Drilling (HDD) mean that it will be possible to cross important biological or geological sites with no direct impacts. The Proposed Development avoids direct impacts on ancient woodland and other important habitats by a combination of route avoidance and measures such as HDD which prevents direct impacts upon existing habitats.</p> <p>In all instances where hedgerows are crossed by the Onshore HVDC Cable Corridor, the hedgerows will be reinstated on a 'like-for-like' basis. Where feasible, hedgerow bank materials will be stored and re-used to form the reinstated banks for hedgerows, including viable woody species stools. Hedgerow reinstatement will include replanting with suitable species mixes tailored to replicate and enhance the diversity of the existing hedgerows, using appropriate native species of local provenance. A suitably experienced hedging contractor familiar with creation of Devon hedgerows will be appointed to complete this work.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>South West Coast Path National Trail and Tarka Trail</p>	<p>The LSVIA identified that people using the South West Coast Path and the Tarka Trail would experience temporary major adverse effects, which are significant.</p> <p>Works at the landfall site and cable route will be temporary and the land reinstated. Natural England concurs with the conclusion of significant impacts given the remote, quiet location.</p> <p>We consider that the landfall and cable route construction is likely to detract, in the short term, from the remote experience when travelling along this route.</p>	<p>Natural England</p>	<p>The potential effects of the Proposed Development on the coast and public rights of way are assessed in sections 8.10 - 8.12 of Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8).</p> <p>Measures adopted to limit adverse effects on Public Rights of Way are set out in section 8.8 of Volume 2, Chapter 8: Land Use and Recreation (Document Ref. 6.2.8).</p> <p>The construction of the landfall would be undertaken by HDD or other trenchless technique as would the onshore cable route works to cross the River Torridge. On this basis, the use of the Coastal Path and NCR 27 (Tarka Trail section) would remain unaffected during the construction period. There would therefore be a negligible impact in the physical accessibility of these routes.</p> <p>The assessment of the impacts on the various landscape and seascape character areas is in sections 2.10 and 2.11 in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2). The assessment of the impacts of the Proposed Development on the special qualities of the North Devon Coast NL are in sections 2.10 and 2.11 of this chapter. Nighttime effects on landscape character are assessed at sections 2.10 and 2.11. Nighttime effects on views and visual amenity are assessed at sections 2.10 and 2.11.</p>	<p>N</p>
<p>The King Charles III England Coast Path</p>	<p>The King Charles III England Coast Path (ECP) will follow the SWCP NT route along the coast. No additional mitigation would be required for this designation.</p>	<p>Natural England</p>	<p>This is noted.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
Location of assets				
Utilities	I have read the plans and documents and processing these details I have deduced that some of the project's order limits may fall within the vicinity of GTC assets. Please study the attached the images showing your works locations and our corresponding network drawings for the relevant areas and decide if our assets are within the order limits of your proposed works. The area shaded green on our site plan (onshore infrastructure area) has no conflicts with GTC assets but there are conflicts in the areas shaded grey (abnormal infrastructure load routes).	GTC UK Ltd	<p>The Applicant has reviewed the figures provided by GTC UK Ltd and confirms that the only potential interface between GTC assets and the Proposed Development is where assets are located under or adjacent to highways proposed to be used for the transport of abnormal infrastructure loads (AIL). Except for the removal and subsequent re-instatement of existing street furniture impacted by the transport of the AIL, there are no other works proposed that may affect existing GTC assets and as such no diversions are required.</p> <p>The Applicant will consult with relevant utility companies as part of the development and approval of the AIL permits to confirm there are no asset protection requirements for existing utility infrastructure within the proposed AIL route.</p>	N
Utilities	<p>NGET assets form an essential part of the electricity transmission network in England and Wales. Please continue to consult NGET in regards to this development.</p> <p>NGET will require an adequate form of Protective Provisions included within the Order.</p> <p>NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK.</p>	National Grid Electricity Transmission	<p>The Applicant has engaged with NGET in relation to draft Protective Provisions which are the subject of ongoing discussion prior to finalisation.</p> <p>The Applicant is also continuing ongoing engagement with NGET in relation to their assets and their planning and construction of the proposed upgrades at the existing Alverdiscott Substation Site.</p>	N
Utilities	National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset.	National Grid Electricity Transmission	This is noted. Appropriate Deeds of Easement/Wayleave will be agreed for any assets impacted by the Proposed Development.	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Utilities	Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 3 (2004).	National Grid Electricity Transmission	This is noted. The Applicant has engaged with NGET in relation to draft Protective Provisions which are the subject of ongoing discussion prior to finalisation. The Applicant has provided details of the Proposed Development to National Grid, including proposed locations of permanent structures.	N
Utilities	If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.	National Grid Electricity Transmission	This is noted. The Applicant has engaged with NGET in relation to draft Protective Provisions which are the subject of ongoing discussion prior to finalisation. Safe clearances for existing overhead lines will be maintained at all times.	N
Utilities	Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”)	National Grid Electricity Transmission	This is noted. The Applicant has engaged with NGET in relation to draft Protective Provisions which are the subject of ongoing discussion prior to finalisation. Safe clearances for existing overhead lines will be maintained at all times.	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
Utilities	If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	National Grid Electricity Transmission	<p>This is noted.</p> <p>The landscape scheme for the Converter Site is shown in the Outline LEMP (Document Ref: 7.10) submitted as part of the DCO application.</p> <p>Planting will be provided at the Converter Site to assist with softening and screening the buildings. The Outline LEMP includes:</p> <ul style="list-style-type: none"> • Strengthening and enhancement of existing hedgerow field boundaries within the vicinity of the Converter Site and at replacement hedgerows along the Onshore HVDC Cable Corridor. • Using native and locally appropriate plant species around Converter Site and at replacement hedgerows along the Onshore HVDC Cable Corridor. • Identifying areas where it may be possible to achieve advance planting. <p>Measures within it to provide mitigation for protected species are discussed in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), Section 1.8.</p> <p>Safe clearances for existing overhead lines will be maintained at all times.</p>	N
Utilities	Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation	National Grid Electricity Transmission	The Applicant has identified existing NGED electrical overhead lines and towers that require diversion and replacement as a result of the Proposed Development. These have been agreed in consultation with NGED. No other existing overhead line towers are affected by drilling or excavation works.	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Utilities	National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.	National Grid Electricity Transmission	The Applicant has identified existing NGED electrical overhead lines and towers that require diversion and replacement as a result of the Proposed Development. These have been agreed in consultation with NGED. An appropriate Deed of Grant, easement or wayleave agreement will be agreed with National Grid for any diverted assets within land owned or operated by the Applicant.	N
Utilities	Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.	National Grid Electricity Transmission	<p>The Applicant has identified existing NGED infrastructure requiring diversion within the Converter Site in consultation with NGED. NGED representatives have proposed suitable diversion routes which will be confirmed with NGED during the detailed design of the Converter Site.</p> <p>The Applicant has also engaged with NGED low voltage representatives to identify assets within the low voltage network which may be temporarily impacted by construction works within the Onshore HVDC cable corridor. The Applicant will continue to work with NGED during the detailed design of the proposed temporary compounds, cable corridor and HDD locations to confirm any requirements from NGED prior to commencing any work affecting those assets.</p>	N

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Traffic and transport				
Pedestrian access	<p>The Project creates an access road /haul track around Bideford from the coast to the Torridge and beyond, which will be removed once the cable installation is complete. Rather than removal and reinstatement, this would seem to provide an opportunity to provide a new link between the SW Coast Path and the Tarka Trail, with a new trail using some of your infrastructure combined with existing footpaths and tracks.</p> <p>The development of this trail would support multiple objectives in local health and well-being agendas.</p>	Littleham and Landcross Parish Council	The Applicant is required to return land over the onshore cable route to current landowners to continue their agricultural operations. Given this, the Applicant has not prepared proposals for the use of this land for footpaths or tracks. The development of any access routes for the public would need to be agreed with individual landowners.	N

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>Highways impacts</p>	<p>The lanes of the parish around the proposed construction area are currently under extreme pressure from ever increasing and cumulative levels of traffic from other recent and proposed major developments (solar panel installation, Waste management development etc). They were never designed to take even the current level of traffic and are already under extreme pressure with excessive damage and, at times, severe congestion at certain pinch points where there are no passing places. In the immediate area of the proposed site, there has been a very recent severe accident involving structural damage to a resident's property that could have had fatal consequences. This was as a result of a lorry ignoring the specified access routes to the adjacent solar panel site. Between Roundswell on the A39 and Torrington there exists a spider's web of lanes all leading off the B3232 that a satnav will identify as access to the proposed site.</p> <p>For this reason, the Alverdiscott & Huntshaw Parish Council (A&HPC) have serious concerns about secondary traffic in the form of XLinks and subcontractor employees, and couriers etc that will attempt to access the construction depot and site via any of the many unsuitable access points along the B3232.</p>	<p>Alverdiscott and Huntshaw Parish Council</p>	<p>An Outline Construction Traffic Management Plan (CTMP) (Document Ref. 7.12) has been submitted as part of the DCO application and a final CTMP will be adopted which will set out suitable construction vehicle routes to be adhered to.</p> <p>The Outline CTMP includes demand management measures during the construction phase of the Proposed Development such as encouraging car sharing between construction staff, has been prepared.</p> <p>All construction HGVs will be travelling on routes determined in the CTMP under strict traffic management control and warning signage will be used where relevant, for example at accesses to construction compounds, to alert other drivers of the construction traffic. The Applicant will work with its contractors to ensure appropriate signage such as 'No Access to XLinks Site' is placed in appropriate locations to guide construction traffic.</p> <p>Traffic routeing maps will be provided as part of induction materials for contractors, sub-contractors and their staff.</p> <p>During the construction process, the implementation of the measures within the final CTMP(s) will be monitored to ensure the measures are implemented correctly and that the measures remain effective.</p>	<p>N</p>

Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>CEMP/CTMP monitoring</p>	<p>A&HPC would request feedback and inclusion in your proposals details of:</p> <ol style="list-style-type: none"> 1) What measures you will use to effectively and safely manage access to the proposed site for ALL traffic and not just deliveries of major equipment and materials 2) The A&HPC would like appropriate signage, for example: “No Access to XLinks site” on all non-approved access roads 3) Instructions to NOT use Satnav to all those who may need access as Satnav’s may lead them onto unsuitable access points. 4) Appropriate maps provided when contracting / ordering goods etc. 5) Suitable penalties for employees and suppliers if these instructions are not followed. 6) Serious consideration of a temporary speed limit? 	<p>Alverdiscott and Huntshaw Parish Council</p>	<p>Details of the way that these issues will be managed during the construction phase of the Proposed Development are outlined in the Outline Onshore-CTMP (Document Ref:7.12).</p> <p>The Outline CTMP, includes demand management measures during the construction phase of the Proposed Development such as encouraging car sharing between construction staff, has been prepared.</p> <p>All construction HGVs will be travelling on routes determined in the CTMP under strict traffic management control and warning signage will be used where relevant, for example at accesses to construction compounds, to alert other drivers of the construction traffic. The Applicant will work with its contractors to ensure appropriate signage such as ‘No Access to XLinks’ site is placed in appropriate locations to guide construction traffic.</p> <p>Traffic routeing maps will be provided as part of induction materials for contractors, sub-contractors and their staff.</p> <p>During the construction process, the implementation of the measures within the final CTMP(s) will be monitored to ensure the measures are implemented correctly and that the measures remain effective.</p> <p>The Applicant will work with Devon County Council (DCC) as the relevant local highway authority to determine if any of the works areas require temporary reduction in speed limits, and this will be implemented in accordance with relevant traffic permits approved by DCC.</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
Road widening	<p>We are also concerned about the possible long-term effects of any road widening in the area that may encourage large vehicles to use the surrounding roads post construction. If the road is widened to the site and not reinstated, then the residents of the parish will be condemned to a future of heavy traffic using these lanes as short cuts to improve delivery schedules regardless of risk. A&HPC would request a more robust consultation with DCC and Devon Highways in conjunction with local consultation on the long term effects of increased traffic, of all types, using the narrow lanes from Gammaton Cross. We would welcome responses from the relevant authorities to our suggestions of a weight limit and speed limit on these roads for the long term safety of the local residents who have no choice but to use these lanes for access to services. We are already at risk from vehicles using these roads and are concerned that unless a long term solution is negotiated there will be a higher risk of RTA's in the surrounding area.</p>	<p>Alverdiscott and Huntshaw Parish Council</p>	<p>We are aware of and have discussed local concerns in regard to widening of the whole of Gammaton Road. The Applicant does not intend to widen the full extent of Gammaton Road, however as the detailed design for proposed 'pinch point' widening has not been completed, we need to retain the relevant rights to widen the road to support the future transit of AIL loads to the Converter Site along Gammaton Road.</p> <p>The detailed design of highways works on Gammaton Road will be progressed in consultation with local residents on Gammaton Road and DCC to address concerns about widening.</p> <p>Details of the proposed road widening and other highways improvements are considered in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5).</p>	<p>N</p>

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Topic	Summary of comments	Body	Response	Design change (Y/N)
<p>South West Coast Path National Trail and Tarka Trail</p>	<p>Natural England acknowledges that if the cables are laid under the path using HDD techniques there would be no requirement to close the Trails.</p> <p>However, advice of the National Trail Officer and/or the Coast Path Officer for North Devon should be sought to identify appropriate measures to mitigate adverse impacts. The National Trails website provides information including contact details for the National Trail Officers.</p>	<p>Natural England</p>	<p>This is noted.</p> <p>Impacts upon PRow and the Tarka Trail are considered within Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8). The use of HDDs would ensure that there would be no physical effects on the coastal recreational asset, the South West Coast Path, the Tarka Trail or National Cycle Route 3.</p> <p>Potential impacts on Public Rights of Way would be managed in accordance with the Outline Public Rights of Way Management Plan (Document 7.11) submitted with the DCO application.</p>	<p>N</p>

APPENDIX J-2: REGARD HAD TO STATUTORY CONSULTATION RESPONSES FROM CONSULTEES UNDER S42(1)(B)

Table J-2.1 below sets out responses to the statutory consultation from consultees under s42(1)(b) of PA 2008 concerning offshore elements of the Proposed Development and the regard had to them by the Applicant. It should be read in conjunction with Section 7.2 of the Consultation Report (Document Ref: 5.1).

Table J.2.1 - Offshore: Summary of Section 42(1)(b) responses and regard had by topic

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Assessment methodology				
Methodology	The Council supports the principle of the delivery of low carbon technologies and draws attention to its adoption of a Climate Emergency Development Plan Document.	Cornwall Council	This is noted.	N
Methodology	The Council draws attention to its Maritime Strategy 2012-2030 and the Coastal Concordat.	Cornwall Council	The Offshore Cable Corridor does not cross the Cornwall Maritime Strategy Area, which focuses on the Cornish coastal zone and inshore waters (<12 nautical miles offshore). Cornwall sits within the South West England inshore plan area which is in turn enveloped by the South West offshore plan area. Tables are provided in each of the offshore Environmental Statement chapters (Volume 3 of the ES) that set out a summary of the specific policies of relevance from the South West Inshore and South West Offshore Marine Plans (MMO, 2021).	N

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Methodology</p>	<p>The Council is keen to ensure that all relevant aspects of the marine environment are appropriately considered and assessed as part of the EIA process supporting this transboundary project. Inter alia, the Council is keen to ensure that all likely significant environmental effects (both positive and negative) on fishing, ecology, tourism and other sea based recreational interests are appropriately considered in the Environmental Statement.</p>	<p>Cornwall Council</p>	<p>The Applicant confirms that all relevant aspects of the marine environment have been appropriately considered through the EIA process including Scoping, Preliminary Environmental Impact Review (PEIR) and the Environmental Statement.</p> <p>Comments from relevant marine stakeholders, including from relevant meetings have been incorporated through the EIA process as detailed in both the relevant chapters below and in the Consultation Report (Document Ref: 5.1).</p> <p>Potential impacts on fishing are considered in Volume 3, Chapter 3: Commercial Fisheries of the ES (Document Ref: 6.3.3)</p> <p>Potential impacts to ecology are considered in the following chapters:</p> <ul style="list-style-type: none"> • Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1) • Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES (Document Ref: 6.3.2) • Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document Ref: 6.3.4) • Volume 3, Chapter 9: Offshore Ornithology of the ES (Document Ref: 6.3.9) • Potential impacts to tourism are considered in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) <p>Potential impacts to other sea based recreational interests are considered in Volume 3, Chapter 6: Other Marine Users of the ES (Document Ref: 6.3.6).</p>	<p>N</p>

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Design				
Cable security	The Council questions the ability for the cables to be secure and safe from sabotage and damage.	Torridge District Council	<p>The proposed cable protection methods are described in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p> <p>Safety and security standards, similar to those implemented on cable projects operated by others such as National Grid, will be applied. Rigorous and robust security and safety reviews have been undertaken on the project, which are informing the design process.</p> <p>Based on the initial assessment of the geotechnical and geophysical survey data, the cables will be buried along the entire route.</p> <p>For 220km of the 371km route in UK waters it is anticipated that the cables will be protected by trenching and covered by natural sediments. It is anticipated that additional protection would be required along approximately 150 km of the route in UK waters.</p> <p>An Outline Cable Burial Risk Assessment is provided as Appendix 3.4 to Volume 1 of the ES (Document Ref: 6.1.3.4).</p> <p>Where the cable cannot be buried at cable crossings or on account of the seabed characteristics, cable protection in the form of a rock berm or concrete mattresses would be required.</p>	N
Ecology				
Benthic ecology	Digging cables into the seabed is going to cause harm and disruption to the marine environment. Thorough investigation is needed of the effect on life on seabed including an assessment of impacts of noise arising from construction.	Torridge District Council	<p>Potential impacts to the marine environment have been assessed in Volume 3, Chapters 1-9 of the ES (Document Ref: 6.3.1-9), including noise impacts arising from construction of the Proposed Development.</p> <p>Potential impacts to ecology are considered in the following chapters:</p> <ul style="list-style-type: none"> Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1) 	N

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
			<ul style="list-style-type: none"> • Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES (Document Ref: 6.3.2) • Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document Ref: 6.3.4) • Volume 3, Chapter 9: Offshore Ornithology of the ES (Document Ref: 6.3.9) <p>In addition, reference should be made to Volume 3, Appendix 4.1: Underwater Noise Technical Assessment of the ES (Document Ref: 6.3.4.1).</p> <p>The assessment considers the worst-case scenario for the most sensitive functional hearing groups (FHG) among marine mammals and fish.</p> <p>It is considered unlikely that any injury to fish will occur as result of construction noise, as even injury would only occur in cases where the fish is within the predicted impact range of noise for a number of hours. Fish will be able to move away and avoid the source of the noise as required.</p> <p>Recoverable, 'Temporary Threshold Shift' injuries are a possibility for grey and harbour seals if they are within 160m of the 'loudest' noise source when the proposed activity commences. For other receptor groups, impacts are considered highly unlikely.</p> <p>All receptors are considered to be at low risk of any adverse behavioural responses during the proposed noise emitting activities.</p>	

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Socioeconomics				
Skills & employment	<p>Table 3.49 – Offshore O&M</p> <p>Why is no spend proposed or considered for the Local Area here despite maritime and offshore strengths, especially aligning with FLOW skills and workforce requirements (including vessels where looking at cables)</p>	Torrige District Council	<p>As outlined in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) the assessment is based on conservative estimates of local spend, in line with the worst case scenario approach in an EIA.</p> <p>An Outline Skills and Employment Strategy has been provided with the DCO application (Document Ref. 7.23). Skills and Employment Plans will be developed in accordance with the Outline Skills and Employment Strategy prior to and during the construction phase, setting how the Applicant and it's Contractors will engage with the local community to provide opportunities for skills development and employment, particularly during the construction phase of the project.</p> <p>For the purposes of the socio-economic assessment however, a conservative assumption of local content has been maintained.</p>	N

Table J-2.2 below sets out responses to the statutory consultation from consultees under s42(1)(b) of PA 2008 concerning onshore elements of the Proposed Development and the regard had to them by the Applicant. It should be read in conjunction with Section 7.2 of the Consultation Report (Document Ref: 5.1).

Table J.2.2 - Onshore: Summary of Section 42(1)(b) responses and regard had by topic

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Air quality				
Dust	Volume 2 Chapter 7 discusses the potential air quality impact, with particular relevance to dust emissions on neighbouring amenity from an environmental protection perspective. The proposed development will be carried out over a significant time period and has the potential to impact a considerable number of residential properties. Table 7.21 indicates that a Dust Management Plan (DMP) will be devised to support the CEMP once finalised. The Environmental Protection Team would expect a DMP to be robust and outline suitable measures to mitigate dust during construction. Reference to the IAQM guidance is highly recommended.	Torridge District Council	<p>Air quality impacts resulting from increases in dust are assessed within Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7), in Sections 7.10 to 7.12.</p> <p>An Outline Dust Management Plan (DMP) has been included with the Outline Onshore Construction Environmental Management Plan (On-CEMP) (Document ref: 7.7). A draft copy of the Outline DMP was provided to the Local Planning Authorities (LPAs) for comment on 3 October 2024. The Outline DMP will be updated to address any comments from the LPAs as part of a future examination deadline submission (deadline to be confirmed with PINS).</p> <p>The DMP will be in general accordance with the Outline DMP and will be submitted to Torridge District Council (TDC) for approval prior to construction. Preliminary Works will be carried out under the Outline DMP that forms part of the application for development consent.</p> <p>The Outline DMP comprises suitable measures based upon the Institute of Air Quality Management dust guidance (IAQM, 2024).</p>	N

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Alternatives and need				
Climate obligations	Section 4.2 (Need for the Proposed Development) sets out the need for the development and refers to National Policy Statements, the UK's legal climate change commitments, and various policy papers. The PEIR should also reflect on how the project would meet TDC's obligations regarding climate change and should refer to policies in the adopted Local Plan.	Torridge District Council	<p>The Applicant submits it has considered TDC's obligations within the reasonably practicable commitments of the Proposed Development.</p> <p>The need case for the development is set out in the Planning Statement (Document Ref:7.2). Section 5.5 makes reference to Torridge District Council's 2019 declaration of a Climate Emergency, and signature of the Devon Climate Declaration.</p> <p>Torridge District Council's policies and obligations are also referred to in Volume 4, Chapter 1: Climate Change of the ES (Document Ref: 6.4.1). Table 1.4 summarises local planning policies relevant to the issue of climate change, including from the North Devon and Torridge Local Plan 2011-2031 (Torridge District Council, 2018) and the Climate Adaptation Strategy for Devon, Cornwall, and Isles of Scilly 2023-27 (Devon, Cornwall and Isles of Scilly (DCIoS) Climate Impacts Group, 2023).</p> <p>Local climate obligations are also considered in the Planning Statement (Document Ref: 7.2), Section 4.5.</p> <p>The Applicant additionally wishes to highlight the response of Devon County Council to the consultation:</p> <p style="text-align: center;"><i>“After reviewing Volume 4, Chapter 1 of the PEIR. We are satisfied with the methodology used to assess the impact of the greenhouse gas emissions arising from the construction, operation and decommissioning phases alongside the cumulative effects with the avoidance of emissions from non-renewable power generation. It is extremely likely that this development will result in a significant beneficial impact on the global climate system, which should be maximised by ensuring the developer implements their proposed mitigation options.”</i></p>	N

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<p>Site selection</p>	<p>Paragraph 4.462- 4.490 identifies the approach towards designing the project including site selection, landscaping measures, and how X-Links have responded to concerns raised by statutory consultees. The PEIR is silent on the views previously provided by the Local Authority on the matter of site selection, and instead relies more greatly on the engineering rationale, as well as views from a selected number of residents and connection to the Grid. For clarity, the Local Authority previously raised concern with the site currently chosen, as the Huntshaw site would be more sheltered from surrounding viewpoints. Notwithstanding this, the Councils Landscape 'expert' has been involved in the detailed design of the scheme which has included discussion on viewpoints and landscaping measures. In the opinion of the Local Authority, a detailed proposal is required in order to respond appropriately to the surrounding landscape and site context. Whilst this part of the PEIR makes effort to demonstrate steps taken in the design stage of the project, the Rochdale method now used is a retrograde step which inhibits the ability for the Local Authority and its consultees to robustly assess the proposals in relation to design, landscape and heritage impacts.</p>	<p>Torrige District Council</p>	<p>The Applicant notes the concern from Torrige District Council. The Applicant considers however, that these concerns would be alleviated in the three parts as follows:</p> <p>Firstly, the Applicant submits that an appropriate level of detail on design development to date is now included in the Design Approach Document (Document Ref: 7.3).</p> <p>Secondly, the Applicant is proposing that the final detailed design will be developed in consultation with Torrige District Council and the design principles set out in the Design Principles Statement (Document Ref: 7.4)</p> <p>Thirdly, the Applicant has therefore offered a Requirement within the draft Development Consent Order (dDCO) (Document Ref: 3.1) for the final design of the Converter Site to be agreed by Torrige District Council, in consultation with Devon County Council, Historic England and the Environment Agency.</p> <p>In order to provide further information for due consideration, the Applicant has prepared the following additional response:</p> <p>The approach to site selection is considered Volume 1, Chapter 4: Need and Alternatives of the ES (Document Ref: 6.1.4) and in the Planning Statement (Document Ref: 7.2). This includes pertinent points as follows;</p> <p>The Applicant notes that Torrige District Council raised a landscape-based concern with the location of the Old Webbery Showground site (proposed Converter Site) during pre-application advice, when the Applicant was considering a Town and Country Planning Act (1990) application.</p> <p>The Applicant undertook non-statutory consultation in November 2022 on a proposed alternative site in Huntshaw. The Applicant received considerable adverse community feedback on the proposed Huntshaw site, particularly in regard to heritage, access and landscape concerns.</p>	<p>N</p>
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		<p>Following further engagement with Original Equipment Manufacturer (OEM) suppliers following the non-statutory consultation, the Applicant identified the need for a larger Converter Site to meet their requirements for the Converter Halls. This meant, in addition to the community opposition to the Huntshaw site, it was too small for the proposed Converter Site and associated infrastructure and appropriate landscape bunding could not be implemented at the site to mitigate landscape and visual impacts.</p> <p>The Applicant notes that although the Old Webbery Showground site sits closer to the ridge line, the site allows for appropriate earthworks to 'sink' the Converter Hall into the ridge line and has adequate space for appropriate landscape bunding to mitigate potential landscape and visual impacts associated with the buildings and infrastructure.</p> <p>The Applicant notes that the Council's landscape expert has been fully engaged with the development of the Old Webbery Showground, including landscape bunding design and has provided feedback on landscaping that has been incorporated into the design assessed in the Environmental Assessment.</p> <p>The Applicant further notes the Council's concern on the use of the Rochdale Envelope/Project Design Envelope (PDE) approach, which is a common standard recognised in the Overarching National Policy Statement (NPS) for Energy (NPS EN-1) (DESNZ, 2023a), the NPS for Renewable Energy Infrastructure (NPS EN-3) (DESNZ, 2023b) and the NPS for Electricity Networks Infrastructure (NPS EN-5) (DESNZ, 2023c). The policies are discussed in the Planning Statement (Document Ref: 7.2). and includes pertinent points as follows:</p> <p>The adoption of the Rochdale Envelope approach allowed for a worst case and therefore conservative EIA to take place by defining a 'maximum design scenario' on which to base the identification of likely environmental effects. The maximum design</p>	
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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
			<p>scenario is the scenario that would give rise to the greatest impact (and subsequent effect). By identifying the maximum design scenario for any given impact, it can be concluded that the impact (and therefore the resulting effect) would be no greater for any other design scenario.</p> <p>Furthermore, this approach utilises a 'parameter based approach' in order to provide a proportionate degree of flexibility to accommodate any changes before the final alignment and design of the Proposed Development. The Draft Order Limits define the maximum extent within which the development works can be carried out, allowing for a realistic worst-case assessment.</p> <p>Finally, the Applicant submits that in comparison with the PEIR, a more detailed Landscape, Seascape and Visual Resources Assessment has been carried out. A greater number of verified views have been submitted, including a number from the west of the site of the Converter Station. See Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2), along with associated appendices and figures.</p> <p>In conclusion, the Applicant submits it has fully considered and addressed the Council's commitments in respect of the design developed to date, and has offered future involvement of the Council to maintain the positive and collaborative engagement to date as the design matures through future phases of the project.</p>	

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Climate				
GHG emissions	<p>After reviewing Volume 4, Chapter 1 of the PEIR. We are satisfied with the methodology used to assess the impact of the greenhouse gas emissions arising from the construction, operation and decommissioning phases alongside the cumulative effects with the avoidance of emissions from non-renewable power generation. It is extremely likely that this development will result in a significant beneficial impact on the global climate system, which should be maximised by ensuring the developer implements their proposed mitigation options.</p> <p>Devon County Council is also content that an appropriate methodology has been followed to assess the impact of climate change on the resilience of the development.</p>	Devon County Council	This is noted.	N
Referencing	<p>Vol 4 Chapter 2 Climate Change Risk Assessment:</p> <p>In general would be good if this Chapter could refer to the Devon, Cornwall and Isles of Scilly Adaptation Strategy, and in particular their risk register</p>	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>Volume 4, Appendix 1.2: Climate Change Risk Assessment Technical Report (Document Ref: 6.4.1.2) includes relevant local policy and guidance, which refers to the Devon, Cornwall and Isles of Scilly Adaptation Strategy (Devon, Cornwall and Isles of Scilly (DCIoS) Climate Impacts Group, 2023).</p> <p>In preparation of the climate change risk assessment, the risk register detailed within the Devon, Cornwall and Isles of Scilly Adaptation Strategy (Devon, Cornwall and Isles of Scilly (DCIoS) Climate Impacts Group, 2023) has been reviewed and considered.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Assessment methodology	Para 1.5.2 Query as to why UKCP Regional12km projections weren't used for the onshore climate projections, given these are recommended when local scales are essential – they better represent local effects due to land elevation, coastlines and surface characteristics. Would also suggest UK CP Local (2.2km) projections should be included for the convertor site.	Torridge District Council	<p>Risk assessments often use measures of probability and consequence to characterise the risk. The UK Climate Projections (UKCP) P18 guidance (Met Office, 2018) also highlights that the probabilistic projections should be used to help characterise future climate extremes in a risk assessment. The Applicant notes that probabilistic projections are only available at the 25km scale and as such have been used in the assessment.</p> <p>The Applicant submits that probabilistic projections published at a 25 km grid cell scale provide the most useful methodology for the climate change risk assessment.</p> <p>When considering the onshore elements, being designed to show a range of projection values that reflect uncertainty in modelled outcomes, requires a probabilistic projection.</p> <p>Further details on the climate change risk assessment methodology are provided within Volume 4, Appendix 1.2: Climate Change Risk Assessment of the ES (Document Ref:6.4.1.2).</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Wildfire risk	Table 1.5 Wildfire doesn't appear to have been considered as a climate risk. Given the increasing number of incidents we are seeing in northern Devon, I think it should be included for convertor construction and operation. Note that convertors have a fire risk which will presumably be covered somewhere in the planning application (albeit not in the PEIR?) Could be 'interesting' fighting a large convertor fire given their location...	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>The climate change risk assessment (Environmental Statement, Volume 4, Appendix 1.2 – Document Ref: 6.4.1.2) considers the potential risk of impacts associated with increasing frequency and intensity of extreme weather events, including storms and flooding and conversely drought, heat stress and wildfires.</p> <p>In order to minimise such risks, construction activities would be undertaken in line with the On-CEMP (including in outline at Document Ref: 7.7), relevant health and safety guidance and in compliance with requirements of the local fire authority. The design of the converter station will comply with all relevant statutory requirements including building regulations, building control requirements and fire safety in consultation with the fire authority.</p> <p>Further details are provided in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p>	N
Community benefit				
Community benefits package	<p>The Council recognises there is a difference between those impacts which will require mitigation to be secured through the DCO process and other opportunities which can also benefit the community that sit outside the DCO process but can be encompassed within a community benefits package.</p> <p>The Council would very much welcome the implementation of a Community Benefits Package related to XLinks.</p>	Devon County Council	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Applicant met with Torrige District Council and Devon County Council on 4 October 2024 to present its initial approach to a Community Benefit Fund.</p> <p>The approach was well received by the councils and the Applicant is seeking to continue to work with the councils and engage with local stakeholders to build understanding of the local context and to develop the fund in a way that has a genuine and lasting benefit for the community.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Community benefits package</p>	<p>Whilst the Council acknowledge that the process of determining an appropriate package of benefits and the governance of those benefits will involve ongoing discussions between key parties, we would wish to work with the developer to help ensure a strong strategically focused and locally administered programme of activity which meets the six priorities of the Devon Strategic Plan 2021 -2025, as set out below, whilst also having regard to other county council strategies such as the Barnstaple with Bideford and Northam LCWIP (February 2023) and relevant Torridge and North Devon District corporate strategies:</p> <ol style="list-style-type: none"> 1. Respond to the climate emergency 2. Be ambitious for Children and young people 3. Support sustainable economic recovery 4. Tackle poverty and inequality 5. Improve health and wellbeing 6. Help communities be safe and resilient 	<p>Devon County Council</p>	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Applicant acknowledges the priorities set out in the Devon Strategic Plan (Devon County Council, 2021) and other local policy documents and will seek to reflect these priorities as we develop the community benefits package in collaboration with local stakeholder groups.</p>	<p>N</p>
<p>Community benefits package</p>	<p>It should also be noted that we are working alongside and in partnership with both Torridge and North Devon District Councils to ensure that the full economic potential from XLinks and other offshore renewable energy projects are realised and yield a long-lasting beneficial legacy. Torridge and North Devon are areas which have for many years suffered from poor economic performance, but which have very significant economic potential.</p>	<p>Devon County Council</p>	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Applicant met with Torridge District Council and Devon County Council on 4 October 2024 to present its initial approach to a Community Benefit Fund.</p> <p>The approach was well received by the councils and the Applicant is seeking to continue to work with the councils and engage with local stakeholders to build understanding of the local context and to develop the fund in a way that has a genuine and lasting benefit for the community.</p> <p>Some benefits will be provided directly through the DCO and the delivery of the Proposed Development and some will be outside of the DCO pursuant of the Community Benefits Package.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Community benefits package</p>	<p>The Council are keen to ensure that any Community Benefits Package is used to help mitigate any direct negative effects in impacted communities, over-and-above any compensation, or habitat restoration that might be required and we very strongly wish to ensure that a focused strategic approach to longer term benefits is achieved, potentially through also leveraging in additional support and resources beyond the Community Benefits Package itself. This could for example include investment in:</p> <ul style="list-style-type: none"> • Skills, training, careers support and engagement with younger people and local primary and secondary education providers; • Supply chain development and business growth; • Infrastructure investment in the local area that helps to yield benefits from further renewable energy opportunities. Examples could include supporting nascent hydrogen production infrastructure, or port adaptation; and • Locally strategic transport initiatives, active travel schemes and existing transport infrastructure to improve connectivity and off-road links. 	<p>Devon County Council</p>	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Applicant is seeking to develop a Community Benefit Fund that will deliver legacy benefits to the community. As part of this we will seek opportunities to promote capacity building within local organisations, encourage projects with long term benefits and explore match funding opportunities.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Community benefits package</p>	<p>We would also wish to see the vast majority of spend and especially benefits to take place within the Torridge and North Devon area, but realise the significant wider opportunities that may exist in terms of partnership further afield, such as partnerships with Universities, or potential co-investment with the UK Government, Devon County Council, Devon and Torbay Combined County Authority and with businesses, provided that the majority of benefits impact the area most affected by Xlinks (Torridge and North Devon).</p>	<p>Devon County Council</p>	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Applicant met with Torridge District Council and Devon County Council on 4 October 2024 to present its initial approach to a Community Benefit Fund.</p> <p>The approach was well received by the councils and the Applicant is seeking to continue to work with the councils and engage with local stakeholders to build understanding of the local context and to develop the fund in a way that has a genuine and lasting benefit for the community.</p> <p>Some benefits will be provided directly through the DCO and the delivery of the Proposed Development and some will be outside of the DCO pursuant of the Community Benefits Package.</p> <p>The Applicant has met with both Devon County Council and Torridge District Council to discuss community benefit and notes Council's preference in relation to the location of investment associated with the Community Benefit Fund.</p> <p>The Applicant is exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, which may include the tender of work packages during the construction of the project and through the establishment of a community benefit fund.</p>	<p>N</p>

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<p>Community benefits package</p>	<p>There will be mitigation identified through the EIA process to address the impacts identified against the various technical areas. For example, the socio-economic impacts arising from the development must be identified, evaluated and mitigated via the EIA process. Such impacts, as identified above, will likely include reduced access to and availability of temporary housing, reduced availability of construction workers and materials, reduced incomes and business for local tourism / visitor attractions etc. The Council believes that the approach to mitigation of these impacts should be considered in a holistic manner with a view to the potential for legacy benefits. The Council understands the difference between mitigation that is required to address impacts, and therefore relevant to be secured via the DCO process, and community benefits that sit outside of this process. However, it is important that any mitigation measures required to address temporary impacts, e.g. accommodation for construction workers, are assessed in terms of the potential for them to remain in the longer term as a community benefit, e.g. to address the challenge of insufficient temporary accommodation across District. This principle can extend to highway mitigation, for example, temporary road diversions / new routes may be best retained as permanent routes to provide an overall betterment to the highway.</p>	<p>Torrige District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>As discussed in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3), the construction phase of the Proposed Development is expected to have a negligible beneficial impact on the local economy.</p> <p>However, a minor adverse impact on the tourism economy, primarily arising as a result of potential displacement of tourists from local accommodation providers, is also noted. This effect is not considered to be significant in EIA terms.</p> <p>The Outline Accommodation Strategy (Document Ref: 7.13) indicates that the majority of the out of area construction workforce can be accommodated through other means than tourist accommodation and that, if required, the use of tourist accommodation would account for between 0.5-1.0% of available supply within Torrige and North Devon.</p> <p>As such, the tourism related impacts assessed in the Environmental Assessment are substantially reduced since the PEIR assessment. For instance, rather than the figure of £2.8 million for displaced spend as referenced in the PEIR, a revised, equivalent figure of £0.7 million – 75% lower – is outlined and discussed in Section 3.10 of Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p> <p>The Applicant agrees that certain measures introduced as mitigation will have the potential to remain and provide long-term benefits to the community after the completion of the Proposed Development.</p> <p>For instance, as detailed in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5), Section 5.9, a small number of permanent road upgrades are proposed to the local highways network, enhancing local road safety.</p> <p>The permanent realignment and widening of junction of the A386 and the unnamed road leading to Littleham to facilitate AIL and</p>	<p>N</p>
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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
			<p>HGV movements into the temporary construction compound will provide a lasting highway improvement at this location, which the Applicant notes is of great concern to both prescribed and public consultees.</p>	
<p>Community benefits package</p>	<p>As a 'host authority', the Council is best placed to play a key role in any negotiations and discussions around community benefit. Initial thoughts expressed by Members direct towards a mix of legacy and community-fund type benefits that seek to align with and support delivery of the Council's corporate strategies, most notably the Strategic Plan 2024-29, North Devon and Torridge Economic Strategy 2024-2029, North Devon and Torridge Clean Maritime Growth Vision, (emerging) Torridge Housing Strategy, Northern Devon Culture Strategy and the Torridge Carbon, Environment and Biodiversity Plan. Devon County Council strategies and plans will also be relevant, including the Barnstaple with Bideford and Northam Local Cycling and Walking Infrastructure Plan. It will be important for any community benefit approach to be strategic and have a legacy.</p>	<p>Torridge District Council</p>	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Applicant presented an initial plan for the Community Benefit Fund to Torridge District Council and Devon County Council on 4 October 2024. It was confirmed that the fund would be developed to harmonise and support where possible local authority strategic plans and economic strategy. It is intended that the fund be administered by an independent grant administrator with representation of local voice through community and stakeholder engagement in the development and operation of the fund. One of the principles of the fund will be to leave a legacy, and so the fund will look to invite applications that can demonstrate lasting benefit.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Community benefits package</p>	<p>The Council has prepared a Place Story to support consideration of its Levelling-Up Partnership status. The Place Story highlights key socio-economic indicators and explores opportunities for growth and increasing prosperity. Any community benefit package should be informed by the Place Story.</p>	<p>Torrige District Council</p>	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Applicant met with Torrige District Council and Devon County Council on 4 October 2024 to present its initial approach to a Community Benefit Fund.</p> <p>The approach was well received by the councils and the Applicant is seeking to continue to work with the councils and engage with local stakeholders to build understanding of the local context and to develop the fund in a way that has a genuine and lasting benefit for the community.</p> <p>Some benefits will be provided directly through the DCO and the delivery of the Proposed Development and some will be outside of the DCO pursuant of the Community Benefits Package.</p> <p>The Applicant notes the development of the Place Story (Torrige District Council, 2024) and Council’s request for the incorporation of the Place Story in the development of the Community Benefit Fund.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Community benefits package</p>	<p>The approach to community benefit needs to be progressed through discussions between key parties to explore what is potentially being offered and how this can best be secured and governed. There are parts of the District that will be affected to a greater extent than others, e.g. those Wards affected by construction, some of which are amongst the poorest. A fair, equitable approach should be taken however the nature of any package should be such that wider socio-economic benefit is realised. It is noted that XLinks is already in discussion with Petroc to explore skills and education benefits, which is welcomed, however it is important that a joined-up approach is taken to enable the widest benefit to be achieved.</p>	<p>Torrige District Council</p>	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Applicant met with Torrige District Council and Devon County Council on 4 October 2024 to present its initial approach to a Community Benefit Fund and will continue to work with the councils to develop the fund in a way that has a genuine and meaningful benefit for the community.</p> <p>The Applicant is exploring how it can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, which may include the tender of work packages during the construction of the project and through the establishment of a community benefit fund.</p> <p>The Applicant continues to engage with Torrige District Council and Devon County Council, as well as other key local stakeholders, to develop a community benefit package that responds the local need and will share more information during examination. The Applicant will engage with the community as its plans mature to make sure that community voice has a role in refining its package to meet local needs. The Applicant will seek to create a lasting benefit for the community and will develop its plans to leverage where possible the good existing community work which is already underway.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Community benefits package</p>	<p>The Council is seeking external advice to inform its position on community benefits and requests that dedicated meetings taken place alongside the technical matters being discussed through the Pre-Application Stage. Any community benefit package should be fair, proportionate, strategic in aligning with wider Council strategies, and involve a combination of legacy / transformative benefits and community funds.</p>	<p>Torrige District Council</p>	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Applicant met with Torrige District Council and Devon County Council on 4 October 2024 to present its initial approach to a Community Benefit Fund and will continue to work with the councils to develop the fund in a way that has a genuine and meaningful benefit for the community.</p> <p>The Applicant is exploring how it can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, which may include the tender of work packages during the construction of the project and through the establishment of a community benefit fund.</p> <p>The Applicant continues to engage with Torrige District Council and Devon County Council, as well as other key local stakeholders, to develop a community benefit package that responds the local need and will share more information during examination. The Applicant will engage with the community as its plans mature to make sure that community voice has a role in refining its package to meet local needs. The Applicant will seek to create a lasting benefit for the community and will develop its plans to leverage where possible the good existing community work which is already underway.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Construction				
Programme	<p>The supporting documentation identifies a development lag between Bipole 1 and Bipole 2 of approximately two-three years. Such a development lag requires justification as it needs to be demonstrated why all the cabling (particularly the areas within/or in sight from the AONB/National Landscape) cannot be implemented concurrently. In addition, further detail is required about how the 'land' (referenced in 3.69) will be left and maintained within the intervening period.</p>	<p>Torrige District Council</p>	<p>The project programme is detailed in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p> <p>The construction strategy for the cable connection from coast to the converter stations in Devon is for the groundworks and civil engineering to be completed in a single stage followed by pulling-through of cables, which will occur in two stages, to facilitate the connection and commissioning of Bipole 1 and then Bipole 2.</p> <p>Once the Converter Site has been established, the converter station infrastructure serving Bipole 1 would be commenced first reflecting the earlier connection date followed by Bipole 2 at a suitable stagger in the programme. This means that both converter stations would be built in overlapping periods, leading to their sequential commissioning.</p> <p>The construction work would be completed in a single phase and there would be no periods in the programme when construction work at the Converter Site ceases until both bipoles are commissioned.</p> <p>The Outline On-CEMP (Document Ref: 7.7) includes details of how the visual appearance of construction compounds would be maintained to minimise visual impacts during periods of inactivity within the HVDC onshore cable corridor.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Programme	Paragraph 3.7.95 provides a 'broad sequence' of events in the lead-up to cable construction. Sub-section (9) refers to the maintenance covers for access to 'joint bays' and 'link boxes' – but provides limited information as to the appearance of joint bays. Given the sensitivity to rural locations throughout the district, these should be recessed as much as possible to limit the adverse impact to surrounding character.	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>Details regarding the joint bays and link boxes are provided in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3), within paragraphs 3.7.127 to 3.7.133. These structures would be situated below ground.</p> <p>The land above the joint bays would be fully reinstated, and would not include maintenance covers and thus, would not be visible during operation and maintenance.</p> <p>Link boxes will be installed up to ground level and would include a ground level maintenance cover to allow for access during operation and maintenance. The link boxes will be located as close to existing hedgerow field boundaries to minimise impacts on arable farming as much as practicable, with appropriate fencing installed to protect both the link box covers and farm equipment from collision during farming operations.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Visual impact	Paragraph 3.7.100 details what might be included within a construction compound. There are a number of construction compounds plotted throughout the cable route. The vast majority of compounds will be in the Countryside and thus be prominent by their very nature. Therefore, care should be taken to limit the intrusion caused, particularly at landfall, as it would be visible from the Coast Path.	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>Where reasonably practicable, measures would be taken to contain and limit the visual intrusion of the onshore construction sites, including the temporary compounds.</p> <p>The majority of the temporary compounds along the HVDC onshore cable corridor are associated with temporary trenchless methods for crossing sensitive features in the landscape. These temporary compounds would only be used for the period of drilling works, which, with the exception of the A39 crossing and River Torridge crossing, are expected to be in place for a short duration (a small number of weeks).</p> <p>Where possible, the location and layout of the compounds (e.g. siting of welfare facilities) would be designed to avoid overlooking residential properties. Further details and measures to minimise visual impacts are provided in the Outline On-CEMP (Document Ref: 7.7).</p> <p>The visual impacts themselves are considered Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2). The visual impact of the construction compounds is considered in Section 2.10. The visual impact of the compounds is generally considered to be of small geographical extent, direct, short-term and temporary.</p> <p>Compounds in sensitive locations such as areas close to the coast, notably the Landfall HDD compound and the similar compounds either side of the River Torridge would include erection of temporary hoarding or screening to minimise both visual and noise disturbance effects.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Programme	Duration of construction ...what is the definition / quantification of 'short term'	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>An indicative construction programme is contained in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3). 'Short term' is defined as 'a period of months, up to one year', as set out in Volume 1 Chapter 5: Methodology of the ES (Document Ref: 6.1.5).</p> <p>Construction is currently expected to last 72 months, with an indicative full commissioning of the Proposed Development expected in 2033.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Cable route				
Pylons	The Council is concerned over the potential impact of any overground Pylon route and would suggest cables should be buried in sensitive areas.	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>Significant mitigations are proposed as part of the Proposed Development, including by burying cables completely for the entire length of the route.</p> <p>The Onshore HVDC Cables and HVAC Cables would be completely buried underground for the entire length. Joint bays would be completely buried, with the land above reinstated. A maintenance cover would be provided on the surface for link boxes for access during the operation and maintenance phase. This is described in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p> <p>No new OHLs would be required for the Proposed Development. The Applicant notes that National Grid is responsible for designing and constructing a new substation at the Alverdiscott Substation Site under a separate planning application (under the Town and Country Planning Act (1990)) to facilitate the new connection for the Proposed Development. National Grid has advised that a new tower may be required within, or immediately adjacent to the existing Alverdiscott Substation Site, but these are to connect the existing OHL to the new substation and no new OHLs are required for their development associated with the Proposed Development.</p> <p>The existing utilities that would require diversion or undergrounding are presented within Volume 1, Figure 3.5: Utilities Diversion Plan, of the ES.</p>	N

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Converter station design				
Design code	<p>In addition, the PEIR notes the use of a 'design code'. The use of design coding has not been discussed with the Council ahead of the PEIR – and so remains a surprise admission. Notwithstanding this, the Council would strongly suggest that a design code would be of limited benefit, where the emphasis should be providing a detailed and finalised scheme which produces the least amount of landscape/character impact possible.</p>	<p>Torrige District Council</p>	<p>This is noted and has been addressed in the DCO Application.</p> <p>Consultation and approval of the detailed landscaping and visual mitigated design of the Converter Site, including landscape will be a Requirement of the draft DCO (Document Ref: 3.1) as informed by the Design Principles Statement (Document Ref: 7.4), which includes a continuation of the engagement to date with key stakeholders including the Council.</p> <p>The use of design code (now Design Principles) has been discussed with both Torrige District Council and Devon County Council in regular planning officer and landscape specific meetings before and following the submission of the application.</p> <p>The Applicant has proposed a parameter-based approach which will be further informed during detailed design by the appointed Construction contractors.</p> <p>The Design Principles Statement (Document Ref: 7.4) provide a set of principles with which the construction contractors must comply in the development of the detailed design and provide Torrige District Council (as the detailed design approval authority for the Converter Site) a set of principles to assess the proposed detailed design.</p> <p>The Design Principles will ensure the Converter Station adopts an architectural and landscaping design that is sympathetic to the surrounding area and uses appropriate materials, colours and finishes.</p> <p>The Applicant will continue to engage with Council during the preparation of the detailed design and will include engagement with external stakeholders such as Historic England, Natural England and the Environment Agency.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Cumulative impacts				
Cumulative impacts	We acknowledge that the cumulative impacts of the projects and plans relating to the White Cross Offshore Wind Farm (onshore project) and The Crown Estate Round 5 Celtic Sea project development areas have been set out within Volume 1, Appendix 5.3: Cumulative Effects Assessment Screening Matrix of the submitted PEIR.	Devon County Council	This is noted and has been addressed in the ES. The cumulative impacts of the Proposed Development and other developments coming forward in the North Devon region are considered in the Environmental Statement. In particular, please refer to Volume 1, Appendix 5.3: Cumulative Effects Assessment Screening Matrix of the ES (Document Ref: 6.1.5.3).	N
Ecology				
Biodiversity net gain	<p>The cabling work will inevitably lead to the loss of a considerable amount of hedgerows and other areas of biodiversity. While it is noted that XLinks is proposing to deliver net gain in terms of biodiversity, this isn't going to happen instantly. Any net gain provision should be delivered at the earliest possible stage in the development.</p> <p>Thorough and robust ecological surveying is needed to properly understand impacts and to enable mitigation. The Council has appointed an external ecologist who will be available for upcoming ecology focused pre-application meetings.</p>	Torridge District Council	<p>The Proposed Development is not subject to a mandatory net gain requirement under the Environment Act 2021. Nevertheless, the Applicant has engaged with statutory consultees to discuss the approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit.</p> <p>Discussions have taken place with Natural England regarding BNG as well as with North Devon Biosphere team to look into off-site enhancement.</p> <p>The Applicant's approach to biodiversity enhancement is set out in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), section 1.8. This includes habitat creation at the Converter Site, including features which increase connectivity with habitat features beyond the site. This also provides mitigation habitat for protected species such as dormice, bats and birds.</p> <p>This approach is also present in habitat creation areas to be formed in blocks to either side of the Torridge Estuary and further hedgerow enhancements along the HVDC cable route.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Flood risk				
Flood risk	<p>The Lead Local Flood Authority has reviewed the submitted information for this PEIR. Whilst our statutory consultee role requires us to review the surface water drainage elements of the proposals, we have also provided comments on Land Drainage Consents (as this is another function of the Flood and Coastal Risk Management Team).</p> <p>It is noted and welcomed that the applicant has made an assessment of the construction, operational and decommissioning phases of the scheme and that the applicant has used 50% as the climate change value.</p>	Devon County Council	<p>This is noted and has been addressed in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3), and in the DCO Application.</p> <p>The Applicant provided the Lead Local Flood Authority with an update on surface water and drainage elements of the Proposed Development on 9 October 2024.</p> <p>The Applicant proposes a requirement for further development of the drainage design in accordance with the Design Principles Statement (Document Ref: 7.4), which would include further future engagement with the Council.</p>	N

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Drainage systems</p>	<p>At the Development Consent Order stage, the applicant will need to submit the detailed design of the proposed surface water drainage systems (unless this can be appropriately managed via a pre-commencement condition). The applicant should review Devon County Council's SuDS Guidance for details required, this guidance can be found here Sustainable Drainage System - Guidance for Devon (2023) - Flood Risk Management. Details will need to include at least the below:</p> <ul style="list-style-type: none"> • Plans with proposed surface levels, surface water drainage features, pipework, outfalls • Sections of proposed above-ground surface water drainage features • MicroDrainage model outputs (or similar). Outputs might need to include pipework • Confirmation of any landowner permissions required for the outfalls from surface water drainage systems (if outfalls are not within land owned by the applicant) • Maintenance details (who will be responsible and how they will maintain (what activities are required and on what frequency)) • Exceedance flow routes • Construction surface water management plan 	<p>Devon County Council</p>	<p>This is noted and has been addressed in the ES and the DCO Application.</p> <p>The impact of the Proposed Development in terms of hydrology and flood risk is considered in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).</p> <p>Further, a Flood Risk Assessment has been prepared, (see Volume 2, Appendix 3.1: Flood Risk Assessment of the ES (Document Ref: 6.2.3.1) which considers the flood risk associated the Onshore Infrastructure Area and demonstrates how flood risk will be managed, taking climate change into consideration.</p> <p>The Applicant provided the Lead Local Flood Authority with an update on surface water and drainage elements of the Proposed Development on 9 October 2024 and discussed the Applicant's approach to managing construction phase drainage through the Onshore CEMP (in accordance with drainage measures set out in the Outline Onshore CEMP (Document Ref: 7.7)) and managing operational drainage through an Operational Drainage Strategy, based on the Outline Operational Drainage Strategy provided with the DCO application (Document Ref: 7.22).</p> <p>The Council representatives did not provide any in-principle objection to this approach. The Outline Onshore CEMP (Document Ref: 7.7) includes measures consistent with Council's SUDs Guidance.</p> <p>With respect to the Council's request for a surface water management plan, the construction phase drainage measures will be approved by Torridge District Council (in consultation with Devon County Council) through the Onshore CEMP prior to commencement. This is secured by a Requirement in the draft DCO (Document Ref: 3.1).</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Drainage	The Applicant shall also assess whether the convertor stations (Bipole 1 and Bipole 2) and the access road and car park serving the convertor site will require drainage, and supporting details shall be submitted to support the findings of this assessment.	Devon County Council	<p>This is noted and has been addressed in the DCO Application.</p> <p>Drainage requirements for car park(s) and the access roads will be confirmed through detailed design for the Converter Site in consultation with the Council. The detailed design requires approval of Torridge District Council in consultation with Devon County Council, secured through a Requirement in the draft DCO (Document Ref: 3.1)</p> <p>The Outline Drainage Strategy (Document Ref: 7.22) sets out the principles for operational drainage at the Converter Site which will be confirmed through the development of an Operational Drainage Strategy, developed in accordance with the Outline Operational Drainage Strategy (Document Ref: 7.22).</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Drainage	The requirement for temporary drainage solutions such as filter drains for the haul roads and construction compounds shall be assessed and supporting details submitted as part of the supporting information for the Development Consent Order (DCO).	Devon County Council	<p>This is noted and has been addressed in the ES and the Application.</p> <p>The impact of the Proposed Development in terms of hydrology and flood risk, including during the construction stage, is considered in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).</p> <p>The landfall, Onshore HVDC Cable Corridor, Converter Site, Onshore HVAC Cables and associated temporary construction compounds and haul roads are assessed to have a low risk of flooding from fluvial and tidal sources until the end of the operational period.</p> <p>A full Construction Drainage Strategy would be developed post-consent and in accordance with the outline Construction Drainage Strategy detailed within the Outline On-CEMP (Document Ref: 7.7) which forms part of the application for development consent. The Construction Drainage Strategy will incorporate pollution prevention and flood response measures to ensure that the potential for any temporary effects on water quality or flood risk are reduced as far as practicable during the construction stage.</p> <p>The Outline Onshore CEMP (Document Ref: 7.7) sets out requirements to consider drainage requirements for the haul road and temporary construction compounds.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Drainage	The Applicant will need to provide details of the timing/ sequencing of events of the construction stage of the development in order to confirm when the permanent surface water drainage will be constructed. This will include details of when the temporary haul roads will be removed for example.		<p>This is noted and has been addressed in the ES.</p> <p>An indicative summary programme and sequencing of the works is included in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3), in Section 3.6.</p> <p>The permanent surface water drainage for the convertor stations will be constructed during the groundworks phase, as the final cut levels are achieved, and the hard landscaping (bunds) are created.</p> <p>The temporary haul roads will be removed as part of the restoration and reinstatement works. We propose to use the hauls roads to keep construction traffic off the roads so this is one of the final activities.</p>	N
Surface water flows	The Applicant will need to take care in areas of surface water flow paths or surface water drainage issues and ensure that flow paths are not altered for example by ruts created by plant/ machinery/ vehicles. The applicant will also need to demonstrate that ground is reinstated to previous condition. If haul roads are proposed across flow paths or in areas of poor drainage/boggy ground, then the applicant will need to design to the conditions for example by installing pipes beneath the haul road to keep flow paths open.	Devon County Council	<p>This is noted and addressed in the ES and DCO Application.</p> <p>The impact of the Proposed Development in terms of hydrology and flood risk is considered Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).</p> <p>The Outline On-CEMP (Document Ref: 7.7) contains measures regarding surface water management during construction. If required, additional drainage would be installed to ensure the existing flow pathways are maintained during and after construction.</p> <p>The Outline On-CEMP (Document Ref: 7.7) forms part of the DCO application, and Onshore CEMP(s) will be developed in accordance with the Outline On-CEMP.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Highway improvements	<p>Highway improvements, such as road widening and junctions works, are proposed. Surface water drainage should be assessed as part of this, including the potential for improvements.</p> <p>New roads are also proposed:</p> <ul style="list-style-type: none"> • Road to existing sewage works (west of East Langdon Farm) • New road at Gammaton Moor Cross • Surface water drainage should be constructed for new roads. 	Devon County Council	<p>This is noted and addressed in the ES.</p> <p>The impact of the Proposed Development in terms of hydrology and flood risk is considered Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).</p> <p>Flood risk for the highway improvements have been ascertained using the 2007 JFLOW Model, the 2012 Devon Hydrology Strategy and 2019 Weare Gifford Model.</p> <p>Improvements of existing junctions are located within Flood Zones 1, 2 and 3 and are not expected to result in any ground reprofiling. Activities involving the widening of existing roads are located within Flood Zone 1 and road widening is expected to tie into surrounding ground levels.</p> <p>The detailed design of the proposed highways works will consider drainage requirements, and the final highway design requires approval of Devon County Council as the relevant local highway authority.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Watercourse crossings</p>	<p>Looking at the Onshore Crossing Schedule (Volume 1; Appendix 3.4), there appears to be a number of potential Ordinary Watercourse crossings. We are of the belief that these Ordinary Watercourses will have baseflows. Therefore, the applicant will need to manage these flows appropriately if they will be trenching across the watercourses.</p>	<p>Devon County Council</p>	<p>This is noted and addressed in the ES and DCO Application.</p> <p>The impact of the Proposed Development in terms of hydrology and flood risk is considered in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3). Prior to construction, geomorphological surveys will be undertaken on ordinary watercourses that may be crossed by trenched techniques. Surveys will be used to inform detailed design of crossing methodologies prior to construction. Crossing methodologies are considered in Volume 1, Appendix 3.2: Onshore Crossing Schedule of the ES (Document Ref: 6.1.3.2).</p> <p>Construction phase drainage requirements will be confirmed in the Outline CEMP, developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7). This will include measures required to manage works in or adjacent to ordinary watercourses with baseflows.</p> <p>Trenched techniques may be used, where appropriate, for minor ditches or smaller watercourses that are frequently dry. Measures put in place to protect water quality and flow are set out in Table 3.25 of Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).</p> <p>An outline method statement for the proposed crossing methodologies will be included in the Outline On-CEMP (Document Ref: 7.7). This method statement will be developed further in consultation with the Environment Agency and Lead Local Flood Authority during the detailed design stage.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Watercourse crossings	Some of these crossings might be of culverts or subterranean flows (between the 'sinks' and 'issues' points on the OS Maps). Therefore, these crossings will need to be carefully designed if they cannot be avoided. The flows will need to continue to be conveyed.	Devon County Council	<p>This is noted and addressed in the ES and DCO Application.</p> <p>The impact of the Proposed Development in terms of hydrology and flood risk is considered in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3). The impact of increased flood risk arising from watercourse crossings is considered in Section 3.10. The effect is not considered to be significant in EIA terms.</p> <p>Detailed design of watercourse crossings will be undertaken during detailed design post-consent in consultation with the Lead Local Flood Authority and Environment Agency.</p> <p>Crossing design will take into consideration the flow rate and volume conveyed at each watercourse crossing location, in addition to the presence of any existing in-channel structures that can provide an existing constraint on watercourse flows within proximity to proposed crossing locations (distance to be ascertained at detailed design stage). Temporary crossings serving the haul road will be removed and land will be reinstated to its original condition before the end of the construction phase.</p> <p>Construction of the watercourse crossings will be managed through the Onshore CEMP, developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7).</p>	N
Land drainage consents	The Applicant has noted, within sections 1.5.60 and 1.6.56 of the Flood Risk Assessment, that the Flood Risk Activity Permit and Land Drainage Consent processes will be 'disapplied and incorporated as protected provisions of the consent order'. The applicant should clarify how this could work. DCC's Flood and Coastal Risk Management Team will still need to log these as Land Drainage Consents to issue the certificates and charge for the service.	Devon County Council	<p>This is noted and addressed in the DCO Application. The Applicant engaged further with the Council on the issue of Land Drainage Consents on 9 October 2024.</p> <p>Following this, the Applicant reviewed requirements for Land Drainage Consents and notes that Land Drainage Consents will be sought where required from the Council.</p> <p>This is confirmed in the Other Consents and Agreements document (Document Ref: 7.21) and is referenced in the Commitments Register, which forms Appendix 3.1 to the ES (Document Ref: 6.1.3.1).</p>	N

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Ground conditions				
Contamination	<p>Volume 2 Chapter 4 Ground Conditions does include land contamination although the majority of this section discusses ground water impacts which is an area that the Environment Agency would need to provide comment. As you may be aware, the Torridge district has no sites designated as contaminated land however, previous land use may have resulted in potentially contaminated ground conditions that have not been recorded. The proposed development site appears to include areas where there is the potential for land contamination, such as the coal mining seam identified within the PEIR. Whilst the proposed development is not introducing long term sensitive receptors (eg. new dwellings) to the locality, the disturbance of potentially contaminated sites during construction and the mobilisation of such contamination (eg. ground gas) must be considered. Suitable mitigation measures have been outlined in Table 4.20 however, until a better understanding of the ground conditions are available through intrusive ground works, these mitigation measures should not be considered as complete. Para 4.15 indicates that intrusive works will be undertaken for both engineering and environmental purposes which will better inform the mitigation measures and any remedial works required.</p>	Torridge District Council	<p>This is noted and agreed. Additional intrusive ground investigations would be undertaken to inform further detail on the mitigation measures.</p> <p>The impact of existing ground contamination on construction workers and end site users is assessed in Section 4.10 and 4.11 of Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions of the ES (Document Ref: 6.2.4).</p> <p>All construction works will be undertaken in accordance with the On-CEMP(s) (available in outline as Document Ref: 7.7), which will include a discovery strategy and related mitigation measures to manage potentially contaminated land.</p> <p>The On-CEMP(s) will be the subject of post-consent consultation and approval which is a Requirement of the Draft DCO (Requirement 7 - Management Plans) (Document Ref: 3.1).</p>	N

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Historic environment				
Written Scheme of Investigation	The Historic Environment Team (HET) has been extensively liaising with the applicant's archaeological consultant with regard to the ongoing archaeological work being undertaken to inform the Preliminary Environmental Impact Report (PEIR) and the production of the overarching outline written scheme of investigation (WSI) which shall be submitted as part of the supporting information for the Development Consent Order (DCO). The HET has no comments to make on the PEIR other than to advise that a draft version of the overarching outline WSI is submitted to the HET for comments prior to its formal submission as part of the DCO.	Devon County Council	This is noted and has been addressed in the DCO Application. The comments from Devon County Council's Historic Environment Team have been incorporated into Outline Onshore Written Scheme of Investigation (WSI) (Document Ref: 7.8) following their review in October 2024.	N
Fieldwork	In addition and in alignment with Paragraph 211 of the NPPF, as well as detailing the fieldwork and post-excavation tasks to be undertaken, the WSI shall also include details of community engagement with regard to the historic environment and the results of any archaeological investigations undertaken in order to advance the understanding of the significance of any heritage assets. This should include consideration of public participation in fieldwork and public engagement the form of open-days, school and interested party site visits, on-line information and talks to local interest groups.	Devon County Council	This is noted and has been addressed in the DCO Application. The comments are included within the Outline Onshore Written Scheme of Investigation (Document Ref: 7.8). A programme of public outreach relating to the programme of archaeological work will be developed and implemented following commencement to share the findings of the ongoing archaeological investigations. Potential measures for inclusion within this programme include: <ul style="list-style-type: none"> • Public access to, and participation in, the archaeological investigations at selected locations. • Organised visits from local schools and interest groups to the archaeological investigations. • Provision of temporary information displays at suitable locations such as Bideford Library. • Presentation of information on appropriate websites. • Presentation of information through public lectures and talks 	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Convertor station design	The information supplied does not give detailed information in relation to the appearance and scale of the transformer building nor the levels for the building. The Route of the cable corridor is not shown in any more detail than the initial enquiry and as such the assessment of visual impact on the setting of heritage assets along this corridor cannot be fully quantified at this stage.	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>The assessment of impacts and effects is presented within Sections 2.10 to 2.12 of Volume 2, Chapter 2: Historic Environment of the ES (Document Ref: 6.2.2).</p> <p>Additional detail is provided in Volume 2, Appendix 2.4: Settings Assessment of the ES (Document Ref: 6.2.2.4). Visualisations have been produced to support this assessment - these are presented within Volume 4, Appendix 2.5: Landscape Visualisations (Document Ref: 6.4.2.5).</p> <p>A further visualisation in relation to the Scheduled Monument at Higher Kingdon is provided in Figures 5-7 in Volume 2, Appendix 2.4: Settings Assessment of the ES (Document Ref: 6.2.2.4).</p>	N
Archaeology and history	Page 24 para 2.5.7 Archaeology and history - will this be expanded and enhanced?	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>The detailed appraisal of the archaeological and historic baseline within the defined study area is presented within Volume 2, Appendix 2.1: Historic Environment Desk-based Assessment of the ES (Document Ref: 6.2.2.1), and summarised within Volume 2, Chapter 2: Historic Environment of the ES (Document Ref: 6.2.2), section 2.7.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Design	Page 33 – details of the joint bays and link boxes are not provided. The detail of these features needs to be plotted on the route so that the overall impact on both visual and practical use of the land can be evaluated.	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>This issue of link boxes and joint bays is assessed within sections 2.10 to 2.12 of Volume 2, Chapter 2: Historic Environment of the ES (Document Ref: 6.2.2), with additional detail provided in Volume 2, Appendix 2.4: Settings Assessment of the ES (Document Ref: 6.2.2.4).</p> <p>Indicative sections have been provided for the link boxes within the Indicative Converter Site plan, section and engineering drawings (Document Ref: 2.6). These are similar for all designated heritage assets other than those impacted by the development at the Converter Site.</p> <p>The joint bays would be located underground. Once construction work has been completed, the land within the construction corridor and the compounds would be reinstated to its former use and all equipment removed, leaving no noticeable trace above ground.</p> <p>Accesses required for link boxes would be flush with the existing surface at each location, however these areas would need a fence to prevent collision between farm equipment and the link box maintenance covers. Where possible, the link box locations will be installed adjacent to hedgerows or field boundaries to minimise the area affected by fencing.</p>	N

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Maximum design scenario	<p>Page 27- Para 2.14 Maximum design scenario table.</p> <p>This is where the onshore HVDC cable link boxes and joint bays are noted. The table is noted but details of the linkboxes and joint bays are requested.</p> <p>Page 49-50 Table 2.17 Summary of potential environmental effects. – Noted but is the historic landscape really a low sensitivity of receptor especially during the construction phase?</p>	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>These details are set out within Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p> <p>Indicative sections have been provided for the link boxes within the indicative converter site plan, section and engineering drawings (Document Ref: 2.6).</p> <p>The attributions of sensitivity/value are set out in Table 2.8 of Volume 2, Chapter 2: Historic Environment of the ES (Document Ref: 6.2.2).</p> <p>These attributions apply unchanged for all stages of the Proposed Development – construction, operation and maintenance, and decommissioning.</p>	N
Future monitoring	<p>Page 33-Future Monitoring para 2.8.18 – once construction work has been completed there would be no impacts (visual and/or noise) in respect of the settings of the designated heritage assets – can this be stated definitively at this stage?</p>	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>This would be the case for all designated heritage assets other than those impacted by the development at the Converter Site.</p> <p>This issue is addressed within sections 2.10 to 2.12 of Volume 2, Chapter 2: Historic Environment of the ES (Document Ref: 6.2.2), with additional detail provided in Volume 2, Appendix 2.4: Settings Assessment of the ES (Document Ref: 6.2.2.4).</p>	N
Impact on heritage assets	<p>Para 2.8.21 – Impacts on designated heritage assets as a result of change within their settings during construction would be indirect (non -physical) and short term. – need short term to be quantified in relation to construction and maintenance.</p> <p>The findings under these paragraphs may be premature given the paucity of detail at this stage.</p>	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>This issue is addressed within sections 2.10 to 2.12 of Volume 2, Chapter 2: Historic Environment of the ES (Document Ref: 6.2.2), with additional detail provided in Volume 2, Appendix 2.4: Settings Assessment of the ES (Document Ref: 6.2.2.4).</p> <p>'Short term' is defined as 'a period of months, up to one year', as set out in Volume 1 Chapter 5: Methodology of the ES (Document Ref: 6.1.5).</p> <p>Any potential impacts occurring during the operation and maintenance phase may be long-term.</p>	N

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Lighting	Para 2.8.28 – the need for lighting on the development for security could impact on the wider landscape.	Torridge District Council	<p>This is noted and has been addressed in the ES and the DCO Application.</p> <p>The potential impacts of construction lighting and operational lighting on the character of the historic landscape have been included within the assessments presented in sections 2.10 to 2.12 of Volume 2, Chapter 2: Historic Environment of the ES (Document Ref: 6.2.2).</p> <p>Construction site lighting would only operate when required and would be designed, positioned and directed to avoid unnecessary illumination of adjacent properties, sensitive ecological receptors and users of public footpaths.</p> <p>Construction site lighting will be designed in accordance with latest relevant available guidance and legislation and the details of the location, height, design and luminance of lighting to be used will be detailed within the Onshore Construction Environmental Management Plan(s) (On-CEMP(s)). The design of the construction site lighting will accord with the details provided in the Outline On-CEMP (Document Ref: 7.7).</p> <p>Operational lighting at the Converter Site would be designed in accordance with the Design Principles Statement (Document Ref: 7.4), as well as the latest guidance and legislation. The details of the location, height, design and luminance of lighting to be used would be provided as part of the detailed design.</p> <p>The operational lighting would be designed to avoid illumination of areas beyond the operational site. This would include directional lighting to minimise overspill into the surrounding landscape.</p> <p>Operational outdoor lighting at the Converter Site boundary would normally be restricted to motion-activated security lighting.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Impact on historic landscape</p>	<p>Page 36 – para 2.8.38 Impact on the Character of the Historic Landscape.</p> <p>This takes into account hedgebanks but not the cable corridor in terms of use or restrictions in previous farming activity.</p>	<p>Torrige District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>The cable will be buried at a sufficient depth along the cable route for previous farming activity to recommence above ground following construction.</p> <p>The impacts of the change in land-use within the cable corridor during construction are included within the assessment presented in section 2.10 of Volume 2, Chapter 2: Historic Environment of the ES (Document Ref: 6.2.2).</p> <p>Additional detail is provided in Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8). Section 8.10 assesses the impact of the Proposed Development on agricultural land quality and access to landholdings.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Human health				
Human health	<p>We acknowledge that the associated documents for human health reflect previous discussions held with the consultants and comments submitted to address the issues raised in relation to public health.</p> <p>Although there are a number of minor adverse issues highlighted, these were not significant in terms of this Environmental Impact Assessment. Where appropriate further measures will be put in place as planning progresses to mitigate against potential adverse effects through normal industry practice. If we become aware of any further issues we may address these through working with other agencies.</p> <p>As some issues identified may become of public concern these will be addressed through ongoing consultation or additional measures. However, as we know some issues may become a foci of media, public, or political concern so we will assess any public health response, should the need arise.</p> <p>It is noted that the scheme aims to provide additional energy security to the UK, which all things considered brings a 'moderate beneficial' public health impact to the whole population.</p>	Devon County Council	<p>This is noted and has been addressed in the ES.</p> <p>The human health impacts of the Proposed Development are set out in Volume 4, Chapter 4: Human Health of the ES (Document Ref: 6.4.4). Mitigation measures adopted as part of the Proposed Development pertaining to human health are outlined in section 4.8.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Active travel	Percentage of physically active adults (19+ years) - We know from Active Lives survey 2020, that Torridge has the highest levels of inactivity in Devon. The opportunity to use active travel is therefore essential to these identified groups. Disturbance to existing opportunities would have a negative impact.	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>The Applicant appreciates Torridge District Council's recognition of the importance of the Public Rights of Way (PRoW) network, particularly the Tarka Trail and South West Coast Path, as both recreational and economic assets.</p> <p>Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8) includes plans to manage any potential disruptions to recreational routes, including the Outline PRoW Management Plan (Document Ref: 7.11) to be submitted as part of the DCO application.</p> <p>Volume 4, Chapter 4: Human Health of the ES (Document Ref: 6.4.4) assesses the potential impacts associated with the construction and decommissioning for the Proposed Development on public open spaces and disruption of PRoWs in Section 4.10.</p> <p>There is considered to be a minor adverse effect arising from the impact of the construction phase on open space, leisure and play.</p> <p>Although the scientific literature supports a clear association between recreational and leisure activities and health outcomes, there is likely to be at most a slight change in the population health baseline. This would have at most a marginal effect on health policy delivery and is not expected to change population health inequalities.</p>	N

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Landscape and visual impact				
Rochdale approach	It is difficult to assess the landscape aspects of the PEIR without detailed drawings, sections, montages etc. The Council understands that the project has been put forward with a 'maximum design approach' (Rochdale) however this has limited the opportunity to examine the project in a meaningful way.	Torridge District Council	<p>A number of drawings, figures and landscape visualisations were included in the PEIR as figures and appendices. In keeping with the 'preliminary' nature of a PEIR, these documents were not produced to the same level of detail as is required for an EIA or for later stages of the Proposed Development. The relevant level of detail will be produced once available and will be subject to further consultation with Torridge District Council.</p> <p>The adoption of the Rochdale approach allowed for a meaningful EIA to take place by defining a 'maximum design scenario' on which to base the identification of likely environmental effects. The maximum design scenario is the scenario that would give rise to the greatest impact (and subsequent effect). By identifying the maximum design scenario for any given impact, it can be concluded that the impact (and therefore the resulting effect) would be no greater for any other design scenario.</p> <p>The use of the PDE approach has been recognised in the Overarching National Policy Statement (NPS) for Energy (NPS EN-1) (DESNZ, 2023a), the NPS for Renewable Energy Infrastructure (NPS EN-3) (DESNZ, 2023b) and the NPS for Electricity Networks Infrastructure (NPS EN-5) (DESNZ, 2023c).</p> <p>The Applicant has engaged with the Torridge District Council landscape lead in a number of meetings since the completion of Statutory Consultation. This includes review of the proposed landscape masterplan and review and commentary on the Outline Landscape and Ecology Management Plan (LEMP) (Document Ref: 7.10). Comments on the Outline LEMP will be incorporated in the next update of the LEMP provided at the next appropriate deadline for the examination.</p>	N

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<p>Visual impact</p>	<p>8.8.25 / 8.8.26 – this does not take into account any visual blighting or noise disruption that could reasonably impact on the enjoyment of the environs for the users of the routes. Looking simply at the physical disruption to the routes is too simplistic and does not fully appraise the potential impacts. This is of particular concern for the SWCP and other areas that fall within the National Landscape (AONB) and the Undeveloped Coast, recognising that these areas are known for their tranquillity and unspoilt nature. The users of these routes are therefore have the scope to be particularly sensitive receptors to any disruption caused by the works.</p>	<p>Torrige District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>The potential visual impacts during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>As the Onshore HVDC Cable Corridor would be underground, the effects experienced by visual receptors would be temporary and almost exclusively during the construction phase. However, while construction is ongoing, people using the PRoW within 1km are likely to have some views of the construction works. The largest impacts would be where people have views of the construction compounds containing the plant used in the major crossing points, i.e. people using the South West Coast Path and those using the Tarka Trail. The following measures are proposed as part of the Proposed Development to mitigate potential impacts on seascape, landscape and visual resources:</p> <ul style="list-style-type: none"> • The preparation of a detailed Landscape and Ecology Management Plan in general accordance with the Outline Landscape and Ecology Management Plan (Document Ref: 7.10), which has been submitted with the application for development consent. The Outline Landscape and Ecology Management (Document Ref: 7.10) sets out design commitments to avoid impacts on landscape character and visual receptors. This includes: <ul style="list-style-type: none"> ○ burying Onshore HVDC and HVAC Cables below ground; ○ the utilisation of cut and fill techniques (and land-modelling) to reduce the visibility of the Converter Site; ○ landscape planting at the Converter Site and along the Onshore HVDC Cable Corridor to assist with softening and screening views. 	<p>N</p>
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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
			<ul style="list-style-type: none"> ○ The preparation of Design Principles Statement (Document Ref: 7.4). The Design Principles Document will ensure the Converter Station adopts an architectural design that is sympathetic to the surrounding area and uses appropriate materials, colours and finishes. <p>Noise impacts are considered in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6).</p> <p>Effects of major adverse significance have been identified where trenchless techniques are required to install the Onshore HVDC Cable Corridor. This is due to the high noise levels associated with the HDD construction plant, as well as the potential need for night-time working where existing noise levels are low.</p> <p>The significance of this effect may be reduced by using quieter equipment, limiting night-time working where possible, and adopting mitigation measures for the construction plant items, where available. Providing such measures are adopted, it is possible the significance of this effect may be reduced to minor adverse which is not significant in EIA terms.</p>	

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<p>Visual impact</p>	<p>Very little detail on the specifics of the proposals has been made available as part of the PEIR and assumptions have been made as a result on factors such as visibility, effect of mitigation and effects on landscape elements. Assessments should therefore be treated with some caution and their “preliminary” nature is stressed.</p>	<p>Torrige District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>A number of drawings, figures and landscape visualisations were included in the PEIR as figures and appendices. In keeping with the ‘preliminary’ nature of a PEIR, these documents were not produced to the same level of detail as is required for an EIA or for later stages of the Proposed Development. The relevant level of detail will be produced once available and will be subject to further consultation with Torrige District Council.</p> <p>The potential visual impacts during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>The following measures are proposed as part of the Proposed Development to mitigate potential impacts on seascape, landscape and visual resources:</p> <ul style="list-style-type: none"> • The preparation of a detailed Landscape and Ecology Management Plan in general accordance with the Outline Landscape and Ecology Management Plan (Document Ref: 7.10), which has been submitted with the application for development consent. The Outline Landscape and Ecology Management (Document Ref: 7.10) sets out design commitments to avoid impacts on landscape character and visual receptors. This includes: <ul style="list-style-type: none"> ○ burying Onshore HVDC and HVAC Cables below ground; ○ the utilisation of cut and fill techniques (and land-modelling) to reduce the visibility of the Converter Site; ○ landscape planting at the Converter Site and along the Onshore HVDC Cable Corridor to assist with softening and screening views. ○ The preparation of Design Principles Statement (Document Ref: 7.4). The Design Principles 	<p>N</p>
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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
			Document will ensure the Converter Station adopts an architectural design that is sympathetic to the surrounding area and uses appropriate materials, colours and finishes.	
Baseline studies	There are a small number of very minor clarifications required, but on the whole the baseline studies are comprehensive.	Torridge District Council	This is noted.	N

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<p>Visual impact</p>	<p>Very little detail on the specifics of the proposals has been made available as part of the PEIR and assumptions have been made as a result on factors such as visibility, effect of mitigation and effects on landscape elements. Assessments should therefore be treated with some caution and their “preliminary” nature is stressed. The preliminary assessments are helpful in identifying areas where further design work and mitigation strategies are necessary in order to minimise potential adverse effects.</p>	<p>Torrige District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>A number of drawings, figures and landscape visualisations were included in the PEIR as figures and appendices. In keeping with the ‘preliminary’ nature of a PEIR, these documents were not produced to the same level of detail as is required for an EIA or for later stages of the Proposed Development. The relevant level of detail will be produced once available and will be subject to further consultation with Torrige District Council.</p> <p>Details on the design journey and iterations to date demonstrating where we have incorporated stakeholder feedback are described in the Design Approach Document (Document Ref: 7.3).</p> <p>Moving forward, the Applicant would continue to engage and consult on the design, and it’s impacts in the landscape to ensure stakeholders can contribute to the development. The methodology to secure this commitment in the DCO is through the Design Principles Statement (Document Ref: 7.4) has been submitted with the application for development consent.</p> <p>The details of the design will require the appointment of contractors, who will in turn be required to work with the consultees to reach an acceptable outcome in line with the Design Principles Statement.</p> <p>Consultation and approval of the detailed landscaping design of the Converter Site will be a requirement of the DCO.</p> <p>The following measures are proposed as part of the Proposed Development to mitigate potential impacts on seascape, landscape and visual resources:</p> <ul style="list-style-type: none"> • The preparation of a detailed Landscape and Ecology Management Plan in general accordance with the Outline Landscape and Ecology Management Plan (Document Ref: 7.10), which has been submitted with the application for development consent. The Outline Landscape and Ecology Management (Document Ref: 7.10) sets out design 	<p>N</p>
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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
			<p>commitments to avoid impacts on landscape character and visual receptors. This includes:</p> <ul style="list-style-type: none"> ○ burying Onshore HVDC and HVAC Cables below ground; ○ the utilisation of cut and fill techniques (and land-modelling) to reduce the visibility of the Converter Site; ○ landscape planting at the Converter Site and along the Onshore HVDC Cable Corridor to assist with softening and screening views. <ul style="list-style-type: none"> ● The preparation of Design Principles Statement (Document Ref: 7.4). The Design Principles Document will ensure the Converter Station adopts an architectural design that is sympathetic to the surrounding area and uses appropriate materials, colours and finishes. 	

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
PrOW impacts	Significant visual effects are predicted where public rights of way cross the cable route. Both the South West Coast Path and National Cycle Network (Tarka Trail) routes cross the cable route. An issue that will require further consultation is how temporary significant visual effects on these two major routes will be avoided.	Torridge District Council	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Applicant engaged with Devon County Council representatives responsible for managing PRow on 18 October 2024 to discuss potential impacts on the PRow. The Applicant noted the temporary nature of the visual impacts on users using PRow which are exclusively during the construction phase.</p> <p>The use of HDDs would ensure that there would be no physical effects on the coastal recreational asset, the South West Coast Path, the Tarka Trail or National Cycle Route 3.</p> <p>During construction, people using the PRow within 1km are likely to have some views of the construction works. The largest impacts would be where people have views of the construction compounds containing the plant used in the major crossing points, i.e. people using the South West Coast Path and those using the Tarka Trail. Mitigation measures to address visual impacts during construction are identified in the Outline Onshore CEMP (Document Ref: 7.7) and will be confirmed in the Onshore CEMP, for which Torridge District Council is the relevant consenting body.</p>	N

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<p>Visual impacts</p>	<p>Significant visual effects are predicted for people walking on paths and lanes with views of the converter station construction site. Effects on views from Gammaton Moor, Webbery Cross and viewpoints within around 2km of the site are predicted to be significant adverse. Further development of the construction management plan could address how much scope there is for mitigating these effects during the construction phase.</p>	<p>Torrige District Council</p>	<p>This is noted and has been addressed in the ES and the DCO Application.</p> <p>The potential visual impacts during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>The following measures are proposed as part of the Proposed Development to mitigate potential impacts on seascape, landscape and visual resources:</p> <ul style="list-style-type: none"> • The preparation of a detailed Landscape and Ecology Management Plan in general accordance with the Outline Landscape and Ecology Management Plan (Document Ref: 7.10), which has been submitted with the application for development consent. The Outline Landscape and Ecology Management (Document Ref: 7.10) sets out design commitments to avoid impacts on landscape character and visual receptors. This includes: <ul style="list-style-type: none"> ○ burying Onshore HVDC and HVAC Cables below ground; ○ the utilisation of cut and fill techniques (and land-modelling) to reduce the visibility of the Converter Site; ○ landscape planting at the Converter Site and along the Onshore HVDC Cable Corridor to assist with softening and screening views. ○ The preparation of Design Principles Statement (Document Ref: 7.4). The Design Principles Document will ensure the Converter Station adopts an architectural design that is sympathetic to the surrounding area and uses appropriate materials, colours and finishes. 	<p>N</p>
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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
			Construction phase visual impacts will be managed through the Onshore CEMP, developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7).	
Landscape character	<p>Significant and not significant moderate adverse temporary effects are predicted to landscape character areas and character types along the cable route and the cable landfall.</p> <p>At the Landfall adverse effects are predicted to the quality of tranquillity on the undeveloped coast. We would expect further development of the construction management plan to explore how these inevitable effects could be mitigated so that it is the smallest possible area that is affected</p>	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>The potential visual impacts during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>As the Onshore HVDC Cable Corridor would be underground, the effects experienced by visual receptors would be temporary and almost exclusively during the construction phase.</p> <p>However, while construction is ongoing, people using the PRow within 1km are likely to have some views of the construction works. The largest impacts would be where people have views of the construction compounds containing the plant used in the major crossing points, i.e. people using the South West Coast Path and those using the Tarka Trail. The following measures are proposed as part of the Proposed Development to mitigate potential impacts on seascape, landscape and visual resources:</p> <p>Construction phase visual impacts will be managed through the Onshore CEMP, developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7). The Onshore CEMP would be approved by Torrige District Council.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Hedgerows	On the cable route, significant adverse effects are predicted in areas where the cable route will cut through hedgebanks and sunken lanes. A cable corridor has been proposed, but a more detailed exploration of crossing points of lanes and hedge boundaries and exploration of non-trenching cabling techniques could mitigate the worst effects of the cable construction.	Torridge District Council	<p>This is noted and has been addressed in the ES and the DCO Application.</p> <p>The potential visual impacts during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>Onshore crossing points are further considered in the Volume 1, Appendix 3.2: Onshore Crossing Schedule of the ES (Document Ref: 6.1.3.2).</p> <p>Hedgerows potentially impacted by the Proposed Development are detailed in the Tree and Hedgerow Schedule (Document Ref: 2.5).</p> <p>Construction phase mitigation measures for managing hedgerow impacts are detailed in the Outline Onshore CEMP (Document Ref 7.7).</p>	N

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<p>Converter station</p>	<p>The converter station and associated earthworks will result in some long term and permanent adverse effects. While it is acknowledged that the converters are sited in a landscape that is already characterised by electricity generating infrastructure, their scale and materiality is at odds with existing developments. Features of the Converter Station that will contribute to their effect on landscape character include the bulk and size of buildings, without much context in the local area, their siting on high ground, prominent in views from the south and east and the form of the earth bunding that is suggested around them.</p>	<p>Torrige District Council</p>	<p>This is noted and has been addressed in the ES and the DCO Application.</p> <p>The potential visual impacts during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>Mitigation measures related to the Converter Station site are outlined in Section 2.8 of Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>The Converter Site will be constructed using a cut and fill technique to reduce visibility of buildings in the landscape.</p> <p>Landscape bunding will be employed to create higher areas of land around the Converter Site.</p> <p>Planting will be provided at the Converter Site to assist with softening and screening the buildings. These measures are set out in an Outline LEMP (Document Ref: 7.10) submitted as part of the DCO application. The Outline LEMP includes:</p> <ul style="list-style-type: none"> • Strengthening and enhancement of existing hedgerow field boundaries within the vicinity of the Converter Site and at replacement hedgerows along the Onshore HVDC Cable Corridor. • Using native and locally appropriate plant species around Converter Site and at replacement hedgerows along the Onshore HVDC Cable Corridor. • Identifying areas where it may be possible to achieve advance planting <p>The detailed design of the Converter Site will be carried out in accordance with the Design Principles Statement (Document Ref: 7.4) and the detailed design for the Converter Site will be approved by Torrige District Council prior to commencement of works – refer to the Requirements in the draft DCO (Document Ref: 3.1) which secures the need for Council approval.</p>	<p>N</p>
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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Visual mitigation	Mitigating measures are suggested, including setting the buildings in the ground, extensive earth mounding, tree planting and a commitment to work with the local authority on the colour palette to be used in the buildings. Some positive steps had been taken towards a detailed mitigation strategy as part of the previous PPA, as summarised in section 2.7 of the SLVIA (Vol.4 Ch2 pp82-84). The submitted site layouts do not include details of how or where the mitigation strategy is to be applied. Further design development during the pre planning period will be necessary in order to make sure that permanent, significant adverse landscape and visual effects are minimised.	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>The potential visual impacts during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>The Applicant has engaged with the Torridge District Council landscape lead in a number of meetings since the completion of statutory consultation. This includes review of the proposed landscape masterplan and review and commentary on the Outline LEMP (Document Ref: 7.10). Comments on the Outline LEMP will be incorporated in the next update of the LEMP provided at the next appropriate deadline for the examination.</p> <p>The detailed design of the Converter Site will be carried out in accordance with the Design Principles Statement (Document Ref: 7.4) and the detailed design for the Converter Site will be approved by Torridge District Council prior to commencement of works – refer to the Requirements in the draft DCO (Document Ref: 3.1) which secures the need for Council approval.</p>	N
Visualisations	The SLVIA contains a limited series of visualisations, as the detail of the proposals and mitigation is still at an early stage. Visualisations are from higher sensitivity viewpoints. Locations are reasonably representative of the range of views of the site from a spread of geographical directions. Visualisations as submitted are not based on a final layout, are not fully rendered and have made no allowance has been made for mitigating plant growth.	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>Visualisations from all representative viewpoints are now included in Appendix 2.5: Landscape Visualisations of the ES (Document Ref: 6.4.2.5).</p> <p>These viewpoints are depicted at Day 0 of operation to show a worst-case scenario and after 15 years of planting.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Visual impact	<p>Siting on a local high spot increases the extent over which the development exerts a visual influence. Mitigation has to work harder to reduce visual impacts (e.g. VP29).</p> <p>The extent of the site and scale of the structures is out of context in the local landscape. The site is very large in comparison with farmsteads in the same view (e.g. VP32). Existing hedgerow trees are lower than the roofline of the proposed buildings (e.g. VP33).</p>	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>The potential visual impacts of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>The Converter Site will be constructed using a cut and fill technique to reduce visibility of buildings in the landscape. The detailed design will be incorporate the need to balance the cut and fill with appropriate sizing of landscaped bunds to mitigate the visual influence of the Converter Site.</p> <p>The Applicant has engaged with the Torridge District Council landscape lead in a number of meetings since the completion of Statutory Consultation. This includes review of the proposed landscape masterplan and review and commentary on the Outline LEMP (Document Ref: 7.10). Comments on the Outline LEMP will be incorporated in the next update of the LEMP provided at the next appropriate deadline for the examination.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Visual mitigations</p>	<p>Mitigation by mounding is effective in reducing influence on views where the buildings are on the skyline, but judgement is needed as to how high the mounding could go before it becomes an obtrusive landscape element itself.</p>	<p>Torridge District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>The potential visual impacts of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>The Applicant has engaged with the Torridge District Council landscape lead in a number of meetings since the completion of statutory consultation. This has included discussions on the height of landscape bunding. At the request of the Council's landscape lead, the Applicant has lowered the proposed height of the landscaped bunds to provide a more sympathetic landscape led approach to the bunds. As requested by the Council landscape lead, tree planting will be used in coordination with the landscape bunding to minimise the visual influence of the buildings on the skyline.</p> <p>Visualisations from all representative viewpoints are included in Appendix 2.5: Landscape Visualisations of the ES (Document Ref: 6.4.2.5). These viewpoints are depicted at Day 0 of operation to show a worst-case scenario and after 15 years of planting.</p> <p>The potential for significant landscape impacts from the Converter Site and the need to integrate the buildings into the landscape as far as possible is recognised by the Applicant.</p> <p>A mitigation strategy within the Outline LEMP (Document Ref: 7.10) has been submitted as part of the DCO application. It includes enhancement of hedgerows and woodlands, as well as restoration/creation of hedgerows and woodlands, which link existing landscape elements.</p>	<p>N</p>

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Visual impact</p>	<p>The PEIR predicts major adverse effects to views from the lane to the west of the site. Moderate adverse effects are predicted from views to the north, east and south of the site up to about 3km distance. These effects are predicted to decrease with time, as mitigating planting matures. Our own view is that the development and the proposed mounding will markedly change the character and quality of views in an area up to 3km from the site. The extent to which proposals can be integrated into the landscape and their level of significance will very much depend on decisions made during the design stage of the project.</p>	<p>Torrige District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>The potential visual impacts of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2). Measures to enable mitigation of the visual impact of the converter station site are outlined in Section 2.8.</p> <p>Planting will be provided to assist with softening and screening the buildings. These measures are set out in an Outline LEMP (Document Ref: 7.10) submitted as part of the DCO application. The Outline LEMP includes:</p> <ul style="list-style-type: none"> • Strengthening and enhancement of existing hedgerow field boundaries within the vicinity of the Converter Site and at replacement hedgerows along the Onshore HVDC Cable Corridor. • Using native and locally appropriate plant species around Converter Site and at replacement hedgerows along the Onshore HVDC Cable Corridor. • Identifying areas where it may be possible to achieve advance planting. <p>The detailed design for the Converter Site, including landscape bunds requires approval by Torrige District Council in accordance with the Design Principles Statement (Document Ref: 7.4). Similarly, the LEMP requires approval by Torrige District Council. This provides the Council with an active role in influencing and approving the final form of the landscaping bunds to ensure that visual impacts are mitigated as far as practicable.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Landscaping	A comprehensive and effective landscaping scheme to deliver tree planting, hedge creation and widening would provide an opportunity for long-term environmental enhancements.	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>The potential visual impacts of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>Approach to biodiversity enhancement is also set out in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), specifically in section 1.8.</p> <p>A proposed landscape masterplan for the Converter Site is included in the Outline LEMP (Document Ref: 7.10).</p> <p>This includes habitat creation at the Converter Site, including features which increase connectivity with habitat features beyond the site. This also provides mitigation habitat for protected species such as dormice, bats and breeding birds.</p> <p>The detailed design for the Converter Site, including landscaping requires approval by Torrige District Council in accordance with the Design Principles Statement (Document Ref: 7.4).</p> <p>Similarly, the LEMP requires approval by Torrige District Council as established by a Requirement in the draft DCO (Document Ref: 3.1). This provides the Council with an active role in influencing and approving the final form of the landscaping within the Converter Site.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Land use and recreation				
PRoW	Although it is a beautiful rural area, Northern Devon does not have a good network of public footpaths or many areas of open space that are widely accessible. If this project could deliver greater access to the countryside for residents, that would be of significant benefit. Linked with this and the need to promote active travel, a specific project could be creating a new cycling/walking route to link the south and west of Bideford with the coast path.	Torridge District Council	<p>This is noted and has been addressed in the DCO Application.</p> <p>An Outline Public Rights of Way Management Plan (Document Ref: 7.11) has been submitted as part of the DCO application to limit the disruption to PRoWs and other recreational routes during the construction of the Proposed Development.</p> <p>The Applicant is required to return land within the onshore HVDC cable corridor to current landowners to continue their existing use. The Applicant has no legal ability to develop public footpaths as part of the Proposed Development and as such, provision of public footpaths to connect the countryside is not part of the Proposed Development.</p> <p>The Applicant notes that the provision of a footpath from Manteo Way to the temporary construction compound on Gammaton Road is under consideration as part of the proposed highway works. The Applicant will develop the design for these works in consultation with Devon District Council as the relevant highway authority, taking into consideration any requests by residents on Gammaton Road.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Cabling route	The Council has previously suggested that the cabling route used by Xlinks could be converted into a cycle path, but it is understood that this area will be subject to easements and remain within the original landownership. However, funding could be provided to develop/enhance existing footpaths and other off-road paths between Landcross and the Abbotsham Cliffs area in order to create a good quality cycling and/or walking route that connects the Tarka Trail with the coast path.	Torrige District Council	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Applicant met with Torrige District Council and Devon County Council on 4 October 2024 to present its initial approach to a Community Benefit Fund and will continue to work with the councils to develop the fund in a way that has a genuine and meaningful benefit for the community.</p> <p>The Applicant is exploring how it can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, which may include the tender of work packages during the construction of the project and through the establishment of a community benefit fund.</p> <p>The Applicant continues to engage with Torrige District Council and Devon County Council, as well as other key local stakeholders, to develop a community benefit package that responds the local need and will share more information during examination. The Applicant will engage with the community as its plans mature to make sure that community voice has a role in refining its package to meet local needs. The Applicant will seek to create a lasting benefit for the community and will develop its plans to leverage where possible the good existing community work which is already underway.</p> <p>Any proposals for funding enhancement of existing footpaths will be considered in accordance with the terms of the community benefit fund and assessed by an independent grant making body. The Applicant notes that landowner agreement for the development or enhancement footpaths would be required prior to any proposed works being started.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Cumulative impacts	<p>Paragraph 8.11.3 – Even though the paragraph highlights that projects and plans includes those identified within the relevant Development Plan (Tier 3), the subsequent table (8.16) does not identify any local plan allocations as part of the potential Cumulative Environmental Assessment. There are a range of development sites allocated within the adopted North Devon and Torridge Local Plan 2011-2031 (www.torridge.gov.uk/ndt1p) that should be appraised and reviewed as part of this process. An online interactive map that may assist in spatially identifying relevant allocations and associated proposals can be found via www.torridge.gov.uk/ndt1p/maps. Most notably, the Council would draw attention to allocation BID04 - Site South of East-the-Water (www.torridge.gov.uk/ndt1p/bid04) that lies adjacent to the proposed site compound at Gammaton Road, East-the-Water.</p>	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>Tier 3 has been updated with details of Local Plan allocations, including BID04, as part of the cumulative impacts assessment in Section 8.13 of Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8).</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Local policy	<p>Table 8.3 – the identified policies are unlikely to be fully representative of all of the development plan policies relevant to the considerations of the topic in hand. In particular, would suggest that it may be pertinent to review and include references as deemed appropriate to:</p> <ul style="list-style-type: none"> • Policy ST02: Mitigating Climate Change – in particular clauses (b), (d) and (e) • Policy ST07: Spatial Development Strategy for Northern Devon’s Rural Areas • Policy ST09: Coast and Estuary Strategy – in particular clause (7) • Policy ST11: Delivering Employment and Economic Development – in particular clauses (3), (6) and (7) • Policy ST14: Enhancing Environmental Assets – in particular clauses (a), (b), (d) and (h) • Policy DM01: Amenity Considerations • Policy DM02: Environmental Protection • Policy DM03: Construction and Environmental Management • Policy DM08: Biodiversity and Geodiversity – in particular clause (1) <p>The Council would highlight that the development plan does not only comprise the North Devon and Torridge Local Plan 2011-2031, but also the adopted Minerals Plan and the Waste Plan, along with a series of neighbourhood plans (although those neighbourhood plans currently made are unlikely to be of direct relevance due to their geographic distance).</p>	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>Where relevant, additional polices have been added into Table 8.3 of Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8). The application’s compliance with Local Plan policies is considered in Policy Compliance Assessment Table 5 - North Devon and Torridge Local Plan 2011 – 2031.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Typos	Table 8.14 – There is reference to the Wales Coast Path in terms of potential impact. It is assumed that this is a drafting error and that it should rather be the South West Coast Path?	Torridge District Council	This is noted and has been addressed in the ES. The typographical error has been rectified in Table 8.14 of Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8).	N
Typos	Table 8.14 – There is reference to the Wales Coast Path in terms of potential impact. It is assumed that this is a drafting error and that it should rather be the South West Coast Path? Table 8.15 – There is reference to the Mona Proposed Onshore Development Area, which would appear to be located in North Wales. It is assumed that this is a drafting oversight and it should related to the area of the local Onshore Development Area for the proposed project in Torridge?	Torridge District Council	This is noted and has been addressed in the ES. These two typographical errors have been rectified in Tables 8.14 and 8.15 of Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8).	N
Soils	Table 8.15 – Welcome the recognition of the importance of mitigating and minimising the impact on soils, given the significance of agriculture to the local area. Important that, where possible, agricultural land is restored so that it can return to productive agricultural use.	Torridge District Council	This is noted and has been addressed in the DCO Application. An Outline Soil Management Plan is incorporated in the Outline Onshore CEMP (Document Ref: 7.7) submitted as part of the DCO application, and contains measures to manage stripping, storage and restoration of soils during the construction of the Proposed Development.	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
PRoW	<p>Table 8.15 – Welcome the proposal to prepare both an outline and more detailed Public Rights of Way (PRoW) management plan(s). The PRoW network, and in particular the Tarka Trail and South West Coast Path, are important assets and valued both locally and by visitors for their recreation, health and wellbeing value. They are also an economic driver for an area that is renowned for its environmental quality. It is crucial that the programme of works, along with the design of individual work locations and layout of operational compounds, access routes and wider works has regard to minimising disruption to the PRoW network. It is important that consideration is not only afforded to the need for the stopping up or diversion of footways but also the impact of construction activity that could adversely affect the users of the PRoW, as this could have an adverse impact on health & well-being and potentially on the visitor economy – as a result of either perceived or actual deterioration of the environs during construction activity.</p>	<p>Torridge District Council</p>	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Outline Public Rights of Way Management Plan (Document Ref: 7.11) submitted as part of the DCO application, includes measures for the management of the PRoW network during the construction of the Proposed Development.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Noise	<p>8.8.24 The Council is concerned that the conclusion reached on the impact on the Coastal Areas may not take into account the potential for nuisance caused by the noise of construction. The area of coast within which the cable landfall lies is designated as Undeveloped Coast within the adopted development plan (North Devon and Torridge Local Plan 2011-2031), recognising its unspoilt nature. The area tends to be tranquil, so any nearby construction activity has the potential to have an adverse impact on recreational users of the coast by virtue of both noise and visual disruption of the unspoilt landscape. This does not currently appear to be a consideration in the assessment but should however be acknowledged and appraised when determining the magnitude of impact.</p>	<p>Torridge District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>Noise impacts are considered in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6).</p> <p>Effects of major adverse significance have been identified where trenchless techniques are required to install the Onshore HVDC Cable Corridor. This is due to the high noise levels associated with the HDD construction plant, as well as the potential need for night-time working where existing noise levels are low.</p> <p>The significance of this effect may be reduced by using quieter equipment, limiting night-time working where possible, and adopting mitigation measures for the construction plant items, where available. Providing such measures are adopted, it is possible the significance of this effect may be reduced to minor adverse which is not significant in EIA terms.</p> <p>The Outline Onshore CEMP (Document Ref: 7.7) includes measures to manage potential noise impacts associated with the Proposed Development.</p> <p>Noise mitigation measures will be confirmed through the development of the Onshore CEMPs in accordance with the Outline Onshore CEMP (Document Ref: 7.7).</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Noise & visual impact</p>	<p>8.8.25 As per the comments on Coastal Areas above, the conclusions reached on the potential impact to the Coastal Path and Tarka Trail section of NCR 27 appears to have focused on the notion that there will be no physical impairment to the routes. Whilst this is accepted, it does not however appear to take account of the potential scope for the construction works to have an adverse impact on the experience of the user and the scope for the local environs to be adversely affected by construction activity, due to both noise and visual impact on what is in places an unspoilt and tranquil setting.</p>	<p>Torrige District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>Noise impacts are considered in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6).</p> <p>As the Onshore HVDC Cable Corridor would be underground, the effects experienced by visual receptors would be temporary and almost exclusively during the construction phase. However, while construction is ongoing, people using the PRow within 1km are likely to have some views of the construction works. The largest impacts would be where people have views of the construction compounds containing the plant used in the major crossing points, i.e. people using the South West Coast Path and those using the Tarka Trail.</p> <p>The potential visual impacts during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2). Taking into account the mitigation measures described in the ES chapter, significant adverse effects are expected, as summarised in Section 2.18 of the ES chapter.</p> <p>An onshore CEMP will be developed and approved by Torrige District Council prior to the start of construction, based on the principles set out in the Outline On-CEMP (Document Ref: 7.7), submitted as part of the DCO application.</p> <p>The On-CEMP(s) would incorporate measures to ensure that any potential environmental impacts would be minimised during construction. The On-CEMP(s) would include measures to maintain and address issues including impacts related to noise and to landscape and visual amenity.</p> <p>The Outline Public Rights of Way Management Plan (Document Ref: 7.11) submitted as part of the DCO application, also includes measures for the management of the PRow network during the construction of the Proposed Development.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Assessment	8.8.29 – would question the conclusion of low magnitude. Does this not have the potential to have a more disruptive effect, given the nature of the recreational activity – fishing which is renowned for its associated tranquillity? Would question whether this could have a more fundamental impact on the likely usage of the lakes for this activity over the duration of the works, with an associated impact on the host business/ club. It is however recognised that given the fact that activity associated to cable laying is likely to be transient and short-lived.	Torridge District Council	This is noted and has been addressed in the ES. The equivalent assessment in Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8), Section 8.10.25 assesses the sensitivity of the receptor as medium. This assessment is based on there being "limited alternative facilities available locally", with the facilities being used reasonably frequently.	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Enjoyment of environment</p>	<p>8.8.32 – the assessment would appear to be too narrow in its scope. This would appear to overlook the potential disruption to users (receptors) from any nearby construction activity – impacting on the enjoyment of the environs and recognising the often tranquil nature of these routes, particularly in the Undeveloped Coast and National Landscape (AONB).</p>	<p>Torridge District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>The potential visual impacts during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2). Taking into account the mitigation measures described in the ES chapter, significant adverse effects are expected, as summarised in Section 2.18.</p> <p>As the Onshore HVDC Cable Corridor would be underground, the effects experienced by visual receptors would be temporary and almost exclusively during the construction phase. However, while construction is ongoing, people using the PRow within 1km are likely to have some views of the construction works. The largest impacts would be where people have views of the construction compounds containing the plant used in the major crossing points, i.e. people using the South West Coast Path and those using the Tarka Trail.</p> <p>An onshore Construction Environmental Management Plan (On-CEMP) will be developed and approved by Torridge District Council prior to the start of construction, based on the principles set out in the outline On-CEMP (Document Ref: 7.7), submitted as part of the DCO application.</p> <p>The On-CEMP(s) would incorporate measures to ensure that any potential environmental impacts would be minimised during construction. The On-CEMP(s) would include measures to maintain and address issues including impacts related to noise and to landscape and visual amenity.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Cumulative impacts	Appendix 5.3 – Table 1.2 - Whilst Development Plan allocations are stated to be screened in to the assessment and search criteria for the CEA long list (onshore) this does not appear to have happened. Table 1.3 identifies that these will be assigned as Tier 3, in terms of assigning uncertainty. No projects appear to have been identified from the adopted Local Plan in Table A.1.	Torridge District Council	This is noted and has been addressed in the ES. Tier 3 has been updated with details of Local Plan allocations, including BID04, as part of the cumulative impacts assessment in Section 8.13 of Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8).	N

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<p>Cumulative impacts</p>	<p>There are likely to be a range of sites allocated in the adopted North Devon and Torridge Local Plan 2011-2031 that fall within the area of search considered for the proposal; including one or more which have the potential to be impacted by, or impact upon, the proposals. The interactive local plan policies map (www.torridge.gov.uk/ndtlp/maps) provides an effective tool for identifying potential local plan allocations and proposals which could fall in scope. The Council would encourage the inclusion and review of all relevant allocations from the development plan that fall within the 10km area of search for the proposal.</p> <p>Most notable is allocation BID04 for approximately 600 new dwellings, along with other associated infrastructure, which lies adjacent to the proposed main site compound at the top of East-the-Water on Gammaton Road. Concerns that the location and operation of this compound could prejudice the likelihood of the allocation coming forward in the short to medium term, or that if it should proceed, then the location of the compound could cause amenity issues with future occupiers of new dwellings that could be located adjacent to the proposed compound. This could also result in noise complaints which have the potential to prejudice construction operations. Would highlight that development of the allocation is likely to have to take place in an east-to-west direction due to the availability of highway access, which is anticipated to be formed onto Gammaton Road. Should widening works be undertaken to Gammaton Road, along the stretch of highway close to the junction with Manteo Way, the proposals should be mindful as to the future likely requirements for the formation of a highway access to land to the south and east to service significant residential development.</p>	<p>Torridge District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>Tier 3 has been updated with details of Local Plan allocations, including BID04, as part of the cumulative impacts assessment in Section 8.13 of Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8).</p>	<p>N</p>
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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Cumulative Impacts</p>	<p>The Council has concerns that the proposed cable corridor has the potential to prejudice the opportunity to accommodate necessary future strategic growth of Bideford in the medium to long term. Whilst the proposed cable corridor avoids land allocated for future growth within the adopted North Devon and Torrington Local Plan 2011-2031, it encircles Bideford to the West and South in relative close proximity to the existing and proposed built form of the settlement. Given that Bideford is the largest settlement in the District, identified as the Strategic Centre within the adopted North Devon and Torrington Local Plan and is one of the most sustainable locations in northern Devon to accommodate growth, it is important to safeguard opportunities for its ongoing strategic growth in the future. Without prejudice to establishing future locations for accommodating such growth, the Council is concerned that the route of the cable corridor could constrain the potential to do so. Most notably, the Council is concerned about the proximity of the corridor to the west, near to Abbotsham Cross Roundabout and to the South of East-the-Water.</p>	<p>Torrington District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>Volume 1, Chapter 4: Need and Alternatives of the ES (Document Ref: 6.1.4) explains how the draft Onshore HVDC Cable Corridor evolved to avoid Local Plan allocated sites in Abbotsham and feedback from Devon County Council Highways' concerns about possible future need to expand the Abbotsham Cross roundabout. The Onshore Infrastructure Area avoids all other allocated sites and lies beyond existing settlement boundaries.</p> <p>The assessment of cumulative effects has been guided by a database (long list) of planning applications and relevant policies, and which was the subject of Statutory Consultation. The long list is contained in Volume 1, Appendix 5.3: Cumulative Effects Assessment Screening Matrix of the ES (Document Ref: 6.1.5.3)</p> <p>The Applicant submits that where no local plan allocations or planning applications have been brought forward, the Applicant has limited options to address potential conflicts with proposed future development.</p> <p>The Applicant has committed to ongoing engagement with local stakeholders throughout the process and manage any potential conflicts as they arise.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Cumulative impacts	Specifically in relation to Abbotsham Cross Roundabout, the Council notes from the Land Use Plans (Sheet 6) that there is an intention to acquire permanent rights for a strip of land that extends along the road frontage to the south of the A39, a small section to the south and west of Clovelly Road and to the west of the highway heading south towards High Park Farm. There is concern that this could in effect sterilise any future potential opportunities for future built development in this location, in particular precluding the provision of an appropriate highway access to the site. Similarly, there are concerns of the relative proximity of the cable corridor in this location, being only approximately 300-400m to the west of the roundabout and the extent of the currently planned built form of the town. Given the area's relationship to the existing and proposed built form, this is a location that could conceivably, and without prejudice, be in a location that could be logically reviewed to accommodate future growth.	Torrige District Council	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Applicant has updated the Land Plans (Document Ref: 2.2) since the PEIR. The Applicant has no intention to acquire land with permanent rights in this area (with the exception of the cable easement) i.e. on the southern side of the Clovelly Road roundabout at Abbotsham Cross. The area in question is proposed for temporary construction access only with no permanent access rights proposed.</p> <p>The Applicant submits that where no local plan allocations or planning applications have been brought forward, the Applicant has limited options to address potential conflicts with proposed future development.</p> <p>The Applicant has committed to ongoing engagement with local stakeholders throughout the process and manage any potential conflicts as they arise.</p>	N
Cumulative impacts	Similarly, the proximity of the cable corridor proposed to run to the south of the existing and planned built form to the south of East-the-Water, raises concerns about the potential scope to accommodate future strategic growth of the town in this location; with the corridor being less than 200m to the south of the land currently allocated for planned housing growth. As per the land near to Abbotsham Cross Roundabout, this could conceivably be, without prejudice, a location that could be logically reviewed to accommodate future growth.	Torrige District Council	<p>Anticipated urban expansion of East-the-Water is reflected in local plan site allocation BID04. This site is included within the database of cumulative developments in Volume 1, Appendix 5.3: Cumulative Effects Assessment Screening Matrix of the ES (Document Ref: 6.1.5.3) and captured by relevant cumulative assessments across the ES chapters.</p> <p>It has not been possible to forecast any possible future urban expansion beyond the allocation of BID04.</p>	N

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Minerals				
Mineral resources	<p>The Minerals Planning Authority notes that the impacts of the proposed development on mineral resources will not be included in the Environmental Statement, given that the proposal is not located within any mineral safeguarding or consultation areas.</p> <p>The Minerals Planning Authority also notes that the application will consider the reuse of material between the different elements of the project and the quantities of material to be used as part of the construction planning. This is supported, and it is advised this takes place during the design stage, rather than construction planning to avoid missed opportunities.</p> <p>It is also noted that the Environmental Statement should include a description of the nature and quantity of materials and natural resources to be used.</p>	Devon County Council	<p>This is noted and has been addressed in the ES.</p> <p>An assessment of natural resources including minerals is included in Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions (Document Ref: 6.2.4). The Outline On-CEMP (Document Ref: 7.7) includes an Outline Site Resource and Waste Management Plan.</p> <p>It has not been possible at this stage to confirm the quantities of resources but the Site Resource and Waste Management Plan(s) would be updated during the detailed design process and would be maintained during the construction process to record the movement of waste from the construction areas.</p>	N
Minerals	<p>The Minerals Planning Authority cannot find any reference of materials management, the details of the main types and quantities of material required, or any requirement for the sourcing of materials to be done in an environmentally responsible way in Volume 1, Appendix 3.2: Outline Onshore Construction Environmental Management Plan.</p>	Devon County Council	<p>This is noted and has been addressed in the DCO Application.</p> <p>An Outline Site Resource and Waste Management Plan is included in the Outline On-CEMP (Document Ref:7.7) and sets out the approach to manage any potential site resources, including materials management.</p> <p>The Proposed Development will be constructed in an environmentally sensitive manner and will meet the requirements of all relevant legislation, codes of practice and standards as identified in the DCO, ES and any updates to legislation or standards adopted at the time of construction, to limit the adverse impacts on the local community and environment as far as reasonably practicable.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
On-CEMP	<p>Based on the information provided, it is recommended that the Outline Onshore CEMP is updated to include reference to:</p> <p>Ensure the reuse of materials is prioritised (mobile crushers and screeners could be used), followed by the use of secondary or recycled aggregates; followed by the use of imported primary aggregates. The use of locally sourced aggregates of any type should be promoted;</p> <p>How the construction follows this hierarchy and, if not, why not; and</p> <p>Quantities of each type of aggregate used.</p>	Devon County Council	<p>This is noted and has been addressed in the DCO Application.</p> <p>An Outline Site Resource and Waste Management Plan is included Outline On-CEMP (Document Ref: 7.7) and sets out the waste management approach, including opportunities for reuse of materials as per the waste hierarchy.</p> <p>A final Site Resource and Waste Management Plan would be developed in accordance with the Outline Site Resource and Waste Management Plan that will be the subject of consultation and approval by Torridge District Council.</p> <p>It has not been possible at this stage to confirm the quantities of resources but the Site Resource and Waste Management Plan(s) would be updated during the detailed design process and would be maintained during the construction process to record the movement of waste from the construction areas.</p>	N
Noise and vibration				
Noise and vibration	<p>Volume 2 Chapter 6 Noise and Vibration outlines a significant number of noise generating activities both during the construction and operational phases. Whilst some data has been provided on noise impact, it is noted that the layout and location of plant and equipment has not yet been finalised. Initial concern is raised with the amount of high level noise activity, such as HDD and trenching works, that may possibly occur during noise sensitive time periods (i.e.. night time). Table 6.22 outlines mitigation measures however, several of the measures are to be secured through planning conditions. Whilst it is acknowledged that noise limits, time restrictions and a suitable Construction Environmental Management Plan (CEMP) can be conditioned within the planning consent, there needs to be reliance on robust noise assessments being available to ensure appropriate noise limiting conditions for example.</p>	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6) considers impacts and mitigations relating to the construction, operation and decommissioning phases of the Proposed Development.</p> <p>An assessment of noise generated during the construction phase of the Proposed Development has been carried out. This assessment has found that noise associated with the construction phase are expected to generate significant adverse effects at only two receptors due to HDD works, and one receptor due to construction-led traffic. The noise assessment has been carried out based on reasonable worst case assumptions regarding the locations of the equipment, and with all equipment in each phase of works operating simultaneously. Where significant effects have been identified, noise mitigation measures have been suggested and these will be finalised during detailed design.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
	<p>The operational substation suggests a very slight exceedance of noise levels over background at neighbouring dwellings. Despite the low levels, the proposed development should avoid any potential background 'creep' in the locality. Para 6.15 mentions that further baseline surveys will be undertaken to quantify the noise climate on neighbouring amenity. The Environmental Protection Team will require further surveys to be conducted, that accurately evaluate the noise impact, once layout and plant strategy have been finalised. The methodology referenced in the PEIR, in particular BS4142 and BS5228, is relevant.</p>		<p>An operational noise assessment has been carried out in accordance with the methodology set out in BS4142, based on an updated layout of the Proposed Development. The assessment has found that with appropriate mitigation measures in place, operational noise levels will not exceed the existing background sound levels at nearby receptors.</p> <p>A cumulative operational noise assessment has been carried out, taking into account noise from the proposed Converter Site, the existing Alverdiscott substation, and nearby proposed developments. This has identified that only a +1 dB exceedance of background sound levels is expected at the nearest and most affected receptor (Webbery Barton). Other receptors, which are located further away are expected to experience noise levels below the background sound level. Therefore, it is considered that the influence of the proposed Converter Site on potential background creep has been adequately considered and controlled and should not be a material issue in determining the scheme.</p> <p>It is noted that additional noise surveys have been requested by the LPA. These will be carried out at a later design stage, when details of finalised site layouts are available for the operational and construction works, to ensure noise surveys are appropriately planned.</p>	

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Socio-economics and tourism				
Socio-economics	<p>The County Council requests that consideration be given to assessing the potential impacts of the routing of any cables and associated easements upon any new schools or extensions to existing schools which may come forward in the future.</p> <p>It is noted that changes have been made to the cabling to avoid Abbotsham St Helen's Primary School and we would wish to seek assurance that no such cabling will run through, or adjacent too, other existing or new school sites in the area. New school sites are identified in the North Devon and Torridge Local Plan 2011-2031 at South of East-the-Water (Policy BID04), Bideford West Urban Extension (which current has 2 options) (BID01) and Daddon Hill Farm Northam (NOR01), the location of these sites are shown at Appendix 1 to this response.</p>	Devon County Council	<p>This is noted and has been addressed in the ES.</p> <p>The potential new school sites identified by Devon County Council have been included in the CEA longlist and the relevant chapters of the Environmental Statement have incorporated an assessment of potential impacts to these sites accordingly. This was confirmed to Devon County Council during weekly meetings in October 2024.</p> <p>No new schools or extensions to existing schools which may be impacted by the Proposed Development have been identified.</p> <p>The assessment of construction effects on schools and other receptors is provided Volume 4, Chapter 4: Human Health of the ES (Document Ref: 6.4.4), section 4.10 'Transport modes, access and connections'.</p> <p>In terms of cumulative effects, the Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5) has not identified any new schools or extensions to existing schools within its cumulative assessment.</p>	N
Socio-economics	<p>It is also noted that the construction access runs near to East -The-Water Primary School but not directly alongside it, however, it does run adjacent to Marland Special School (Broomhayes Site) on Alverdiscott Road. DCC would want to ensure that all local schools impacted by the works are made fully aware of the proposals. As a Special School, noise from construction access could be an issue at Marland and early engagement with the school is recommended</p>	Devon County Council	<p>The cable route will be within the cable corridor that is proposed, which avoids the existing schools.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Socio-economics	The Council broadly agrees with the thrust of the socio-economic analysis of impacts in the PEIR, but wishes for clarification as to whether the final gross value added (GVA) and jobs impact figures include all potential socio-economic impacts on tourism. In particular the impacts of construction traffic and other construction activity including noise, on for example day visitors, regular visitors, visitors to the Tarka Trail and tourist related business, and whether these factors have been considered in the final overall impact analysis. In addition, the Council would also like clarification as to whether these total figures include potential impacts on agricultural production and fisheries from the proposal.	Devon County Council	This is noted and has been addressed in the ES. The impacts on Gross Value Added (GVA) and employment include indirect and supply chain impacts, and are considered in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3). The methodology considered potential adverse effects on the tourism economy, however the assessment has found these to be negligible. These are summarised in Table 3.37, Table 3.38, Table 3.39, Table 3.49, and Table 3.50 of the ES chapter.	N
Socio-economics	The Council would like to question the figures provided for visitor accommodation given that the numbers of properties listed in North Devon and Torridge on Airbnb and Vrbo are well in excess of the non-serviced accommodation figures used in the study's assumptions.	Devon County Council	This is noted and has been addressed in the DCO Application. The Applicant has prepared an Outline Accommodation Strategy (Document Ref: 7.13) to support the DCO application and has liaised with Devon County Council as part of this on data for visitor accommodation. An assessment of accommodation sources is included in this document and figures have been updated since the PEIR.	N
Socio-economics	The Council would like it noted that whilst the title of Section 3.14 of Volume 4, Chapter 3 reads "Summary of Impacts, Mitigation Measures and Monitoring" there does not appear to be any mention of mitigation measures and monitoring following Table 3.57. It is essential that the Council establishes early on what is being proposed in terms of socio-economic mitigation so the measures can be effectively monitored.	Devon County Council	This is noted and has been addressed in the ES. In Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3), mitigation measures adopted as part of the Proposed Development are covered in Section 3.8. This summary includes cross-references to additional ES chapters which contain additional information regarding potential impacts, mitigation measures and monitoring.	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Socio-economics	<p>Paragraph 3.46 – 3.4.13 (Study Area)</p> <p>Could this be clarified, please? It seems to indicate that consideration is only being given to tourism receptors (not the most accessible of terms) within 10km. Yet when discussion takes place around negative impact on tourism accommodation within the region, including that accommodation being used for Xlinks purposes rather than tourists, much of that will inevitably take place in areas such as Appledore, Westward Ho! and Barnstaple- beyond that 10km radius.</p>	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>'Receptor', a term used throughout the Environmental Statement, is a standard term used for EIA purposes, and is considered to be useful for its ability to encompass a wide range of subjects. While individual people are receptors in various capacities, so are groups of people, environmental attributes and non-human populations.</p> <p>Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) outlines details of the study area in Section 3.4. All onshore tourism and recreation receptors considered in the assessment are located within 10 km of the Converter Site. This was considered the most suitable size of study area to focus the study on receptors likely to experience significant environmental effects, as identified in other chapters.</p> <p>Different study areas are used in other parts of the assessment such as regional wealth generation and the home location of workers.</p> <p>Further justification for the choice of a 10km study area for tourism receptors is provided in the updated ES chapter.</p>	N
Socio-economics	<p>Table 3.6: Definition of magnitude for economic impacts</p> <p>Focus: 1% GVA impact = high</p> <p>This is quite clever economics but could also be seen as being reasonably unambitious - what is the industry standard is on this.</p>	Torrige District Council	<p>The Applicant submits that there is no standard measure for what is considered of high magnitude for economic impacts.</p> <p>The 1% figure has been used because it is the equivalent of the medium-term annual growth level in the UK. Between 2000 and 2019, the average level of Gross Domestic Product (GDP) per capita growth in the UK was 1% per annum (IMF, 2022). Similarly, between 2000 and 2019 the number of jobs has grown by 1% per annum (ONS, 2022). The magnitude of any change in an economy should be considered within this context. Further information is presented in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Socio-economics	<p>Paragraph 3.4.75-3.4.79 (Assumptions and Limitations of the Assessment)</p> <p>A real concern that all of this information is based on partial data / other examples and not accurate projections of the full XLinks cost. Although that is understandable it would be useful to know in more detail what these other projects (general industry data) related to as this is very much not a common case with direct comparators. Slightly mitigated by 3.8.8 - 3.8.11 but pinch of salt required nonetheless given the geographical situation and challenges.</p>	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>An additional discussion of construction expenditure, and the methodology used to estimate it, is provided in Section 3.10 of Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p>	N
Socio-economics	<p>Paragraph 3.5.14 (Industrial Structure)</p> <p>This seems inaccurate. Both 13.3% and 12.5% are lower than 13.9% - 13.3% (UK Average) is NOT higher.</p>	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>This typographical error has been amended in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3), in Section 3.7.14.</p>	N
Socio-economics	<p>Paragraph 3.5.25</p> <p>The key indicator is actually the ratio average earnings: house price, the figure itself of average house price does not necessarily demonstrate much.</p>	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) now includes reference to affordability ratios in Table 3.27.</p> <p>The ratio of local median house prices to both local median gross annual earnings and to workplace earnings were assessed to be higher than the UK average as of 2023.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Socio-economics	<p>Paragraph 3.5.27-3.5.2.9</p> <p>The value of tourism across Torridge and North Devon varies wildly. The value in Torridge is less than the value in Morteheo, for example. We have visitor value data up to 2022. Use of 2019 as a baseline figure is slightly risky as it does not necessarily correlate to tourism value or trends in 2024 following so many upheavals in the sector during the intervening period. An argument can be seen where negative impact figures are presented against the overall size of the tourism industry and seen as being quite low- but would figures for Woolacombe / Saunton etc be relevant (just as would Westward Ho! be relevant for White Cross?). This is again the case for 3.5.34</p>	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>The use of statistics for the purposes of Environmental Impact Assessment is partially determined by the availability of relevant data.</p> <p>The baseline and assessment contained in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) has been updated to include data from 2022 taken from Devon County Council/South West Research Groups study “The Economic Impact of Devon’s Visitor Economy 2022: Devon and Districts”.</p> <p>No impacts on individual assets have been identified as significant, therefore impacts on particular areas within the Local Area would also be assessed as not significant.</p>	N
Socio-economics	<p>Table 3.28: Local Area, Top Visitor Attractions</p> <p>This is a questionable list. No Milky Way but "Church of St Margaret of Antioch" included. Also, no Hartland, nor any of the North Devon attractions. RND Golf Club?</p>	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>An updated list of local attractions is provided in Table 3.30 of Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3). The table has been updated since the publication of the PEIR, and now includes some of the additional local attractions mentioned, for example the Milky Way Adventure Park.</p> <p>34 attractions were identified in the Local Area based on a review of the Visit Devon website and attractions listed on the VisitBritain website (VisitBritain, 2024).</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Socio-economics</p>	<p>Table 3.32: Maximum design scenario considered for the assessment of potential impacts</p> <p>Has any form of "meet the buyer" event been discussed?</p> <p>There are a lot of hidden, incredibly high-quality businesses who might surprise. For example, TCi in Barnstaple was a Tier 1 at Hinckley C yet could easily be overlooked simply for lack of awareness, likewise local cable laying and repair business who work on international interconnectors already but don't have local visibility. This should be an early priority to enable ramping up of capabilities in line with work already being undertaken for Celtic Sea FLOW preparations, with the 2 skillsets closely aligning enabling shared benefits rather than competition for workforce</p>	<p>Torrige District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>As outlined in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) the assessment is based on conservative estimates of local content, in line with the worst case scenario approach in an EIA.</p> <p>The relevant contractors for the construction phase of the Proposed Development would be reasonably expected to undertake 'meet the buyer' events prior to the commencement of construction as part of normal practise.</p> <p>The Applicant has developed an Outline Skills and Employment Strategy (Document Ref: 7.23) to support the DCO application. It is noted that the strategy is an initial outline and will be further developed in consultation with Councils as further details become available from the Contractors. Skills and Employment Plans will be developed prior to the commencement of construction in accordance with the Outline Skills and Employment Strategy (Document Ref: 7.23).</p> <p>For the purposes of the socio-economic assessment a conservative assumption of local content has been maintained.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Socio-economics	<p>Paragraph 3.7.8</p> <p>This is welcomed - but we would hope this could be done in coordination with Petroc and TDC Economic Development team to also align with future FLOW skills' needs, for example.</p>	Torridge District Council	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Applicant has developed an Outline Skills and Employment Strategy (Document Ref: 7.23) to support the DCO application. It is noted that the strategy is an initial outline and will be further developed in consultation with Councils as further details become available from the Contractors. Skills and Employment Plans will be developed prior to the commencement of construction in accordance with the Outline Skills and Employment Strategy (Document Ref: 7.23).</p> <p>The Applicant has previously engaged with Petroc and will continue to engage with educational facilities throughout the development and construction phases of the project to identify opportunities to support employment opportunities.</p>	N
Socio-economics	<p>Paragraph 3.8.15</p> <p>The example of EDF at Hinkley Point C is a good one to follow. They committed to a far greater proportion of local spend than this and invested in local supply chain development during project gestation with a commitment to leaving a real local legacy. The Council calls upon XLinks to engage with Hinkley C and understand those processes as well as the benefits and ultimate cost-savings which have been achieved as a result.</p>	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>As outlined in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) the assessment is based on conservative estimates of local content, in line with the worst case scenario approach in an EIA.</p> <p>The Applicant has developed an Outline Skills and Employment Strategy (Document Ref 7.23) to support the DCO application. It is noted that the strategy is an initial outline and will be further developed in consultation with Councils as further details become available from the Contractors. Skills and Employment Plans will be developed prior to the commencement of construction in accordance with the Outline Skills and Employment Strategy (Document Ref: 7.23).</p>	N
Socio-economics	<p>Paragraph 3.8.18</p> <p>Which section is the 371km referring to? The whole length is considerably more than that.</p>	Torridge District Council	<p>The figure of 371km refers to the portion of the offshore cable route located within the UK's exclusive economic zone (EEZ).</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Socio-economics	<p>Paragraph 3.8.22</p> <p>The Council, and DLUHC, would very much challenge that this statement is correct for Torridge, hence the highlighting of the current challenge of the Levelling Up Partnership award. This is the danger of simply looking at North Devon and Torridge, where Torridge is the direct local area.</p>	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>The Local Area has been defined as the two Local Authorities of North Devon and Torridge because the Order limits include parts of both local authorities and because of the proximity to key population centres in North Devon, namely Barnstaple.</p>	N
Socio-economics	<p>Paragraph 3.8.27-29</p> <p>Very disappointing, hence the need for early supply chain development locally – re: employment figures.</p>	Torridge District Council	<p>This is noted and has been addressed in the ES.</p> <p>As outlined in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) the assessment is based on conservative estimates of local content, in line with the worst case scenario approach in an EIA.</p> <p>The Applicant has developed an Outline Skills and Employment Strategy (Document Ref 7.23) to support the DCO application. It is noted that the strategy is an initial outline and will be further developed in consultation with Councils as further details become available from the Contractors. Skills and Employment Plans will be developed prior to the commencement of construction in accordance with the Outline Skills and Employment Strategy (Document Ref: 7.23).</p> <p>The reason for the reduction in peak employment levels compared with the PEIR is that the distribution of the workforce is now based on activity rather than payment schedules. This has smoothed out the level of onsite activity and reduced the peak level of employment.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Socio-economics</p>	<p>Paragraph 3.8.59 – Out of area workforce impact on accommodation</p> <p>Similar to earlier points this links to minimising out-of-area procurement where possible and developing the local supply chain early in this process.</p>	<p>Torrige District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>As outlined in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) the assessment is based on conservative estimates of local content, in line with the worst case scenario approach in an EIA.</p> <p>The Applicant has developed an Outline Skills and Employment Strategy (Document Ref 7.23) to support the DCO application. It is noted that the strategy is an initial outline and will be further developed in consultation with Councils as further details become available from the Contractors. Skills and Employment Plans will be developed prior to the commencement of construction in accordance with the Outline Skills and Employment Strategy (Document Ref: 7.23).</p> <p>The Applicant has also developed an Outline Accommodation Strategy (Document Ref: 7.13) which outlines the various accommodation options available. The strategy identifies options that have been effectively used on other projects would reasonably reduce impacts of out of area workforce on tourism accommodation particularly.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Socio-economics	<p>Paragraph 3.8.61</p> <p>This proportion is simply not acceptable and seems to indicate a complete lack of engagement with local suppliers and workforce.</p>	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>The methodology used to calculate potential workforce numbers in the Socio-Economic chapter (Volume 4, Chapter 3: Socio-economics and Tourism (Document Ref: 6.4.3) has been updated following PEIR to a construction activity based assessment (as opposed to determining workforce based on capital expenditure). This has resulted in a significant reduction of the anticipated workforce numbers (and hence out of area workers) as assessed in the chapter. The assumptions for local content are conservative, in line with the worst-case scenario approach of an EIA.</p> <p>The Applicant has developed an Outline Skills and Employment Strategy (Document Ref 7.23) to support the DCO application. It is noted that the strategy is an initial outline and will be further developed in consultation with Councils as further details become available from the Contractors. Skills and Employment Plans will be developed prior to the commencement of construction in accordance with the Outline Skills and Employment Strategy (Document Ref: 7.23).</p>	N
Socio-economics	<p>Paragraph 3.8.68</p> <p>This could be hugely damaging to the local sector. Many of these businesses shut to recuperate during winter months when supposed balancing impacts could be achieved.</p>	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>A revised, equivalent figure of £0.7 million – 75% lower – is outlined and discussed in Section 3.10 of Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p> <p>The Outline Accommodation Strategy (Document Ref: 7.13) indicates that the majority of the out of area construction workforce can be accommodated through other means than tourist accommodation and that, if required, the use of tourist accommodation would account for between 0.5-1.0% of available supply within Torrige and North Devon.</p> <p>As such, the tourism related impacts assessed in the Environmental Assessment are substantially reduced since the PEIR assessment.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Socio-economics	<p>Paragraph 3.8.69-3.8.70 - Magnitude on tourism = Low</p> <p>The Council would significantly challenge this logic. These are small, independent businesses who live on tight margins. The negative impact indicated would potentially not only impact on a short term but also longer term. For example, families who always come here deciding to holiday elsewhere. Shops closed and becoming vacant, or hospitality options lost. All with local psychology and place momentum impacts</p>	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>Between 2019 and 2022 the level of expenditure in the tourism economy in the Local Area increased by £87 million The majority of this increase was associated with day visitor spending, which is not reliant on accommodation provision. The analysis estimated that there could be a reduction in turnover of up to £0.7 million which has been assessed as Low because it is equivalent to between 0.5% and 0.25% of the value of the sector in the Local Area. This is also equivalent to less than 1% of the increase in turnover that has occurred in this time period in the sector. Further information is presented in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p>	N
Socio-economics	<p>Paragraph 3.8.74 – Impact on house prices</p> <p>This is another major concern. The house price to average earnings ratio is already hugely challenging for the local workforce.</p>	Torrige District Council	<p>This is noted. The use of statistics for the purposes of Environmental Impact Assessment is partially determined by the availability of relevant data.</p> <p>Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) now includes reference to affordability ratios in Table 3.27.</p> <p>The ratio of local median house prices to both local median gross annual earnings and to workplace earnings were assessed to be higher than the UK average as of 2023.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Socio-economics</p>	<p>Paragraph 3.9.13</p> <p>As per the earlier points above, the Council would significantly challenge this assertion. The lack of local construction workers, requiring significant use of local tourism accommodation and its detrimental impact on the wider economy, including retail and hospitality, undoubtedly requires mitigation. The clearest mitigation is therefore early investment in developing a local supply chain to overcome this issue whilst also increasing social value impacts</p>	<p>Torridge District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>As discussed in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3), the construction phase of the Proposed Development is expected to have a negligible beneficial impact on the local economy.</p> <p>The Outline Accommodation Strategy (Document Ref: 7.13) indicates that the majority of the out of area construction workforce can be accommodated through other means than tourist accommodation and that, if required, the use of tourist accommodation would account for between 0.5-1.0% of available supply within Torridge and North Devon. As such, the tourism related impacts assessed in the Environmental Assessment are substantially reduced since the PEIR assessment.</p> <p>The Applicant has developed an Outline Skills and Employment Strategy (Document Ref 7.23) to support the DCO application. It is noted that the strategy is an initial outline and will be further developed in consultation with Councils as further details become available from the Contractors. Skills and Employment Plans will be developed prior to the commencement of construction in accordance with the Outline Skills and Employment Strategy (Document Ref: 7.23).</p> <p>The Applicant is committed to working with Council and local businesses to provide opportunities to the local supply chain.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Socio-economics	<p>Paragraph 3.11.21</p> <p>Interesting that this GVA impact of offshore wind is picked up on in this report as it is not so clear where the XLinks GVA impact would actually come from for the Local Area given the limited spend and employment opportunities, especially during the construction phase, which also puts other local jobs at risk, as indicated by the impacts on tourism and connected spend.</p>	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>The economic impact, including the impact on GVA in the local area in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p> <p>Table 3.36 summarises the level of contract share within the Local Area. These are conservative estimates in line with the guidance on assessing the worst case scenario within an EIA. The local content will include elements of the primary civil engineering works which are procured locally and support services to this construction, such as plant hire and the provision of other materials which are typically procured locally for civil engineering projects.</p>	N
Socio-economics	<p>Other comments:</p> <p>The use of a 10k radius vs data and stats from Torrige and North Devon feels a strange balance.</p>	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>The use of a 10km study is to identify individual assets that may experience other environmental effects as a result of the Proposed Development. This would include impacts identified in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2), which uses a radius of 10km.</p> <p>The effects on the accommodation market and wider tourism economy are assessed across the Local Area in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) because the workforce could be accommodated beyond the 10km boundary.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Socio-economics	3.5.23 & Table 3.26 – Would suggest that the current baseline metrics are inadequate. To understand the affordability of housing, it is important to not only look at house prices but to look at the interplay between household income and house prices. This provides a more valuable insight into affordability that reflects local circumstances. Equally, it is not only appropriate to look at average income and house prices, but rather also the relationship between lower quartile incomes and house prices. Would suggest that the ONS House price to workplace-based earnings ratios are utilised to provide more appropriate and effective metrics. For the private rented sector, an understanding can be obtained by analysing rental costs, which again could be appraised against incomes – see ONS Average private rent price and annual inflation, local authorities in England and Wales. The availability of housing is also problematic for northern Devon, particularly within the Private Rented Sector and this should be considered directly.	Torridge District Council	This is noted and has been addressed in the ES. Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) now includes reference to affordability ratios in Table 3.27. Section 3 of the Outline Accommodation Strategy (Document Ref: 7.13) provides an assessment of the labour market profile. The Strategy also includes an assessment of incomes, house prices and rents as well as considering issues of housing availability.	N
Socio-economics	3.5.27 – Given that the assessment of impact is benchmarked against the overall level of GVA, would suggest that the value of tourism should be considered against a more localised geography, as it is unlikely to currently identify localised adverse impacts which could be more pronounced given the nature of both the project and the local tourism economy.	Torridge District Council	This is noted and has been addressed in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3). The tourism economy in the Local Area is identified as a key receptor in Table 3.34. Impacts on the tourism economy during construction of the Proposed Development are considered in Section 3.10. No impacts on individual assets have been identified as significant, therefore impacts on particular areas within the Local Area would also be assessed as not significant in EIA terms.	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Socio-economics	Paragraph 3.5.35 – Walking and Cycling Routes - Whilst the list of walking and cycling routes is reasonable, it does not take account of the wider network of Public Rights of Way (PROW) that can be found across the Local Area and which can be utilised in combination with some of the other more strategic routes such as the South West Coast Path to make more bespoke opportunities. This is particularly the case for routes in and around Cornborough and Abbotsham Cliffs, near to the landfall of the proposed cable route.	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8) includes plans to manage any potential disruptions to recreational routes, including the Outline PROW Management Plan (Document Ref: 7.11) to be submitted as part of the DCO application.</p> <p>The Applicant appreciates Torrige District Council's recognition of the importance of the Public Rights of Way (PROW) network, particularly the Tarka Trail and South West Coast Path, as both recreational and economic assets.</p> <p>In both cases, the proposed construction method includes drilling under the Trail and Path to minimise any disruption.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Socio-economics</p>	<p>Paragraphs 3.5.39 - 3.5.41 – Demographics – this is likely to provide an under representation of the likely growth in population over the specified period. The adopted North Devon and Torridge Local Plan 2011-2031 provides for a housing and economic growth strategy above the baseline demographic projections. Further, the levels of growth were established using earlier iterations of the ONS population and household projections, which tended to show higher levels of growth than those specified within the report. Whilst the adopted North Devon and Torridge Local Plan was only intended to plan for growth over the period up to 2031, it should be noted that much of the planned growth, particularly around Bideford and Northam, has proceeded to come forward later than anticipated and will likely continue to be built out well into the 2030s</p>	<p>Torridge District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) outlines the methodology used to define the study areas in section 3.4, including the assumptions and limitations which accompany this methodology.</p> <p>Data from official statistical sources, such as the surveys carried out by the Office for National Statistics (ONS), are generally published with a lag of between one and two years. This means that part of the information included in the baseline, while being based on the latest available data, does not necessarily reflect current expectations or activity. To provide the most up to date information possible, the baseline assessment was carried out close to the submission of this PEIR chapter and was updated ahead of submission of the Environmental Statement.</p> <p>Table 3.18 identifies the data sources used to collate information on socio-economics and tourism for the purposes of the ES chapter. 'Population Projections 2018-2043 - local authority based by single year of age' is an ONS dataset from 2020.</p> <p>The lower projections for population growth have been maintained because the magnitude of impacts driven by demographic change is measured against the demographic changes that would occur without the Proposed Development. Therefore, effects are more likely to be significant if more conservative assumptions on population projections are used.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Socio-economics</p>	<p>3.8.65 – Would suggest that the assumptions on proportions of spend are not reflective of the local context and that they contribute to underestimating the likely losses of spend. Evidence (The Economic Impact of the Torridge Visitor Economy 2022; The South West Research Company Ltd, December 2023) indicates that direct expenditure by category for Torridge is different to that cited – with 18% being spent on accommodation, 23% on shopping. 29% on Food and Drink, 11% on Attractions/ entertainment and 19% on travel. On this basis, the ‘recreational’ spend would amount to 63% of the overall spend, rather than the suggested 52%.</p>	<p>Torridge District Council</p>	<p>This is noted and has been addressed in Section 3.10 of Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p> <p>The proportion has been updated based on latest Devon County Council Economic Impact of the Devon Visitor Economy study (Devon County Council, 2024).</p>	<p>N</p>

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<p>Socio-economics</p>	<p>3.8.68 & Table 3.45 – Would suggest that the geography for the Local Area definition relating to tourism should be reduced, to better reflect the more focused likely geographical impact of the proposals – which are likely to be acute for a much smaller area, given that the displacement and use of tourism accommodation by workers is likely to be focussed to that close to the construction activity. The current approach to the analysis is therefore likely to downplay the potential impact on the tourism sector in the area close to the Onshore Infrastructure Area and associated construction activity. The incorporation of North Devon into these metrics is likely to disproportionately skew the assessment as that area has a far larger tourism sector in terms of quantity of accommodation, number of day trips, number of overnight stays (and nights), spend and employment. The identified displaced spend of £2.8m is a not insignificant sum when viewed in the more localised context of the proposal and where in reality, the workforce is likely to seek accommodation. Evidence (The Economic Impact of the Torridge Visitor Economy 2022; The South West Research Company Ltd, December 2023) indicates, for example, that the overall total visitor related spend for Torridge as a whole is c.£117.84m, which is significantly lower than that identified for the Local Area (£366.7m) within the report (Table 3.27). The potential wider loss of spend could also have a more localised impact on individual businesses and a more profound impact on associated tourism spend by visitors on services, facilities and attractions found in and around Bideford, Northam, Westward Ho! And Appledore and nearby rural settlements such as Abbotsham. Reflecting this more realistic geography would likely have a profound impact on the overall analysis and the significance of the effect.</p>	<p>Torridge District Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) outlines the methodology used to define the study areas in section 3.4. The assessment of possible effects on tourism is closely aligned with that of the assessments contained in Volume 4, Chapter 2; Landscape Seascape and Visual Effects of the ES (Document Ref: 6.4.2). In contrast, the assessment of potential effects on the accommodation market and wider tourism economy are assessed across the Local Area in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) because the workforce could be accommodated beyond the 10km boundary.</p> <p>No impacts on individual assets have been identified as significant in EIA terms, therefore impacts on particular areas within the Local Area would not be assessed as significant.</p> <p>The Outline Accommodation Strategy (Document Ref: 7.13) indicates that the majority of the out of area construction workforce can be accommodated through other means than tourist accommodation and that, if required, the use of tourist accommodation would account for between 0.5-1.0% of available supply within Torridge and North Devon.</p> <p>As such, the tourism related impacts assessed in the Environmental Assessment are substantially reduced since the PEIR assessment. For instance, rather than the figure of £2.8 million for displaced spend as referenced in the PEIR, a revised, equivalent figure of £0.7 million – 75% lower – is outlined and discussed in Section 3.10 of Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p> <p>The scale of transient workforce has been updated and is now based on anticipated on site activity, rather than an expenditure profile. As a result, the peaks of employment, and potential for</p>	<p>N</p>
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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
			displacement, are reasonably more accurate and have been reduced.	
Socio-economics	3.6.67 & 3.8.68 – the report suggests that the tourism industry in the local area is very seasonal. Whilst this maybe the case, there has been a trend to see an increase in year-round visits. Accordingly suggest that the assumption of the workforce displacing tourists during only the three months of summer (July, August and September) is likely to underestimate the likely impact. Evidence (The Economic Impact of the Torridge Visitor Economy 2022; The South West Research Company Ltd, December 2023) suggests that across Devon there are significant peaks in the number of nights of staying visits in April and also June.	Torridge District Council	This is noted and has been addressed in the ES. The data from the latest Devon County Council Economic Impact of the Devon Visitor Economy study (Devon County Council, 2024) has been used in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) and in the Outline Accommodation Strategy (Document Ref: 7.13). This shows accommodation provision is likely to have capacity to comfortably meet demand outside the peak months.	N
Socio-economics	3.8.70 and Table 3.46 – Tourism and Recreation – There appears to be a discrepancy between the conclusion on the significance of effect on tourism and recreation specified in the paragraph of text – Moderate (Adverse) and in the proceeding table – Minor (Adverse).	Torridge District Council	This is noted and has been addressed in the ES. The typographical error has been rectified in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3), Section 3.10.70 and Table 3.48.	N
Traffic and transport				
Mitigation	It is noted and welcomed that Paragraph 5.14.17 states that 'If an applicant suggests that the costs of meeting any obligations or requirements would make the proposal economically unviable this should not in itself justify the relaxation by the Secretary of State of any obligations or requirements needed to secure the mitigation.' We look forward to the detailed submission and detailed assessment of impacts which will clarify what mitigation is needed for the lengthy and vast construction project, which will see over 100 large vehicles and 400 staff added to the local road network each day.	Devon County Council	This is noted and has been addressed in the ES. The relevant potential traffic and transport impacts during the construction phase of the Proposed Development are considered in section 5.10 of Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5) while mitigation measures are set out in section 5.8 of the same chapter. The costs of transport mitigation currently envisaged by the Applicant will not make the Proposed Development economically unviable.	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Scope of assessments	<p>Paragraph 5.4.23 states that 'The IEMA rule 1 and rule 2 thresholds which delimit the extent of EIA do not on their own apply to the impact upon driver delay as this relates to junction/highway capacity and operation and the impact upon this is defined by the Transport Assessment (TA). Generally, a potential impact upon driver delay may result when the highway network is at or close to capacity and not just with reference to the rule 1 and rule 2 thresholds.' We look forward to receiving details of the scope for the TA through which the impact on driver delay (and other things) will be assessed and after which appropriate mitigation can be agreed.</p>	Devon County Council	<p>This is noted and has been addressed in the ES.</p> <p>Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5) contains an integrated Transport Assessment to consider the potential impacts and effects of the Proposed Development on the operation of the highway network, including driver delay, in accordance with relevant parts of the Department for Transport's (DfT) Transport Analysis Guidance (TAG) (DfT, 2023), guidance and best practice and engagement with Devon County Council.</p> <p>The effect of the construction phase of the Proposed Development upon driver delay are considered in Section 5.10, while mitigation measures are set out in Section 5.8. At no junction or crossing is the effect on driver delay expected to be a significant effect in EIA terms.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Non-motorised users	<p>Paragraph 5.5.13 states that 'The residential areas of Bideford, Northam, Appledore and Westward Ho! have commensurate walking and cycling infrastructure provision throughout, although no footways or cycleways exist in rural areas.' This does not mean that people in the 'rural areas', outside of the 'town proper' do not walk or cycle. The lack of paths means that the impact of additional traffic is likely to be felt more on these country roads where people walk and cycle on the road and will therefore likely result in these users finding it more challenging to use these roads. This too applies to construction staff whereby the lack of non-car infrastructure such as safe walking and cycling routes from the site compound to nearby facilities such as food outlets for lunch, will all potentially negatively impact on the volume of traffic in the area and limit the opportunities for walking and cycling. As a result all road links identified in the PEIR and other emerging documents, need to be assessed for increased conflict and in particular for safety over the many years of proposed construction. Additional conflict between motorised and non-motorised users will not only be a safety issue, but one that may result in people walking/cycling less.</p>	Devon County Council	<p>This is noted and has been addressed in the ES.</p> <p>Impacts on non-motorised user fear and intimidation are assessed at section 5.10 of Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5). In all assessed cases, the overall impact from construction is expected to be negligible.</p> <p>The construction staff would not generally have time to leave site at lunchtime and travel to nearby facilities such as food and drink outlets for lunch on a regular basis. The anticipated and most common practise will be for catering and welfare facilities to be provided at the main construction compounds to the north of Abbotsham Cross roundabout and at the Converter Stations.</p> <p>The ES chapter contains an integrated Transport Assessment to consider the potential impacts and effects of the Proposed Development on the operation of the highway network, including road safety, in accordance with relevant parts of the DfT's TAG, guidance and best practice and in accordance with a series of meetings with Devon County Council, as set out within this table.</p> <p>The assessment presented in the ES chapter considers the impact of the Proposed Development on highway safety, non-motorised user delay and non-motorised user amenity and fear and intimidation in Section 5.10.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Worker transport</p>	<p>Paragraph 5.8.7 states that 'All construction workers will travel to the construction compound at Gammaton Road before onward travel by minibus to other work fronts in the study area using Manteo Way/Barnstaple Street and the A39, then the A386 and the B3236, or further westbound along the A39. The proposed routeing of construction workers is shown in Volume 2, Figure 5.4.' Devon County Council would like to seek clarification of how the impact of 400 construction workers arriving at this location has been assessed. The impact of this additional traffic, likely to be at least 300 vehicles, if not more, will be substantial across a number of routes around Bideford, including but not limited to Alverdiscott Road which would put additional traffic past the main entrance to East-the-Water Primary School.</p>	<p>Devon County Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>For the assessment presented in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5), it is assumed that all construction staff would arrive from outside of the study area.</p> <p>While some construction staff may live within the study area, in keeping with the worst-case assessment scenario of an EIA, this approach ensures the maximum number of construction staff vehicle movements are assigned onto each highway link.</p> <p>The assessment has not assigned construction staff vehicle movements along Alverdiscott Road past the main entrance to East-the-Water Primary School and it is considered that the environmental effects on traffic and transport receptors along Alverdiscott Road would be of negligible adverse significance and not significant in EIA terms.</p> <p>All construction staff working at the Converter Site and the Onshore HVDC Cable Corridor to the east of the River Torridge would travel to the main construction compound using the A39, Barnstaple Street, Manteo Way and then Gammaton Road.</p> <p>All construction staff working at the Onshore HVDC Cable Corridor to the west of the River Torridge would travel to the temporary construction compound using the A39 then the unnamed road to Abbotsham, before onward travel by minibus to other work fronts in the Onshore Infrastructure Area.</p>	<p>N</p>

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<p>Compound access</p>	<p>No information has been supplied to show how the Gammaton Road construction compound was selected as the best location for staff to access for onward minibus travel and it is uncertain if there are more appropriate and lower impact locations for this initial collection point. For example, and to be read in conjunction with details below, another site may be accessible by public transport and, therefore, the volume of vehicles attracted to the site would be lower, and the impacts on local roads therefore lower. As such, a variety of alternative locations for staff assembly should also be considered and assessed in detail prior to site selection.</p>	<p>Devon County Council</p>	<p>The Applicant notes that reasons for the selection of the Gammaton Road construction compound included:</p> <ul style="list-style-type: none"> • Requirement for a suitably sized site near the Converter Site to: <ul style="list-style-type: none"> ○ minimise the need for storage, vehicle parking and worker facilities at the Converter Site, thereby minimising the overall size of the Converter Site. ○ minimise the distance HGV and AILs need to travel between a main compound and the Converter Site. ○ Connection to the onshore HVDC cable corridor to facilitate connection to the haul road, removing the need for HGVs and AILs to use local country lanes to access the Converter Site. ○ The size of the site facilitates the establishment of appropriate mitigation measures on the boundary of the site to minimise potential noise and visual impacts associated with the temporary compound. ○ Close proximity to a main road to minimise the distance travelled by HGV and AIL on narrow country lanes. ○ Small number of residential properties located within close proximity to the proposed site. ○ Support of use by the landowner, mitigating the need to use CPO powers for the use of the land. <p>The Applicant considered other field areas on the eastern side of River Torridge, connected to the onshore HVDC cable corridor but notes that these areas would have still required access via Manteo Way, and would require HGV access down Tennacott Lane. Compounds in these areas would also be closer to a larger number of residential properties, particularly the new housing development proposed south off Hillcrest Road (accessed via Gammaton Road).</p> <p>The Applicant is not aware of other suitably sized sites that meet the requirements for the main construction compound and are</p>	<p>N</p>
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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
			located within close proximity to public transport and note that during discussions with Council no other potential sites were forthcoming which may be suitably close to public transport links.	
Minibuses	Opportunities should be considered to use the minibuses outside of peak construction traffic time to provide enhanced local public transport services as East-the-Water has limited bus services, and none currently serve this proposed site. Additionally, public transport should be provided to this location (or other agreed staff assembly point) to reduce the need for travel by private vehicle.	Devon County Council	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Applicant has considered the use of minibuses outside of peak construction traffic times following this suggestion being raised during meetings with Council. The Applicant respectfully submits that the requirements for use of the minibuses by the Applicant would not facilitate a reliable service for the community nor the contractor.</p> <p>The Applicant submits that it is not responsible for providing a public transport service as part of the Proposed Development and that is a service better suited to the Council.</p> <p>The Applicant does agree that where appropriate and reasonable, it is expected that movement by sustainable modes of transport will be facilitated and encouraged during the construction phase of the Proposed Development.</p> <p>An Outline CTMP (Document Ref: 7.12), includes demand management measures during the construction phase of the Proposed Development such as encouraging car sharing between construction staff.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Sustainable transport	Improvements to walking and cycling facilities should be provided to ensure that staff accessing the compound have a real choice to travel to the site by non-car modes. This would reduce the volume of traffic on local roads, and is also an economic/social consideration as otherwise, without travel choices, places a greater emphasis on car ownership as a requirement to work at the site. To this end, and considering the previous comments received from PINS, the development should consider delivery of measures within the Barnstaple with Bideford and Northam LCWIP (https://www.devon.cc/bbnlcwip).	Devon County Council	<p>This is noted and has been addressed in the ES.</p> <p>Section 5.7 of Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5) considers existing sustainable transport provision.</p> <p>The Applicant will review pedestrian and cyclist access to the Gammaton Road compound as part of the detailed design of the proposed highway works on Gammaton Road in consultation with Council and local residents on Gammaton Road (noting Council will be the approval authority as the local highway authority).</p> <p>Where appropriate, it is expected that movement by sustainable modes of transport will be facilitated and encouraged during the construction phase of the Proposed Development.</p> <p>An Outline CTMP (Document Ref: 7.12) includes demand management measures during the construction phase of the Proposed Development such as encouraging car sharing between construction staff.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Transport assessment</p>	<p>We would like to clarify that paragraph 5.8.27, page 45, which relates to the magnitude of impact on the Barnstaple Road/Manteo Way Junction, attributes the following quote to DCC:</p> <p>'Given this extremely minimal increase as a result of the proposed development, it is clear that the capacity issue at this junction during the peak AM and PM times is as a result of previous developments. It is not the responsibility of the development now proposed to mitigate the issues that have been caused by other developments. Further, the expected increase of 10 two-way traffic movements, compared with a 2022 5 day average of 317 movements in the peak AM and 464 in the peak PM, is not considered to be a significant increase. Accordingly, it is your Officer's view that the requested contribution is not necessary to make the development acceptable in planning terms'.</p> <p>The Council would like to clarify that this is a quote by Torridge District Council as the Local Planning Authority from the committee report relating to application reference 1/1141/2022/LA, and not Devon County Council as Local Highways Authority. Devon County Council maintains the view that 10 movements at this junction is significant at existing peak times. Improvements to the B3233/ Manteo Way to increase capacity and safety are outlined in DCC's Transport Infrastructure Plan.</p>	<p>Devon County Council</p>	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Applicant has discussed the source of this quote with Devon County Council and confirms it is now aware that it is attributable to an officer at Torridge District Council and not Devon County Council.</p> <p>The Applicant has provided Devon County Council with junction modelling data for the Manteo Way/Barnstaple Road Junction and is aware of Councils concerns in relation to the performance of this junction.</p> <p>The Applicant has clarified in a meeting with the Devon County Council traffic lead that the Applicant's traffic assessment does not indicate a need for mitigation at this junction.</p> <p>However, due to a recognition of Council's concerns about the junction's future performance, the Applicant would be willing to enter an appropriate s106 agreement with Devon County Council to contribute a proportionate level of funding for improvements to this junction by the Council.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Transport assessment</p>	<p>An assessment will therefore need to be made of this junction, but it is highly likely that analysis will show that the additional traffic from the construction traffic associated with the Xlinks proposal cannot safely be accommodated within the current capacity of this junction. The Xlinks proposal will, therefore, likely have to upgrade this junction to accommodate 400 daily staff plus over 100 HGVs using it for the long construction period. A roundabout junction would be preferable, however, due to limitations of adjacent land, including this being functional drainage, a traffic signal junction may be acceptable. This would also cater for improved links for people walking and cycling between Manteo Way and the Tarka Trail.</p>	<p>Devon County Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>A Priority Intersection Capacity and Delay (PICADY) transport software assessment of the Barnstaple Street / Manteo Way junction has been undertaken as part of the assessment. The results of the PICADY assessment are set out in section 5.10 of Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5).</p> <p>The Applicant has provided Devon County Council with junction modelling data for the Manteo Way/Barnstaple Road Junction.</p> <p>The Applicant has clarified in a meeting with the Devon County Council traffic lead that the Applicant's traffic assessment does not indicate a need for mitigation at this junction.</p> <p>However, due to a recognition of Council's concerns about the junction's future performance, the Applicant would be willing to enter an appropriate s106 agreement with DCC to contribute a proportionate level of funding for improvements to this junction by Council.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Transport assessment</p>	<p>Further to the above and as suggested in Paragraph 5.8.28 in relation to the Barnstaple Road/ Manteo Way Junction, it is not considered possible to limit vehicle movements through this junction to 10 as there would be no absolute control over the arrival and departure of construction staff or materials. Additionally, a new peak time for traffic may be created by bringing in 400 staff. Issues at this junction also relate to safety and the additional substantial traffic volumes will increase conflict and may result in both an increase in collisions and an increase in the severity of collisions. Any traffic count/forecast data used to consider the impacts of the proposal needs to include consented but unbuilt developments in the area.</p>	<p>Devon County Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>The integrated Transport Assessment within Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5) demonstrates that the addition of construction staff movements would not result in a new peak time for traffic being created at the Barnstaple Street / Manteo Way junction.</p> <p>A Priority Intersection Capacity and Delay (PICADY) assessment of the Barnstaple Street / Manteo Way junction has been undertaken as part of the assessment.</p> <p>PIA data obtained from Devon County Council covering the latest available five-year period indicates that no injury accidents have been recorded at the Barnstaple Street / Manteo Way junction between 1 January 2019 and 31 December 2023, which suggests no highway safety issues in this area of the local highway network.</p> <p>The 2028 future baseline for the assessment has been created by applying relevant traffic growth rates obtained from the DfT National Trip End Model for the respective road types to 2024 base traffic flows with the addition of traffic flows, plus any associated transport infrastructure, generated by committed development, where appropriate.</p> <p>The Outline Construction Traffic Management Plan (CTMP) (Document Ref: 7.12) includes demand management measures to be used during the construction phase of the Proposed Development, including restrictions on operating hours to minimise the number of HGV movements through sections of the highway network.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Transport assessment</p>	<p>DCC is of the view that the proposed temporary traffic signals at the A386/ Littleham Road Junction, detailed in paragraph 5.8.31, should be permanent signals which are removed after the scheme is complete. The Council consider this is justified based on previous experience of the maintenance implications such as battery/ generator replacement and the 24-hour emergency cover required by temporary, often portable traffic signals. With such an arrangement in place for many years, there will be other issues such as the highway being unevenly trafficked, and maintenance not being able to occur on this section of road due to the presence of the lights.</p>	<p>Devon County Council</p>	<p>This is noted and has been addressed in the DCO Application.</p> <p>The traffic signals at the A386 / Littleham Road junction would be permanently installed in the construction phase and would be removed following the construction of the Proposed Development.</p> <p>Further detail is provided in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5).</p>	<p>N</p>

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Transport assessment</p>	<p>Paragraph 5.8.100 states that ‘It is possible to estimate the impact of increased traffic on road safety from existing personal injury accidents (PIA) records, national statistics and the type and quantity of traffic generated by the Proposed Development.’ This is considered a general statement that does not adequately reflect the potential for safety issues to arise from this proposal. Although paragraph 5.13.1 is noted (Given the time between preparation of this PEIR chapter and the ES chapter, and to ensure the ES chapter utilises the most up to date data available at that time, new up to date PIA data will be obtained from DCC for analysis of the impact of the construction phase of the Proposed Development on road safety) this short section on road safety bases assessment only on areas that have collisions already, and only at locations where there are clusters of collisions. The previous five years of data include periods of time during which the population were under ‘lockdown’ and collisions lower. Assessment should be made of the safety of the road network where the largest impacts will arise, regardless of the volume of existing collisions. Other locations should be considered in terms of safety, along the links considered, and elsewhere, such as:</p> <ul style="list-style-type: none"> • Westleigh Junction A39/B3233; • Alverdiscott Road adjacent to Bideford East The Water Primary School; • Heywood Roundabout A39/A386; • Abbotsham Cross A39/Clovelly Road; • Manteo Way; and • Bideford Quay A386 	<p>Devon County Council</p>	<p>This is noted and has been addressed in the ES.</p> <p>As set out in section 5.10 within Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5), the assessment considers that the Proposed Development would have a minor impact of construction traffic on road safety.</p> <p>PIA data has been obtained from Devon County Council covering the latest available five-year period between 1 January 2019 and 31 December 2023 to consider road safety within the study area.</p> <p>The PIA data has been interrogated for all highway links within the study area (which includes the locations identified by Devon County Council) to identify clusters of injury accidents, including Alverdiscott Road adjacent to Bideford East-the-Water Primary School, Abbotsham Cross Roundabout along the A39, Manteo Way and other sections of the A386 through Bideford.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Transport assessment	Paragraph 5.8.103 states that 'A review of the CrashMap database has been undertaken to determine key locations within the study area for assessment within this PEIR chapter.' As previously raised within our scoping opinion response, and as also agreed by PINS, we would advise that www.crashmap.co.uk should not be used as it is not verified and would recommend that the verified collision data provided by Devon County Council at the following link https://www.devon.gov.uk/roads-and-transport/safe-travel/road-safety/collision-data/ should be used instead.	Devon County Council	This is noted and has been addressed in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5). PIA data has been obtained from Devon County Council covering the latest available five-year period between 1 January 2019 and 31 December 2023 to consider road safety within the study area instead of the CrashMap data. The analysis of PIAs within the study area has been undertaken in section 5.7 of the ES chapter. The traffic and transport impact of the Proposed Development on highway safety has been considered in section 5.10.	N
Transport assessment	Regarding Table 5.29 Summary of potential environmental effects, we would like to question why all the Highways Links aren't included within this table for assessment purposes.	Devon County Council	This is noted and has been addressed in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5). The highway links within the study area which do not exceed the respective Rule 1 and Rule 2 thresholds have been screened out of the EIA assessment in accordance with the IEMA guidelines as the environmental effects on traffic and transport receptors along these highway links would be of negligible adverse significance and not significant in EIA terms.	N
S106	Overall and given the large volume of HGVs and staff construction traffic during the 6 year construction period, we would likely seek a number of s106 contributions to mitigate the impacts that the proposal will have and which will be experienced first-hand by local residents, road users and visitors to the area. Such impacts are likely to include worsening condition of local roads and increased 'potholes' due to the large volume and period of time that the construction traffic will operate and will inevitably require periodic highway maintenance.	Devon County Council	The Applicant has proposed to enter a s106 with Devon County Council relating to contributions to road maintenance. The Applicant notes that the details of this s106 agreement are yet to be confirmed. The Applicant also notes that the Construction Contractors will be responsible for repairing any damage to the roads directly associated with their works during the construction period. The s106 contribution would therefore relate to maintenance of the broader road network potentially affected by the Proposed Development following completion of construction.	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
S106	In support of this, the Highways Authority would include in any agreement the requirement for a before and after condition survey of those roads most likely to be impacted by the construction traffic, with the developer committing to any repairs over that construction period.	Devon County Council	This is noted and has been addressed in the DCO Application. The Applicant agrees the need for before and after condition surveys and this requirement is included in the Outline CTMP (Document Ref: 7.12).	N
S106	It is also likely that any s106 agreement would include the requirement for any identified improvements to the local road network such as traffic lights.	Devon County Council	The Applicant notes the Council's request for inclusion of improvements to the road network as part of the s106 agreement. The Applicant notes that the scope of the s106 agreement has not been agreed with Devon County Council yet, but would be developed and agreed following the DCO application and prior to the DCO grant.	N
Transport Assessment	Whilst a Transport Assessment will be required to cover the whole of the local road network, the Highways Authority would ask that Manteo Way/ Barnstaple Street junction be given specific consideration so that we may determine the potential impacts of the proposal and whether any legal agreement would need to include upgrades to this junction.	Devon County Council	This is noted and has been addressed in the ES. A PICADY assessment of the Barnstaple Street / Manteo Way junction has been undertaken as part of the assessment. The results of the PICADY assessment are set out throughout section 5.10 of Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5). As a result of this assessment, the adopted CTMP will set out restrictions on construction HGV movements through the Barnstaple Road/Manteo Way junction to limit these to no more than 10 per hour during the peak hours.	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
On-CEMP	It is acknowledged that an Outline Onshore Construction and Environmental Management Plan (On-CEMP) will be submitted with the application for development consent and we would like to reiterate that any such plan shall include details of the measures being put in place to maintain access, where possible, to any affected routes during construction and detail how the applicant intends to ensure all Public Rights of Way legislation requirements are met should any routes require diversion or temporary closure.	Devon County Council	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Outline Public Rights of Way Management Plan (Document Ref: 7.11) submitted as part of the DCO application, includes measures for the management of the PRoW network during the construction of the Proposed Development.</p> <p>The Applicant engaged with Devon County Council representatives responsible for managing Public Rights of Way (PRoW) on 18 October 2024 to discuss potential impacts on the PRoW. The Applicant provided a copy of the draft PRoW management plan prior to the DCO application and will update the plan at an agreed deadline to incorporate any comments from Council on the plan.</p>	N
Construction traffic	Traffic from the construction phase has the potential to have a significant impact on the Bideford area, in particular the Bideford-East and Two Rivers & Three Moors Wards, for up to six years due to large increases in traffic travelling Manteo Way and between the construction compounds and the convertor station site. Figures in the PEIR show up to 80 HGV movements per day, plus up to 532 other vehicles, an increase of 29% and 10% on projected traffic flows for 2027. Clarification is sought as to whether these predictions consider likely increases in traffic from new housing developments expected to be built over this period, also additional HGVs and other traffic from the proposed Bideford Business Park development. The Council also wants to highlight its proposal for a new Operational Services Centre, which would be accessed via Manteo Way / Alverdiscott Road, and the need for the EIA to consider traffic movements from this development in any cumulative assessment.	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>The relevant potential traffic and transport impacts during the construction phase of the Proposed Development are considered in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5), section 5.10.</p> <p>Other developments which emerge at the same time as the construction period of the Proposed Development are treated together and are cumulatively assessed against the baseline scenario to determine their cumulative impact and their cumulative highway and transport mitigation requirements.</p> <p>The cumulative environmental assessment set out in section 5.11 of the ES chapter considers the cumulative effect of new developments expected to be built out over the construction period, including part of the proposed Bideford Business Park development and the Operational Services Centre.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Construction traffic</p>	<p>Northern Devon already has a significant problem with the poor standard of the highway network, particularly a high prevalence of potholes. While Manteo Way has been repaired recently by the Local Highway Authority, the impact of this level of increase of traffic will undoubtedly cause considerable wear and tear to all the roads being used by Xlinks during the extensive construction phase. The movement of very heavy loads, electrical equipment etc., will add a burden to the District's roads which will need to be mitigated for.</p>	<p>Torridge District Council</p>	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Outline CTMP (Document Ref: 7.12) sets out that a pre-entry condition survey will be undertaken before the start of works and after the substantial completion of works on minor highway links and new junctions used by HGVs to access the Onshore Infrastructure Area. Any damage to the highway that has been demonstrably caused by construction traffic associated with the Proposed Development will be repaired.</p> <p>The Applicant has proposed to enter a s106 with Devon County Council relating to contributions to road maintenance. The Applicant notes that the details of this s106 agreement are yet to be confirmed.</p> <p>The Applicant also notes that the Construction Contractors will be responsible for repairing any damage to the roads directly associated with their works during the construction period. The s106 contribution would therefore relate to maintenance of the broader road network potentially affected by the Proposed Development following completion of construction.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
HGVs	The PEIR report shows Xlinks construction work will lead to increases of up to 38% in HGV traffic on the A39. Although the cabling work construction period is only estimated to be over a couple of years (compared with five or six for the converter station construction), this still has the potential to give rise to a considerable impact and should be properly assessed and mitigated for through the EIA process. The views and position of the Local Highway Authority (Devon County Council) will be important in this regard, however, as a 'host authority', the Council wishes to be involved in all highway discussions throughout this Pre-Application Stage.	Torrige District Council	<p>This is noted and has been addressed in the ES.</p> <p>The Applicant notes that the increase in HGV numbers referenced by Council is associated with worst case peak HGV numbers for one link between Abbotsham Cross Roundabout and Fairy Cross associated with works in the Onshore HVDC Cable Corridor, which as Council notes is of a much shorter duration than the overall construction programme. The potential impacts of the potential peak HGV numbers have been properly assessed in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5)</p> <p>The Applicant has had regular meetings with Torrige District Council and Devon County Council planning officers, including the traffic lead for Devon County Council. The Council representatives have been advised that these meetings will continue post DCO application submission, particularly as the detailed design for the proposed highways works develops.</p>	N
Waste				
Waste policy	The applicant should be aware that the Devon Waste Plan forms part of the development plan and the local planning policy context for the application area, with Policy W4: Waste Prevention being the most relevant policy.	Devon County Council	This is noted and has been addressed in the ES.	N

Topic	Summary of comments	Local authority	Response	Design change (Y/N)
<p>Site Resource and Waste Management Plan</p>	<p>There are references to multiple documents that will be produced to detail the amount and management of waste. The Waste Planning Authority understands that an Outline Site Resource and Waste Management Plan will be produced, with a detailed Site Resource and Waste Management Plan (SWMP) developed in accordance with this document. We are not clear if there will be separate offshore and onshore SWMPs as there is also mention of an Offshore Waste Management Plan. There would also be Outline Offshore Construction Environmental Management Plan, and an Outline Onshore Construction Environmental Management which would then be developed into final versions. It is understood these outline documents will be submitted with the Environmental Statement.</p>	<p>Devon County Council</p>	<p>This is noted and has been addressed in the DCO Application.</p> <p>An Outline Site Resource and Waste Management Plan has been developed to support the Outline Onshore CEMP (Document Ref: 7.7). The Site Resource and Waste Management Plan will be updated by the Construction Contractor prior to commencement of construction.</p> <p>A Site Resource and Waste Management Plan is not proposed to support the Outline Offshore CEMP (Document Ref: 7.9) as the cable burial methodology and other work methods proposed by the Applicant generate small quantities of waste and as such waste management measures are incorporated into the Outline Offshore CEMP (Document Ref: 7.9).</p>	<p>N</p>
<p>Site Resource Waste Management Plan</p>	<p>As an Outline Site Resource and Waste Management Plan has not been produced at this stage, and the Waste Planning Authority cannot find reference elsewhere as to how much material will be generated during both the onshore and offshore development during construction, operation, and decommissioning, it is hard to comment on the implications of this. It is noted the project description states that most waste will be produced during construction and decommissioning, but the above proposed documentation seem to focus only on construction. The Outline SWMP should include the expected quantities and types of any waste that will be generated all stages of the development, as set out by the Planning Inspectorate.</p>	<p>Devon County Council</p>	<p>The Outline Site and Resource Waste Management Plan forms Appendix B of the Outline Construction Environmental Management Plan submitted with the DCO application (Document Ref: 7.7).</p> <p>The final Site Waste Management Plan(s) will include waste and resource use forecasts that will be prepared alongside the detailed design process. The final Site Waste Management Plan(s) will be updated during the construction phase to document progress against waste management forecasts.</p> <p>It has not been possible to estimate quantities prior to the detailed design stage.</p> <p>The Converter Site is not expected to generate significant quantities of waste during operation and is therefore not within the scope of the SRWMP.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Waste hierarchy	<p>Whilst reference is made in various locations about waste being managed in accordance with the waste hierarchy, this expectation should be clear and consistent within the Outline SWMP and Outline CEMPs. It is noted that the Outline Offshore CEMP only refers to the disposal of waste, but according to the waste hierarchy, disposal is the last resort. It is noted that the re-use of dredged material will be considered before disposal. The applicant should explore whether this could be a potential resource and sold as an aggregate.</p>	<p>Devon County Council</p>	<p>This is noted and has been addressed in the DCO Application.</p> <p>As highlighted in the outline On-CEMP (Document Ref: 7.7) in Section 1.6.8, waste from the construction of the Proposed Development would be managed in accordance with the principles of the waste hierarchy (i.e., avoid, reduce, reuse, recycle, recover and disposal) and the Outline Site Resource and Waste Management Plan, which is a part of the Outline On-CEMP (Document Ref: 7.7).</p> <p>The Applicant notes that offshore cable burial methodology does not require dredging in the sense of generating 'dredged materials' that require disposal. The only 'dredging' required for the offshore works is at the HDD exit pit where the seafloor will be excavated for the exit pit with materials being pushed to the side of the pit to facilitate works and then backfilled using the same material.</p>	<p>N</p>

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Soils	The intention to reuse soils and inert material for the cable corridor and Converter Site is supported, and should waste not be able to be reused at these locations, the use elsewhere across the project should be explored.	Devon County Council	<p>This is noted and has been addressed in the DCO Application.</p> <p>A Soil Management Plan(s) would be developed in accordance with the Outline Soil Management Plan, which is a part of the Outline On-CEMP (Document Ref: 7.7), to characterise and manage soil materials during construction. This plan would include measures including separate stripping and storage of topsoil and subsoil; location and maintenance of topsoil and subsoil heaps; soil handling machinery; soil aftercare; and supervision of soil handling operations on site.</p> <p>Prior to construction, further soil survey work would be undertaken to identify the depths of different topsoil and subsoil units (if necessary) to be stripped within the working areas and to inform a detailed Soil Management Plan(s), to ensure that soil types are separately stored where required. The Soil Management Plan(s) would be prepared and agreed post-consent as part of the On-CEMP(s).</p> <p>Soil would be stored and managed in accordance with Construction Code of Practice for Sustainable Use of Soils on Construction Sites (DEFRA, 2018) or the latest relevant available government guidance.</p>	N

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Topic	Summary of comments	Local authority	Response	Design change (Y/N)
Site Resource Waste Management Plan	<p>The Waste Planning Authority typically requires the following to be addressed in any Site Waste Management Plan:</p> <ul style="list-style-type: none"> • Identify measures taken to avoid all waste occurring. • Demonstrate the provisions made for the management of any waste generated to be in accordance with the waste hierarchy, and that the minimum amount of waste is being disposed of. • The amount of construction, excavation and decommissioning waste in tonnes, set out by the type of material. • Identify targets for the re-use, recycling and recovery for each waste type from during construction, excavation and decommissioning, along with the methodology for auditing this waste including a monitoring scheme and corrective measures if failure to meet targets occurs. • The details of the waste disposal methods likely to be used, including the name and location of the waste disposal site. 	Devon County Council	<p>This is noted and has been addressed in the DCO Application.</p> <p>The Outline Site Resource and Waste Management Plan, which is a part of the Outline On-CEMP (Document Ref: 7.7), includes these measures.</p>	N

APPENDIX J-3: REGARD HAD TO STATUTORY CONSULTATION RESPONSES FROM CONSULTEES UNDER S42(1)(D)

Table J.3.1 below sets out responses to the statutory consultation from consultees under s42(1)(a) of PA 2008 concerning offshore elements of the Proposed Development and the regard had to them by the Applicant. It should be read in conjunction with Section 7.3 of the Consultation Report (Document Ref: 5.1).

References to respondents are given in Table E-3.1 and Table E-3.2 of the Appendix E-3 (Document Ref: 5.2) of the Consultation Report.

Table J.3.1 - Offshore: Summary of Section 42(1)(d) responses and regard had by topic

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Construction				
Cable route	Be careful where you lay the cable in the beds.	1041. (Cat 3)	Our proposed route avoids all subtidal protected sites so that there will be no loss of protected habitats. We do not anticipate any significant effects on benthic ecology. Where we have identified fragile habitats, we would route the cable to avoid impacts. Potential impacts on benthic ecology have been assessed Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1).	N
Fishing	What would be the effect on local shore fishing be during the offshore construction phase?	1203. (Cat 3)	Potential impacts on charter and recreational angling, defined as fishing for marine species where the purpose is recreation and not sale or trade, are assessed Volume 3, Chapter 6: Other Marine Users of the ES (Document Ref: 6.3.6). There are no proposed above ground works that are within the local shore zone. Horizontal Directional Drilling (HDD) is proposed to connect the onshore and offshore HVDC cables. There are no significant impacts predicted for recreational angling.	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Marine environment				
Environmental impact	Offshore construction will cause disruption to the marine environment, ecological damage, and damage to wildlife.	946. (Cat 3)	Installation trenches along the offshore cable corridor are typically 1 metre wide by 1.5 metres deep along the offshore cable corridor. Horizontal Directional Drilling techniques will avoid any interaction with the coastal cliffs, the beach and the intertidal area. Potential impacts to the marine environment from the Proposed Development have been assessed in Volume 3, Chapters 1-9 of the ES, with measures set out in the ES to mitigate any impacts. Following mitigation, all residual impacts to marine ecological receptors are assessed as being not significant in EIA terms.	N
Electric currents	The operation of the offshore part of the project will cause damage to marine creatures from electric and magnetic currents coming from cables.	946. (Cat 3)	The presence of EMF has been assessed for turtles and marine mammals and presented in Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document Ref: 6.3.4). The significance of effect from EMF on marine mammals and sea turtles during the operational and maintenance phase is not significant in EIA terms.	N
Other issues				
Electric currents	Concern over the effects of electric and magnet currents on seabeds.	946. (Cat 3)	The presence of EMF has been assessed for turtles and marine mammals and presented in Volume 3 Chapter 4: Marine Mammals and Turtles of the ES (Document Ref. 6.3.4). The significance of effect from EMF on marine mammals and sea turtles during the operational and maintenance phase is not significant in EIA terms.	N

Table J.3.2 below sets out responses to the statutory consultation from consultees under s42(1)(a) of PA 2008 concerning onshore elements of the Proposed Development and the regard had to them by the Applicant. It should be read in conjunction with Section 7.4 of the Consultation Report (Document Ref: 5.1). References to respondents are given in Table E-2.1 and Table E-2.2 of the Appendix E-2 of the Consultation Report.

Table J.3.2 - Onshore: Summary of Section 42(1)(d) responses and regard had by topic

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Air quality				
Air pollution	Concern about the air pollution as a whole coming from the site.	684. (Cat 3)	<p>Air quality impacts resulting from possible releases of dust during construction are assessed within sections 7.10 to 7.12 of Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7).</p> <p>Mitigation measures are outlined in Table 7.21, which would be implemented during construction and decommissioning to ensure that impacts from dust are reduced to levels that are not significant in EIA terms.</p> <p>As such, this chapter concludes that there would be no significant effects arising from the Proposed Development.</p> <p>Air quality during construction will be effectively controlled via a Dust Management Plan (DMP) (Document Ref: 7.9) which supports the Construction Environmental Management Plan (CEMP) (Document Ref: 7.7). Both documents will be submitted for approval by TDC prior to construction.</p> <p>Both documents are submitted in outline with the application for Development Consent.</p>	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Dust	There will be dust and disturbance in the area due to many HGVs on narrow roads during the construction of the converter station.	946. (Cat 3)	<p>In order to reduce the impact on the local road network of HGV traffic, the Applicant is proposing to utilise haul roads for large parts of the route during the construction of the Proposed Development. This will direct HGV traffic away from the highway network, limiting the potential for dust, noise and traffic impacts.</p> <p>An assessment of dust generated during the construction and decommissioning phases is considered in section 7.10 and section 7.12 respectively within Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7).</p> <p>Mitigation measures are outlined in Table 7.21, which would be implemented during construction and decommissioning to ensure that impacts from dust are reduced to levels that are not significant in EIA terms.</p> <p>As such, this chapter concludes that there would be no significant effects arising from the Proposed Development.</p> <p>The Outline Onshore Construction Environmental Management Plan (Document Ref:7.7) includes an Outline Dust Management Plan (DMP) which sets out mitigation measures to manage dust generation during construction.</p>	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Dust	Dust and any air born pollution caused by your works.	274; 282. (Cat 3)	<p>Air quality impacts resulting from increases in dust are assessed within sections 7.10 to 7.12 of Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7).</p> <p>An assessment of dust generated during the construction and decommissioning phases is considered in section 7.10 and section 7.12 respectively.</p> <p>Mitigation measures are outlined in Table 7.21, which would be implemented during construction and decommissioning to ensure that impacts from dust are reduced to levels that are not significant in EIA terms.</p> <p>As such, this chapter concludes that there would be no significant effects arising from the Proposed Development.</p> <p>The Outline Onshore Construction Environmental Management Plan (Document Ref:7.7 includes an Outline Dust Management Plan (DMP) which sets out mitigation measures to manage dust generation during construction.</p> <p>This is because the results of the traffic and transport assessment (Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5)) indicate that the relevant EPUK and IAQM thresholds are not expected to be exceeded for any individual road during any phase of the Proposed Development. Further details are provided in Table 7.8.</p>	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Dust	Another concern regarding the widening of this road is the accumulation of dust and dirt during the process of this. With several valuable cars at our residents and customers vehicles from both mine and my partners businesses this will cause major disruptions to our everyday lives. Disruptive noises will affect our day to day lives along with road closures to enable this road to be widened will affect our customers being able to reach us and will extend our travel times to and from locations.	684. (Cat 3)	Air quality impacts resulting from increases in dust are assessed within sections 7.10 to 7.12 of Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7). Increases in noise pollution are considered within Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6). The Applicant does not require or intend to widen the full extent of Gammaton Road, and widening works will only be undertaken where required to facilitate operational access by AIL vehicles in the future. As such, the duration of any widening works and any potential noise and dust will be of short-term duration. Dust management measures will be implemented in accordance with the Outline Dust Management Plan included in the Outline Onshore CEMP (Document Ref:7.7). Noise management measures will also be implemented following approval of the plan by Torridge District Council).	N
Alternatives and need				
Energy security	No this should not go ahead any sane person can see taking power from so far away is not environmentally friendly you must think outside of the box and plan much further ahead we everything that had gone on in the world we must be self sufficient in energy come on think.	395. (Cat 3)	The Statement of Need (Document Ref: 7.1) provides relevant legal, policy, and industry evidence in support of the urgent need to reduce carbon emissions from electricity generation and actions to support the security and reliability of electricity supplies in the UK. It also provides evidence in support of the benefits brought forward by the Proposed Development in relation to enabling a low-carbon, reliable, secure, and affordable energy system for consumers. As outlined in the Planning Statement (Document Ref: 7.2), Part 3 of National Policy Statement EN-1 establishes an indisputable and urgent policy need for all types of energy infrastructure in order to achieve energy security and dramatically reduce carbon emissions (NPS EN-1, paragraph 3.1.1). Part 3 also explains that, without significant amounts of new large-scale energy infrastructure, the Government's energy and climate change objectives cannot be fulfilled. The NPSs also confirm that	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
			<p>assets which provide flexibility to the national electricity system, or to the energy system generally, are also needed to achieve national decarbonisation and energy security aims. The Proposed Development, which is critical infrastructure to transmit low carbon energy from an internationally located solar, onshore wind, and storage facility to the UK's electricity system, is therefore fully aligned with the government's aims.</p> <p>We agree that we should maximise the UK's domestic renewables opportunity. However, the Applicant submits that we will need a more diverse mix of reliable, affordable and green power to keep the UK running in the coming years as our energy system, transport and homes become increasingly electrified, and demand for electricity continues to grow. This includes by developing more greater interconnection between the domestic UK market and generation sources elsewhere. The Morocco-UK Power Project will be an important contributor to a well-balanced grid.</p> <p>A lot of power is already imported into the UK, including 20% of electricity demand in in Q2 2024. The recent development of new electricity connections with other countries allows for the import and export of electricity as a complement to domestic generation capacity. This project helps to bring clean reliable power, on a dedicated supply from Morocco, a long-standing UK economic partner.</p>	
Support	We/I Agree with and/or support the project	538;847. (Cat 3)	This is noted.	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
<p>Need case</p>	<p>You are cynically choosing a sparsely populated route where you would expect the least resistance.</p>	<p>274; 282. (Cat 3)</p>	<p>Scheme alternatives are considered in Volume 1, Chapter 4: Need and Alternatives of the ES (Document Ref: 6.1.4) and in the Planning Statement Annex 2: Project Development and Consideration of Options (Document Ref:7.2).</p> <p>As outlined in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3), the cable route that has been chosen has been designed to take account of existing constraints, including roads, rivers and existing built infrastructure. We agree that minimising the impacts on local people has been among the key considerations in the selection of the route.</p>	<p>N</p>

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<p>Energy security</p>	<p>The insecurity of supply of a large percentage of UK power when we are surely looking to produce more home generated electricity to avoid our past reliance on overseas sources.</p>	<p>274; 282. (Cat 3)</p>	<p>The Proposed Development can bring clean reliable power to the UK, on a dedicated supply, with the involvement of Morocco, a long-standing UK partner. Morocco has become, over the last 10 years, an international leader in renewable energy. Morocco's National Energy Strategy, which has a focus on the deployment of renewable generation, was launched in 2008. Morocco offers an attractive and stable investment climate. Multiple international power companies have invested successfully in the Moroccan energy market, including TAQA of the United Arab Emirates, ACWA Power of Saudi Arabia, TotalEnergies, Engie and EDF of France, and Siemens of Germany. And while we believe that we should maximise the UK's domestic renewables opportunity, it is a fact that a more diverse mix of reliable, affordable and green power is key to keeping the UK running in the coming years as our energy system, transport and homes become increasingly electrified, and demand for electricity continues to grow.</p> <p>A lot of power is already imported into the UK, including 20% of electricity demand in in Q2 2024. The recent development of new electricity connections with other countries allows for the import and export of electricity as a complement to domestic generation capacity.</p> <p>The Proposed Development is needed so that the Project's international generation assets can enable an energy system that meets the Government's objectives to create a secure, reliable, and affordable energy supply for consumers to security of supply. Aggregated generation output from wind, solar, and storage is more predictable, less variable, and more flexible than output from a single generation technology, providing security and reliability of supply benefits for consumers. The power generated as part of the Project would complement the energy we already generate from the sun and wind in the United Kingdom. When domestic renewable energy generation in the UK drops due to low winds and short periods of sun, the Project can provide access to the</p>	<p>N</p>
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Topic	Summary of comments	Reference	Response	Design change (Y/N)
			<p>benefits of long hours of sun and consistent winds in Morocco to provide a firm but flexible source of zero-carbon electricity.</p> <p>The inclusion of a 22.5GWh/5GW battery facility in Morocco means this energy would be reliably available when it's most needed in Great Britain. The Morocco-UK Power Project will be an important contributor to a well-balanced grid. The Project offers an international solution to bringing forwards decarbonisation, energy security, and affordability benefits also ascribed to nationally significant infrastructure.</p>	

<p>Need case</p>	<p>Why XLinks has chosen to make landfall in North Devon rather than in South Wales or further up the Severn Estuary where this power is eventually destined to be used? I cynically suspect it is considered to be the area of least resistance and cannot be the only part of the UK that the National Grid has offered! If North Devon is really the only option, the route causing the least disruption to the whole area must be to come up the Taw/Torridge Estuary to the East Yelland Electricity Sub Station on the brownfield site of the old Yelland Power Station and follow the existing line of pylons to their intended destination at the Alverdiscott Electricity Sub Station. This is some two and a half miles shorter than the proposed route, benefits from the precedent set for the existing Wayleaves granted and avoids all the more populated areas. I am sure that in the proposed budget of £28 billion this extra cost and the extra technical constraints that this involves can be overcome and would receive much more support from the residents of North Devon. I understand from National Grid that they have only offered Alverdiscott as a destination if you choose North Devon, but that the exact route taken to get there is your choice.</p>	<p>274; 282. (Cat 3)</p>	<p>Scheme alternatives are considered in Volume 1, Chapter 4: Need and Alternatives of the ES (Document Ref: 6.1.4) and in the Planning Statement Annex 2: Project Development and Consideration of Options (Document Ref:7.2).</p> <p>As set out in the Planning Statement submitted as part of the DCO application, Schedule 4 of the EIA regulations requires that a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects be provided.</p> <p>The site selection and assessment of alternatives process undertaken by the Applicants has been outlined within Volume 1, Chapter 4: Need and Alternatives of the ES (Document Ref: 6.1.4) and the Project Development and Consideration of Options (Annex 2 of the Planning Statement).</p> <p>The selection of the region at which landfall is made has been heavily informed by an assessment undertaken by the National Grid Electricity System Operator (NGESO) which identified the Alverdiscott Substation Site as the most appropriate location for the Proposed Development to connect into the National Grid. The Applicant undertook supplementary assessments (included as appendices to Volume 1, Chapter 4: Need and Alternatives (Document 6.1.4) to the NGESO assessment to confirm the Alverdiscott Substation Site was the most appropriate option. The NGESO and Applicant's assessments all included South Wales connection points in their assessments.</p> <p>The Landfall Report included in Volume 1, Chapter 4: Need and Alternatives (Document 6.1.4) assessed an option for the offshore HVDC cable to make landfall via the Taw Torridge Estuary but this was discounted for a number of reasons, including the potential for</p>	<p>N</p>
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Topic	Summary of comments	Reference	Response	Design change (Y/N)
			<p>the cable to be uncovered due to the high level of sand movement within the Estuary.</p> <p>The Applicant also notes that the East Yelland substation is not a suitable connection point as it is a 33kV/132kV connection point, and the Proposed Development requires a 400kV connection into the national grid. This would result in a significant upgrade of the East Yelland substation being required, including new overhead lines across the surrounding countryside.</p>	

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
<p>National Grid</p>	<p>You have stated that; We worked with National Grid to identify the optimal connection site.</p> <p>Despite this, when asked, you have stated that you have no involvement in the selection of the connection site and when questioned you have stated that North Devon may not be the most logical connection site when looking at cable routes from the South of the UK. You have merely dismissed alternatives as being outside your control.</p> <p>We expect that you share the work you have referenced in your Q&A and completed with National Grid and provide evidence to clearly demonstrate why this is the 'optimal site'.</p> <p>We would expect the Planning Inspectorate to understand in detail the options you have considered with National Grid for the UK connection as part of the DCO process.</p>	<p>41; 43 (Cat 1&2)</p>	<p>Scheme alternatives are considered in Volume 1, Chapter 4: Need and Alternatives of the ES (Document Ref: 6.1.4) and in the Planning Statement Annex 2 Project Development and Consideration of Options (Document Ref:7.2).</p> <p>The selection of the region at which landfall is made has been heavily informed by an assessment undertaken by the National Grid Electricity System Operator (NGESO) which identified the Alverdiscott Substation Site as the most appropriate location for the Proposed Development to connect into the National Grid. The Applicant undertook supplementary assessments (included as appendices to Volume 1, Chapter 4: Need and Alternatives (Document 6.1.4) to the NGESO assessment to confirm the Alverdiscott Substation Site was the most appropriate option.</p> <p>Additionally, compared with the alternative options considered above, the Alverdiscott substation was highlighted as being at minimal risk of significant conflict with nearby infrastructure and had limited environmental constraints identified within the initial appraisal.</p>	<p>N</p>

<p>Need case</p>	<p>You have only considered one route to the Alverdiscott Site. This has been varied slightly to avoid the village of Abbotsham, but you have not clearly evidenced why this route the most suitable compared to alternatives.</p> <p>The current route drives straight through the important Mermaid's Pool to Rowden Gut Site of Special Scientific Interest (SSSI).</p> <p>There is an alternative option that needs to be considered that avoids the SSSI and provides the option for a much more direct route to Alverdiscott. This route also has closer access to the A39.</p> <p>This comes via Peppercombe Beach as shown indicatively on the plan below.</p> <p>Despite asking, we have had no evidence to demonstrate that this route is optimal and why alternative routes have been dismissed.</p> <p>We would expect the Planning Inspectorate to understand in detail the options you have considered for the cable routes as part of the DCO process.</p>	<p>41; 43 (Cat 1&2)</p>	<p>The site selection and assessment of alternatives process undertaken by the Applicants has been outlined within Volume 1, Chapter 4: Need and Alternatives, of the ES (Document Ref: 6.1.4) and the Project Development and Consideration of Options (Annex 2 of the Planning Statement).</p> <p>The development and consideration of alternatives during the assessment process for the onshore cable corridor route took account of planning and environmental features, including existing infrastructure, designated sites and SSSI, as well as engineering and cost considerations, such as the crossing of the River Torridge.</p> <p>As part of the initial corridor route selection, the Applicant met with landowners and undertook a walkover of the route, following which the route was refined by taking account of local knowledge from the landowners. This included existing residential property access to natural water sources, farming activities including seasonal activities, land drainage and flooding, minimisation of farm business impact, and reduced impact on farm access.</p> <p>The onshore HVDC Cable Corridor route was also further refined following the Stage 1 Design and first non-statutory consultation in November 2022. As a result of concerns raised about the cable corridor's proximity to Abbotsham, the proposed HVDC cable corridor route was amended to be located further from Abbotsham. This amended route was consulted on at the second non-statutory consultation in April 2023.</p> <p>Horizontal Directional Drilling (HDD) is being used to facilitate the landfall of the HVDC cables, thereby avoiding potential impacts on the Mermaid's Pool to Rowden Gut Site of Special Scientific Interest (SSSI). Alternative landfall locations were assessed as detailed in the landfall assessment provided as an appendix to Volume 1, Chapter 4: Need and Alternatives, of the ES (Document Ref: 6.1.4).</p>	<p>N</p>
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Topic	Summary of comments	Reference	Response	Design change (Y/N)
			<p>Options for the landfall location were narrowed following review to a site at Peppercombe Beach, and the site at Cornborough Range which was ultimately selected. While there were advantages identified for both options, overall, Cornborough was preferred over Peppercombe because Peppercombe has steeper topography that affects site access, duct stringing, beach access, the topography allows a consistent depth of cover below bedrock, and it also has less consistent geology with a greater risk of drilling difficulties.</p>	
<p>Need case</p>	<p>The UK could provide all its own energy cleanly and renewably by insulating every homes and putting solar panels on all roofs, including farms and industrial.</p>	<p>946. (Cat 3)</p>	<p>As outlined in the Planning Statement (Document Ref: 7.2), Part 3 of National Policy Statement EN-1 establishes an indisputable and urgent policy need for all types of energy infrastructure in order to achieve energy security and dramatically reduce carbon emissions (NPS EN-1, paragraph 3.1.1). Part 3 also explains that, without significant amounts of new large-scale energy infrastructure, the Government’s energy and climate change objectives cannot be fulfilled.</p> <p>Large-scale infrastructure should be seen as a complement, rather than an alternative to smaller-scale generation such as rooftop PV and maturing tidal technology. It is a reality that, even if rooftop PV generation capacity was greatly expanded across the country, it would not provide enough power either to meet current or projected future demand without a similar deployment of large-scale infrastructure.</p> <p>As set out in the Planning Statement, National Policy Statement for Electricity Networks Infrastructure (EN-5) states that the security and reliability of the UK’s energy supply, both currently and in the future, is heavily dependent on an electricity network that will allow for generation, storage, and interconnection infrastructure to meet the required rapid increase in electricity demand for the transition to net zero.</p>	<p>N</p>

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Support	The new site of the converter station and the cable route have less impact on residents than the old one.	538;847. (Cat 3)	This is noted.	N
Community Benefit				
Ecological benefits	Planting woodland, floodplain management, wildflower meadows, hedges, support village halls, wildlife and gardening education in schools.	946. (Cat 3)	<p>Issues relating to ecological enhancement and additional habitat creation as understood at this stage are set out in Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>The Proposed Development is not subject to a mandatory net gain requirement under the Environment Act 2021. Nevertheless, the Applicants have engaged with statutory consultees to discuss the approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit.</p> <p>The Applicant's approach to biodiversity enhancement is also set out in section 1.8 within Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>This includes habitat creation at the Converter Site, including features which increase connectivity with habitat features beyond the site. This also provides mitigation habitat for protected species such as dormice, bats and breeding birds. This approach is also present in habitat creation areas to be formed in blocks to either side of the Torridge Estuary and further hedgerow enhancements along the HVDC cable route.</p> <p>The establishment of landscaping and ecological enhancement will be managed in accordance with the Landscape and Ecology Management Plan (LEMP), developed in accordance with the Outline Landscape and Ecology Management Plan (Document Ref: 7.10) provided with the DCO application.</p>	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Community benefits	<p>Support village halls.</p> <p>Gardening education in schools</p>	946. (Cat 3)	<p>This is noted and has been addressed in the Application.</p> <p>The Applicant has committed to the implementation of a Community Benefit Fund, and this was communicated to Torridge District Council and Devon County Council in a meeting on 4 October 2024. The fund will be managed by an independent grant making body. The Applicant will re-engage with relevant community groups and initiatives regarding community funding once a fund is established. The precise allocation of funds and benefits will be for further assessment following community engagement and the Applicant cannot form a view at this stage on the items suggested for possible funding.</p> <p>We are exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, including through the establishment of a community benefit fund. The precise allocation of funds and benefits will be for further assessment following community engagement and the Applicant cannot form a view at this stage on the items suggested for possible funding.</p> <p>We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway.</p>	N
Support	Anything is better than burning fossil fuels.	1041. (Cat 3)	This is noted.	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
<p>Local energy benefits</p>	<p>Cheaper electricity for social housing.</p> <p>Cheaper electricity for light industry to attract more companies to the area.</p>	<p>1041. (Cat 3)</p>	<p>We are exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, including through the establishment of a community benefit fund. The Applicant will re-engage with relevant community groups and initiatives regarding community funding once a fund is established. The precise allocation of funds and benefits will be for further assessment following community engagement and the Applicant cannot form a view at this stage on the items suggested for possible funding.</p> <p>The Proposed Development would supply electricity to the National Grid. Electricity supply to households is managed separately by domestic energy suppliers, via the electricity distribution network. As such, the Applicant is not able to provide a local electricity discount as part of the Proposed Development.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our recent statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p> <p>We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway.</p>	<p>N</p>

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
<p>Community benefits</p>	<p>'We founded a charity called Wings South West that works with disadvantaged people with one site in Abbotsham only a few hundred metres from the incoming cables. Wings is the closest of all charities and community groups to the Project and we would expect some direct financial benefits for it and the people it serves.'</p>	<p>275; 1015 (Cat 3)</p>	<p>The Applicant has committed to the implementation of a Community Benefit Fund, and this was communicated to Torridge District Council and Devon County Council in a meeting on 4 October 2024. The fund will be managed by an independent grant making body. The precise allocation of funds and benefits will be for further assessment following community engagement and the Applicant cannot form a view at this stage on the items suggested for possible funding.</p> <p>The Applicant will re-engage with relevant community groups, including charities such as Wings, regarding community funding once a fund is established.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our recent statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p> <p>We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway.</p>	<p>N</p>

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Transport	Improve public transport locally – help fund the trainline from Bideford to Barnstaple.	897 (Cat 3)	<p>The Applicant has committed to the implementation of a Community Benefit Fund, and this was communicated to Torridge District Council and Devon County Council in a meeting on 4 October 2024. The fund will be managed by an independent grant making body. The precise allocation of funds and benefits will be for further assessment following community engagement and the Applicant cannot form a view at this stage on the items suggested for possible funding.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development.</p> <p>We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway.</p> <p>The scope of the community benefits package will be developed through local voice and consultation with key stakeholders. At this early stage the focal areas of the fund have yet to be identified and refined through this iterative process.</p>	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Construction (general)				
Cumulative impacts	<p>We understand from the consultation booklet that following earlier iterations of the project development and layouts, that the bipole east converter hall has been located further south and east to the position it is now located. This change has led to the project having a direct impact on the solar farm.</p> <p>An area of land within the north west of the solar farm has now been included in the Order Land and you propose to compulsorily acquire temporary use of land and permanent land rights within land occupied by the solar farm. It appears that the land required will accommodate the HDD drilling compound and underground cables.</p> <p>The project has the potential to have serious detrimental impact on the operation of the solar farm. Any physical interference, even to a small area of the solar farm could have a significant impact on the operation overall and give rise to financial loss for which the Company would seek to be compensated for. The effect of vibration and dust created by HDD operations or the significant amount of earth moving proposed could interfere with operations and affect the performance and output of the solar farm.</p> <p>Without further information relating to the operations proposed and the protections to be afforded to the solar farm we have an in principle objection to the inclusion of any land within the solar farm being included in the Order Limits and for the location of the HDD compound being located adjacent to the solar panels.</p>	113; 114 (Cat 1&2)	<p>The Onshore HVDC cable connection into the Converter Site, and the Converter site layout has been altered, which will avoid the need to HDD under the Cleave 5MW solar farm. As such, land associated with the solar farm is no longer included within the Proposed Development's Order Limits.</p> <p>Dust mitigation measures are detailed in the Outline Dust Management Plan included with the Outline Onshore CEMP (Document Ref: 7.7).</p> <p>The Applicant will engage with the solar farm development throughout construction to identify any operational concerns for the solar farm during the Proposed Development's construction period.</p>	Y

Topic	Summary of comments	Reference	Response	Design change (Y/N)
<p>Construction noise and traffic</p>	<p>Particular concerns of mine include the noise and dirt coming from the works road due to be built 50 metres from my house on Gammaton Road. Also, how any work to widen the road is going to affect the water run-off. This crosses my land and already floods it in the winter months. Recently a lorry scraped one of the roadside banks which caused a waterfall onto the road whenever it rained. I am also worried that the project will end up taking longer than estimated, I will already be nearing 70 by the time it is meant to finish. 10 years is a long time to put one's life on hold when it is at this end.</p>	<p>211.(Cat 3)</p>	<p>Full details of the construction noise and vibration assessment are provided in Volume 2, Appendix 6.2: Construction Noise and Vibration, of the ES (Document Ref: 6.2.6.2).</p> <p>Measures to manage construction noise and vibration are set out in the Outline Onshore CEMP (Document Ref: 7.7). Example measures and the typical losses achievable by these measures have been included in the assessment based on the guidance in BS 5228-1:2009+A1:2014.</p> <p>The impact of the Proposed Development on hydrology, flood risk and drainage is considered in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).</p> <p>In regard to highways improvements located within Flood Zone 3, these elements of development relate to junction upgrades and road widening and are expected to tie into existing ground levels. Drainage requirements will be assessed as part of the detailed design of the proposed highways works to ensure that widening works do not increase the risk of flooding to existing properties. The highway design requires approval by Devon County Council and the Council's drainage specialists will be consulted as part of the design development.</p> <p>The Outline On-CEMP (Document Ref: 7.7) contains information regarding surface water management during construction. If required, additional drainage will be installed to ensure the existing flow pathways are maintained during and after construction. The Outline On-CEMP forms part of the DCO application, and a full on-CEMP(s) will be developed in accordance with the Outline On-CEMP.</p>	<p>N</p>

<p>Construction noise and traffic</p>	<p>This project will continue to affect my family and I through disruptive noises, dust and dirt, safe road access, loss of opportunity and property devaluations. The project itself we believe to be a great project, however the effect this will have on us due to the location will cause major effects on our lives for many years.</p>	<p>684. (Cat 3)</p>	<p>The Applicant has identified this property as a key sensitive receptor that is likely to be affected during the operation of the Gammaton Road construction compound. The Applicant will work closely with the residents to design and implement mitigation measures within the construction compound to minimise impacts on this property. This includes working with the residents to review:</p> <ul style="list-style-type: none"> • the location and height of proposed hoarding or temporary bunds to minimise visual and noise impacts. • the siting of the temporary compound access to minimise road safety concerns with access to the compound • temporary and permanent highway works on Gammaton Road to address road safety concerns. • siting of compound facilities such as the offices and welfare and the car park to minimise noise impacts associated with the daily operation of the compound. <p>Full details of the construction noise and vibration assessment are provided in Volume 2, Appendix 6.2 of the ES: Construction Noise and Vibration.</p> <p>Measures to manage construction noise and vibration are set out in the Outline CEMP. Example measures and the typical losses achievable by these measures have been included in the assessment based on the guidance in BS 5228-1:2009+A1:2014.</p> <p>Air quality impacts resulting from increases in dust are assessed within sections 7.10 to 7.12 of Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7). Increases in noise pollution are considered within Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6).</p> <p>A Dust Management Plan (DMP) will be prepared prior to construction, in accordance with the Outline DMP (Document Ref: 7.9) that forms part of the application for development consent.</p>	<p>N</p>
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Topic	Summary of comments	Reference	Response	Design change (Y/N)
			The Outline DMP comprises suitable measures based upon the IAQM dust guidance (IAQM, 2024).	
Construction compound location	Where you propose to build your site entrance, we are soon to be requesting our own site entrance on our side for the field entrance as we are looking at plans to develop this into a childcare setting/ workshop facilities/ holiday chalets. We have been discussing ideas that we will be putting forward to the local council once we know the exact plan of how we will execute this. The proximity of the construction compound will impact what is possible here and therefore our career paths.	684. (Cat 3)	<p>This is noted.</p> <p>The location of the construction site entrance will consider existing entrances on Gammaton Road to ensure that the site entrance is safe for workers, residents and other road users.</p> <p>It is anticipated that construction access to the Converter Site would be routed from the A39, which connects to Barnstaple Street and then Manteo Way.</p> <p>An illustration of access routes can be found in Volume 1 Figure 3.7: Construction Access Route Plans of the ES.</p>	N
Construction hours	Request to avoid all construction work between 6pm and 9am	684. (Cat 3)	<p>The outline Construction Environment Management Programme (On-CEMP) has been submitted with the DCO application as Document 7.7.</p> <p>Core working hours would be Monday to Friday 07:00-19:00 and Saturday 07:00-13:00. No working would be undertaken on Sundays or Bank Holidays, except in exceptional circumstances. These hours are consistent with standard working hours for other large scale construction projects.</p> <p>Up to an hour before and after the normal construction working hours, there would be mobilisation and demobilisation activities.</p>	N

<p>Construction compound location</p>	<p>Request not to build the construction compound at Gammaton Road in its proposed location if at all possible</p>	<p>684. (Cat 3)</p>	<p>The Applicant understands the concerns raised by the resident in relation to the location of the Gammaton Road compound which sits directly opposite their property.</p> <p>The Applicant will work closely with the residents to design and implement mitigation measures within the construction compound to minimise impacts on this property. This includes working with the residents to review:</p> <ul style="list-style-type: none"> • the location and height of proposed hoarding or temporary bunds to minimise visual and noise impacts • the siting of the temporary compound access to minimise road safety concerns with access to the compound • temporary and permanent highway works on Gammaton Road to address road safety concerns • siting of compound facilities such as the offices and welfare and the car park to minimise noise impacts associated with the daily operation of the compound. <p>The Applicant notes that reasons for the selection of the Gammaton Road construction compound included:</p> <ul style="list-style-type: none"> • Requirement for a suitably sized site near the Converter Site to: <ul style="list-style-type: none"> ○ minimise the need for storage, vehicle parking and worker facilities at the Converter Site, thereby minimising the overall size of the Converter Site. ○ minimise the distance HGV and AILs need to travel between a main compound and the Converter Site. ○ Connection to the onshore HVDC cable corridor to facilitate connection to the haul road, removing the need for HGVs and AILs to use local country lanes to access the Converter Site. ○ The size of the site facilitates the establishment of appropriate mitigation measures on the boundary of the site to minimise potential noise and visual impacts associated with the temporary compound. 	<p>N</p>
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Topic	Summary of comments	Reference	Response	Design change (Y/N)
			<ul style="list-style-type: none"> ○ Close proximity to a main road to minimise the distance travelled by HGV and AIL on narrow country lanes. ○ Small number of residential properties located within close proximity to the proposed site. ○ Support of use by the landowner, mitigating the need to use CPO powers for the use of the land. <p>The Applicant considered other field areas on the eastern side of River Torridge, connected to the onshore HVDC cable corridor but notes that these areas would have still required access via Manteo Way, and would require HGV access down Tennacott Lane.</p> <p>Compounds in these areas would also be closer to a larger number of residential properties, particularly the new housing development proposed south off Hillcrest Road (accessed via Gammaton Road).</p> <p>The Applicant is not aware of other suitably sized sites that meet the requirements for the main construction compound and are located within close proximity to public transport and note that during discussions with Council no other potential sites were forthcoming which may be suitably close to public transport links.</p>	

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Cable installation				
Ecological impacts	The construction of the onshore cables will cause disruption to the environment, wildlife, and geology.	946. (Cat 3)	<p>Habitat enhancements and mitigations are discussed in Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>The design of the Proposed Development includes mitigation measures to avoid, minimise and compensate for impacts on ecology and nature conservation. The Proposed Development design has taken into account the hierarchy of mitigation actions, which include the following:</p> <ul style="list-style-type: none"> • the avoidance of Important Ecological Receptors (e.g. diversion of the Onshore HVDC Cable Corridor to avoid Littleham Wood); • where complete avoidance is not possible, measures have been included to minimise and mitigate impacts (e.g. reduction in construction corridor width when crossing Devon hedgerows, use of trenchless methods to minimise impacts on habitat features such as wooded streams); • compensation for unavoidable impacts (e.g. full like-for-like replacement of hedgerows impacted by corridor); and enhancement measures (e.g. enhancement of hedgerows and additional tree planting at selected locations along the Onshore Infrastructure Area). <p>As set out in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3), the landfall and associated Offshore HVDC Cables will be installed by HDD. The HDD will pass beneath the SSSI.</p>	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Noise and dust pollution	Concern about disruption, dust, noise near Treetops, EX39 5HD.	466. (Cat 3)	<p>An assessment of dust generated during the construction and decommissioning phases is considered in Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7), in sections 7.10 and section 7.12, respectively.</p> <p>Mitigation measures are outlined in Table 7.21 of this chapter, which would be implemented during construction and decommissioning to ensure that impacts from dust are reduced to levels that are not significant in EIA terms.</p> <p>As such, this chapter concludes that there would be no significant effects arising from the Proposed Development.</p> <p>Noise during the construction phase of the Proposed Development is assessed in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6). The impact of noise related to installing the cable corridor landward of the transition joint bay are considered in Section 6.10.</p> <p>The magnitude of impact from HDD works at Landfall is therefore expected to be high at Treetops, and medium at the remainder of the receptors shown in Table 6.24 of the ES chapter.</p> <p>Treetops is also assessed to be subject to medium impacts from vibration related to construction activities. However, the assessment of vibration impacts has been undertaken based on worst-case assumptions from the boundary of the construction compound.</p> <p>It is likely the vibratory works will be undertaken at a greater distance than that which has been assessed and thus vibration impacts are likely to be lower than predicted.</p>	N
Support	The alternations to the road junction near Treetops, EX39 5HD will be great improvement as it is currently an accident black spot.	466. (Cat 3)	This is noted.	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Cable route	Explanation for the reason that the Proposed Development Draft Order Limits at the Cornborough Range landfall site is so much wider for so far beyond the HDD Compound and an assurance that this area will not be used for any other purposes such as workers accommodation.	274; 282. (Cat 3)	<p>An assessment of the landfall location for the Proposed Development is included in the landfall report appended to Volume 1, Chapter 4: Needs and Alternatives Chapter in the ES.</p> <p>The Applicant confirms the landfall site will not be used for worker accommodation. The Applicant is not proposing any worker accommodation within the Order Limits.</p> <p>The Proposed Development will implement Horizontal Directional Drilling (HDD) techniques at the landfall, which will avoid any interaction with the coastal cliffs, the beach and the intertidal area. Apart from in the event of an emergency there will be no activities or presence on the intertidal area. The HDD will extend out to at least beyond 5 metres permanent water depth (Lowest Astronomical Tide). Volume 1, Figure 3.9: Indicative Landfall HDD Exit Locations of the ES presents indicative locations of the HDD exits in the offshore environment.</p> <p>The proposed Order Limits widen offshore, compared to onshore, to account for the wider offshore cable corridor. A wider offshore corridor is required to allow separation distance between the two Bipoles, and flexibility for micro-routing e.g. around archaeological exclusion zones and on approach to crossings of existing cables.</p>	N
Construction impacts	Allow access to the west (i.e. seaward side of the drilling site) between the coast path fence and your drilling compound fence for Mr. Lomas, the landowner. This will enable him to move livestock and vehicles from his land on both sides of your perimeter fencing. This would benefit his access to all his fields to the south and gain him more pasture rather than such a thin strip between your fence and mine. It will also benefit us by being less obtrusive.	274; 282. (Cat 3)	<p>The western boundary of the proposed landfall compound will finish at the existing Public Right of Way, as shown in the Works Plan (Document Ref: 2.3).</p> <p>XLinks will work with landowners to give access between fields as much as is reasonably practicable from a safety perspective.</p>	

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Cable route	Cable Crossing the Ephemeral Watercourse (ditch) as described by the Environment agency on the eastern boundary of the Old Racecourse, Abbotsham. This is close to and downstream of our septic tank, the outfall of which has discharged into this ditch for over 100 years and gives us concern for the impact your work will have on its performance. Adding to the usual flow in wet weather it will cause your trenching to fill and flood and you should consider drilling under the ditch instead and crossing at the most northerly point that is feasible and further away from our boundary and septic tank.	274; 282. (Cat 3)	This is noted. The design of Onshore HVDC cable route will take into account any existing field drainage and potential for flood risk. An Onshore CEMP will be developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7) to manage any construction impacts, including site drainage.	
Cable route	To bring the cables along the north side of the ridge that runs through the middle of the old racecourse site in an east to west direction.	274; 282. (Cat 3)	The location of the Onshore HVDC cable corridor will be confirmed during detailed design. It is noted that the anticipated route will run north of the middle of the old racecourse site.	
Cable route	A new access corridor has been added adjacent to our eastern boundary since your first Consultation earlier in the year. We are told that this maybe required to provide your necessary electricity for the works at the landfall site that we overlook. Does this mean that you will now want to run telegraph poles the length of our eastern and northern boundaries and create a further eyesore? Will it require a 3-Phase supply?	274; 282. (Cat 3)	The corridor referred to has been identified as a potential low voltage connection point to supply power to the landfall site. The Applicant has two options for electricity supply that it is considering which are shown on the Works Plans (Document Ref: 2.3). The connection from the existing 11kV pole would be undergrounded to the landfall site if used. The Applicant understands that the current supply is single phase, and we would work with NGED to upgrade this to three phase if the connection is required.	
Consultation				
Consultation	The consultation questionnaire should be easier. The consultation questionnaire is not good – there should be more box-ticking.	1041. (Cat 3)	The consultation questionnaire used an open text box format to enable the public to respond flexibly and to encourage detailed responses to inform the design.	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Consultation	Consultee has not been informed about a cable crossing on their land at Bowood Farm in Abbotsham.	8; 9; 116; 117.(Cat 1&2)	<p>The consultees were contacted as part of the consultation as an S42(d) Category 1 or 2 stakeholder.</p> <p>The Onshore HVDC cable corridor crosses farmland on the opposite side of the road from Bowood Farm. The Applicant has proposed a temporary low voltage electrical connection from an existing 11kV pole east of the Bowood Farm buildings to the proposed construction compound opposite Bowood Farm. This would require a temporary underground connection along the boundary of the Bowood Farm, noting that the actual connection point will need to be confirmed with NGED.</p>	N
Consultation	Is there not a site for a compound with better access and away from the field which is in an area designated as an 'Area of Outstanding Natural Beauty'.	8; 9; 116; 117. (Cat 1&2)	<p>We empathise with the impacts felt by the nearest neighbours to the construction compound next to the A39.</p> <p>We have located the compound as close as possible to the A39 to minimise impacts on those residents and road users further from the A39.</p>	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
<p>Future engagement</p>	<p>To date, we feel the engagement with landowners has been poor, inconsistent and at times combative. We would expect this to be much more transparent and take into account each individual landowners' unique circumstances.</p> <p>We would expect that the Planning Inspectorate require you to demonstrate how you propose to deal with Landowners in a much more constructive way and ensure that you are held to account and don't abuse the powers they could bestow upon you.</p>	<p>41; 43.(Cat 1&2)</p>	<p>We have been through a consultative process with the majority of affected landowners, seeking to meet individually and listen to the concerns of landowners regarding the potential impacts of the project. Some of these concerns share common themes, others reflect the unique context for specific landowners. We have sought to address these concerns through a series of meetings with landowner representatives and are now in the advanced stages of agreement with the majority of landowners. For those landowners who have expressed opposition to the project crossing their land, this process is inevitably slowed.</p> <p>We have met with this landowner on two occasions at their property, as well as on three other occasions during public consultation and community meetings. After meeting with the landowner and after further communication through his land agent, the proposed cable route was amended to move the location where it crossed the A39 more than 200m further west to address concerns he expressed about the cable route crossing into land that he believed may have commercial value for development.</p>	<p>N</p>
<p>Cumulative impacts</p>				
<p>Cumulative impacts</p>	<p>This scheme should not be considered in isolation but should be combined with the landfalls required for the proposed White Cross and Atlantic Array Offshore Floating Wind Farms in a unified seamless scheme. These piecemeal proposals will disrupt all the residents and businesses of both North Devon and Torridge District Councils, not to mention the Tourist Industry, for possibly the next 10 to 15 years!</p>	<p>274; 282. (Cat 3)</p>	<p>We understand local concern regarding the cumulative effect of developments in the North Devon region. We are working to minimise as far as possible the effects on local communities, and our Environmental Statement outlines a series of mitigations to reduce this impact during construction, operation and decommissioning.</p> <p>Assessments of the cumulative effects of the Proposed Development alongside other developments are considered where relevant in every chapter of the Environmental Statement.</p> <p>Lists of developments which have been considered cumulatively can be found in Appendix 5.3: Cumulative Effects Assessment Screening Matrix of the ES (Document Ref: 6.1.5.3). Both onshore</p>	<p>N</p>

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
			<p>and offshore elements of the White Cross project are listed in the matrix and screened in for cumulative effects assessment.</p> <p>The Applicant notes that the Atlantic Array Offshore Wind Farm has not been taken forward. In relation to the White Cross Offshore Wind Farm, the White Cross project requires a different connection point to the national grid and as such it has not been possible to coordinate a combined landfall.</p> <p>The cumulative effects of the Proposed Development alongside other proposed developments in the North Devon region are considered in each ES Chapter.</p> <p>Cumulative effects from other onshore and offshore developments in the area, including the NGET substation, were assessed in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3) and predicted to result in effects of negligible or minor significance. The only exception to this is the cumulative impact on the tourism economy, which has been assessed as moderate (adverse) because the cumulative demand for workforce accommodation could result in a higher level of displacement of tourists.</p>	
Ecology				

Topic	Summary of comments	Reference	Response	Design change (Y/N)
<p>Ecological impacts</p>	<p>There will be a detrimental effect on the local Wildlife and on our enjoyment of it. We see deer, foxes, stoats, rabbits, herons, curlews, lapwings, geese, ducks, hawks, owls, woodpeckers, jays, swallows, partridges, pheasants, in addition to the more common species all of which will be adversely affected by this work and contribute to our loss of enjoyment of our home. No doubt the offshore drilling and the jack up barge will equally affect the marine wildlife particularly crabs, lobsters and prawns on our rocky foreshore.</p>	<p>274; 282. (Cat 3)</p>	<p>Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1) considers impacts on wildlife and woodland habitats.</p> <p>Overall, significant impacts have only been predicted to occur on dormouse and bat populations and mitigation strategies have been outlined in the above chapter. For bat, these include a lighting strategy aimed at reducing the impact on bat populations, and the necessity for protected species licensing when any trees likely to host roosting bat is being removed.</p> <p>Mitigation strategies will be in place for all protected species identified as present in the Proposed Development, including bats, dormice, badgers, otters, breeding and migratory birds, reptiles and aquatic invertebrates.</p> <p>The Onshore CEMP (Document Ref: 7.7) will include measures to minimise impacts on ecology, including wildlife during the construction phase of the project in accordance with the measures set out in the Outline Onshore CEMP (Document Ref: 7.7).</p> <p>Potential impacts to the marine environment are assessed in Volume 3, Chapters 1-9 of the ES, with measures proposed to mitigate any impacts. Following mitigation, all residual impacts to the marine environment are assessed as being not significant in EIA terms.</p>	<p>N</p>

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
<p>Biodiversity Net Gain</p>	<p>Any hedges, trees removed should be re-planted tenfold. There should be a biodiversity net gain in biodiversity of at least 50% - 10% is not enough.</p>	<p>946. (Cat 3)</p>	<p>Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1) considers impacts on wildlife and woodland habitats. An Outline Landscape and Ecology Management Plan (LEMP) has also been developed as part of the application for development consent.</p> <p>Where existing hedgerows are impacted by the Proposed Development, they will be reinstated, and the Applicant has identified areas where hedgerow enhancement can be implemented.</p> <p>The Proposed Development is not subject to a mandatory net gain requirement under the Environment Act 2021. Nevertheless, the Applicants have engaged with statutory consultees to discuss the approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit.</p> <p>The Applicant's approach to biodiversity enhancement is set out in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), in Section 1.8. This includes habitat creation at the Converter Site, including features which increase connectivity with habitat features beyond the site. This also provides mitigation habitat for protected species such as dormice, bats and breeding birds.</p>	<p>N</p>

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Ecological impacts	It will cause massive disruption to onshore ecology.	946. (Cat 3)	<p>Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1) addresses impacts on wildlife and ecology.</p> <p>Overall, significant impacts have only been predicted to occur on dormouse and bat populations and mitigation strategies have been outlined in the above chapter. For bat, these include a lighting strategy aimed at reducing the impact on bat populations, and the necessity for protected species licensing when any trees likely to host roosting bats are being removed.</p> <p>Mitigations for the impact on dormouse include placing “dead-hedging” (creating a row of interconnected branches forming a continuous furrow) across gaps in hedgerows during periods when regular construction activity is not being undertaken. This should remain in place during all such periods and should also remain in place until hedgerow establishment is achieved. This should be in addition to measures such as weaving branches into the top section of Heras fence panels.</p> <p>The Onshore CEMP will include measures to minimise impacts on ecology, including wildlife during the construction phase of the project in accordance with the measures set out in the Outline Onshore CEMP (Document Ref: 7.7).</p>	N
Flood risk & hydrology				
Impact on angling	The lake site (grid SS 488 246) is environmentally and people friendly. 'We offer local support, and education within the angling community 'Loss of water supply would have a major impact on the site, and local angling as a whole.'	1203. (Cat 3)	<p>An assessment of potential impacts on existing watercourses and waterbodies is provided in Volume 2, Chapter 3: Hydrology and flood risk (Document Ref: 6.2.3).</p> <p>There were no significant impacts identified to existing field drainage or other ordinary watercourses that supply water bodies such as the lake referenced.</p>	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Flood risk	During periods of rain the field drainage at the location of the Gammaton Road construction compound is not very good and there is often a heavy stream of water flowing out of the field onto the road.	684. (Cat 3)	<p>Creation of compounds will include installation of drainage and attenuation appropriate to the site context.</p> <p>It is recognised that water currently emanates from land south of Gammaton Road including from a spring opposite Woodville Farm.</p> <p>Proposals for construction drainage will be the subject of further consultation and agreement with DCC and Environment Agency prior to construction.</p> <p>Construction drainage proposals will be part of the final Onshore Construction Environmental Management Plan (Document Ref: 7.7) that will be submitted for approval prior to construction.</p>	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Ground conditions, hydrology and geology				
Groundwater	<p>Lake site/fishery (grid SS 488 246) – relies on springs located close to the cable route. Concerned that groundwater 'would/could be diverted along the cable trunking/trenches thus diverting away from our fishery', having a 'catastrophic' effect on the fishery and the ecosystem. Could the borehole that provides our groundwater to the lower lake become contaminated? Concerned about wider contamination and the effect on wildlife. What is the duration and timings of work?</p>	1203. (Cat 3)	<p>The lake is located within an area where no potential contaminant sources have been identified and the potential for pollutant linkages to become active is low. Details are provided within Volume 2, Appendix 4.1: Desk Top Study, Preliminary Risk Assessment and Site Reconnaissance of the ES (Document Ref: 6.2.4.1).</p> <p>Run off will be managed through the implementation of measures identified within the Onshore CEMP and Pollution Prevention Plan (PPP), which will be developed in accordance with the Outline Onshore CEMP and Outline PPP (Document Ref :7.7).</p> <p>The HVDC cable will be installed up to 1.5m below the existing ground surface within a trench, with a target depth of 1.4m.</p> <p>The dewatering of open cut trenches and excavations will have a direct impact on shallow groundwater levels and flow. Any potential impacts are anticipated to be short term and localised in nature.</p> <p>Groundwater levels will recover after construction assuming that the excavated materials are used as backfill and are not subject to artificial compaction. This will be controlled through the On-CEMP.</p>	

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Human health				
Mental health	This project is causing us untold anxiety, mental anguish and concerns as well as many sleepless nights and this is only the beginning! In addition, when I need further heart surgery or we suffer any other health problems, our options will be severely limited.	274; 282. (Cat 3)	<p>We empathise with the impacts felt by the nearest neighbours to the construction compound and converter station. Thorough communication with local residents and stakeholders will continue throughout development and construction.</p> <p>We recognise that the prospect of being impacted by this change is stressful and can cause anxiety. In order to mitigate this, we will be maintaining communications with residents throughout the development process, construction and operation of the project.</p> <p>We will continue to engage with the landowner and will seek to mitigate impacts where possible.</p> <p>The human health impacts of the Proposed Development, including mental health, are set out in Volume 4, Chapter 4: Human Health of the ES (Document Ref: 6.4.4).</p> <p>Mitigation measures adopted as part of the Proposed Development pertaining to human health are outlined in section 4.8 of the ES chapter.</p> <p>An Outline Onshore Construction Environmental Management Plan (Outline On-CEMP) has been developed and will be submitted with the DCO application to mitigate the impacts of construction on residents.</p>	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Mental health	This project is already having a significant effect on my family and I. Loss of sleep, missing work for multiple meetings, showing people around our home and the time it has taken for us to accumulate all the information we can and research our rights and laws surrounding this project.	684. (Cat 3)	<p>We empathise with the impacts felt by the nearest neighbours to the construction compound and converter station. Thorough communication with local residents and stakeholders will continue throughout construction.</p> <p>We recognise that the prospect of being impacted by this change is stressful and can cause anxiety. In order to mitigate this, we will be maintaining communications with residents throughout the development process, construction and operation of the project.</p> <p>The human health impacts of the Proposed Development, including mental health, are set out in Volume 4, Chapter 4: Human Health of the ES (Document Ref: 6.4.4).</p> <p>Mitigation measures adopted as part of the Proposed Development pertaining to human health are outlined in section 4.8.</p> <p>An Outline Onshore Construction Environmental Management Plan (Outline On-CEMP) has been submitted with the DCO application to mitigate the impacts of construction on residents.</p>	N
Human health	Concern over the effect of electricity at the converter station site, e.g. noise, unknown effects on health, wildlife. What research has been done on the effect of magnetic and electric fields on health, 'can cause infertility, childhood leukaemia, and other effects.'	946. (Cat 3)	<p>The human health impacts of the Proposed Development are set out Volume 4, Chapter 4: Human Health of the ES (Document Ref: 6.4.4), including electric and magnetic fields exposure, acknowledging that actual risks are unlikely to be significant for public health.</p> <p>Mitigation measures adopted as part of the Proposed Development pertaining to human health are outlined in section 4.8 of the ES chapter.</p> <p>Electromagnetic fields are mitigated by adhering to the International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines and Government voluntary Code of Practice on EMF public exposure (Department for Energy Security and Net Zero, 2012; ICNIRP, 1998, 2010).</p>	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Landscape and visual Impact				
Cable route	<p>'Our property, Bowood House in Abbotsham, is directly adjacent to the largest site for holding vehicles, materials and drilling along the whole cable route.' Resident had intended to construct and sell a property on their land and use the sale to finance a tourism business. The plans are now in jeopardy due to XLinks as is the viability of their new business. They claim their privacy is being infringed upon, and have concerns regarding the impact of noise, vibration, and visual impact.</p>	275; 1015 (Cat 3)	<p>Bowood House is opposite the A39 construction compound and as such would be directly affected by mitigation measures taken on this aspect of the development. In order to further reduce impacts from the HDD operations on nearby designated sites or other sensitive receptors, the construction works sites and HDD compounds would be screened with appropriate fencing or screening to act as a visual and sound barrier.</p> <p>Where reasonably practicable, measures would be taken to contain and limit the visual intrusion of the onshore construction sites, including the temporary compounds.</p> <p>The impact of construction noise is considered in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6).</p> <p>The predicted sound impact on the receptor at Bowood Farm predicted to be 49dB and is assessed to be of medium duration with a low magnitude of impact. There are no properties which are predicted to be subjected to high or medium noise impacts during the construction phase of or the Construction Compounds.</p> <p>Where possible, the location and layout of the compounds (e.g. siting of welfare facilities) would be designed to avoid overlooking residential properties. Layout plans of the construction compounds would be provided, showing any sensitive areas and buffer zones (e.g. ecological habitats or protected species), and areas where storage of potential pollutants (e.g. fuels, oils and other chemicals) would be avoided.</p>	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
<p>National Landscape</p>	<p>'Although a right of view is not a given, when it comes to an AONB (which this proposed XLinks Abbotsham site is on) we had reasonably assumed that we would be 'safe' and the status would be protected.' [Bowood House] Although long term the visual impact seems as if it would be minimal, the ongoing drilling and storage facilities will have a major impact for a number of months'</p>	<p>275; 1015 (Cat 3)</p>	<p>The potential visual impacts on the North Devon Coast National Landscape (formally AONB) during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>The potential construction noise and vibration impacts are assessed in Volume 2.</p> <p>We understand concerns from residents relating to temporary construction impacts associated with the proposed construction compound north of the A39 at the Abbotsham Cross roundabout. The compound will be used by staff during the construction of the Onshore HVDC Cable Corridor.</p> <p>Appropriate measures to minimise the visual impacts and other construction phase impacts of the compound will be agreed with Torridge District Council through their approval of the Onshore Construction Environmental Management Plan (CEMP). This CEMP will be developed in accordance with the requirements of the Outline Onshore CEMP (Document Ref: 7.7). This may include appropriate hoarding around the perimeter of the compound to minimise visual impacts of works within the compound.</p> <p>The works near Bowood House also include a proposed HDD or other trenchless drilling technique to facilitate the crossing of the onshore HVDC Cables across the A39. The Applicant is working through opportunities to locate the entry pit for the crossing on the southern side of the A39, thereby minimising construction related impacts on Bowood House associated with the crossing works.</p> <p>We note that as the temporary construction compound is only required for the Onshore HVDC Cable Corridor works, it will only be in place for the duration of those works.</p>	<p>N</p>

Topic	Summary of comments	Reference	Response	Design change (Y/N)
<p>National Landscape</p>	<p>The visual impact on us at the Old Racecourse, Abbotsham, and the effect on our enjoyment of our house for at least 8 years, including concern about impact on privacy and to views over the AONB.</p>	<p>274; 282. (Cat 3)</p>	<p>The potential visual impacts during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>The Applicant notes that the construction programme at the landfall is not eight years. The anticipated duration of works at the landfall site (Old Racecourse) would be in three separate phases (duct installation, Bipole 1 cable pulling and Bipole 2 cable pulling). During the interim periods our intention is for the compound to be minimised as much as practicable in order to reduce visual impacts during periods of inactivity.</p> <p>No fabric of the coastal landscape would be impacted, as the coastal area would be crossed using HDD. There would be a temporary impact on coastal views, as the construction works at the Landfall would, in part, take place from the barge located in the sea. The direct impact on coastal views would be of local geographic extent, short-term and temporary.</p> <p>There would be a temporary impact on seaward views, as the construction works at the Landfall would, in part, take place from the barge located in the sea. The direct impact on coastal views would be of local geographic extent, short-term and temporary.</p> <p>There would be a temporary impact of views from elevated land towards the landfall and Onshore HVDC Cable Corridor within the North Devon Coast NL. The direct impact on inland views would be of local geographic extent, short-term and temporary.</p> <p>There would be a temporary impact on tranquillity as the construction works at the Landfall take place from the barge located in the sea and the works at the landward side, at the transition joint bays and construction compounds would also be visible. The direct impact on tranquillity would be of local geographical extent, short-term and temporary.</p>	<p>N</p>

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Light pollution	Light pollution from the drilling compound and the offshore jack-up barge all night and from the trenching and cabling works during the winter working hours.	274; 282. (Cat 3)	<p>The potential visual impacts during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>As outlined in the Statutory Nuisance Statement (Document Ref: 7.6), trenchless/HDD drilling or piling could be required outside of the assumed daytime construction hours (i.e. evening, Sundays, Bank Holidays or at night), which will be agreed upon with the relevant planning authority prior to these works, as set out in the outline onshore CEMP.</p> <p>If night-time operation is required, the closest residents to the works shall be notified of the start and completion of the works.</p> <p>The Outline On-CEMP includes details regarding construction lighting measures. Construction site lighting would only operate when required and would be designed, positioned and directed to avoid unnecessary illumination of adjacent properties, sensitive ecological receptors and users of public footpaths. Where necessary, light shield guards would be used to prevent light spill. Construction lighting will be controlled by the Onshore Construction Environmental Management Plan (CEMP) which will be prepared in accordance with the Outline Onshore CEMP (Document Ref: 7.7) which has been submitted as part of the DCO application.</p>	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Fencing	The fencing and trenching adjacent to the north boundary of the Old Racecourse, Abbotsham, is moved further away to improve our aspect. Any reduction in height will therefore be less obtrusive and to use a generic post and pig wire low stock proof fence would be preferred instead of such a high fence particularly as there are no security issues here. The landowner would then gain more pasture rather than a useless thin strip for the whole length of his field and we will benefit from not having to look at such a high eyesore so close to our house	274; 282. (Cat 3)	<p>We note landowner concerns in relation to fencing requirements for the compound and will take them into consideration during the planning for the temporary compound.</p> <p>We note that both security and safety considerations for workers and the public will be taken into account by the Construction Contractor in the determination of site fencing requirements, as well as regard for visual impacts from surrounding areas.</p> <p>The construction requirements for the landfall (and other) compounds will be confirmed through the Onshore CEMP which will be developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7).</p>	
Fencing	Consideration of reduced height fencing to all of the remaining old racecourse field to lessen its detrimental impact generally.	274; 282. (Cat 3)	<p>The potential visual impacts during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>We note landowner concerns in relation to fencing requirements for the HVDC cable corridor and will take them into consideration during the planning for the security for the cable corridor.</p> <p>The construction phase fencing requirements along the will be confirmed through the Onshore CEMP by the Construction Contractor in accordance with the Outline Onshore CEMP (Document 7.7).</p>	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Visual impact	Concern about the view of the site.	684. (Cat 3)	<p>The Applicant has identified this property as a key sensitive receptor that is likely to be affected during the operation of the Gammaton Road construction compound. The Applicant will work closely with the residents to design and implement mitigation measures within the construction compound to minimise impacts on this property, with a particular focus on noise and visual impacts. This includes working with the residents to review:</p> <ul style="list-style-type: none"> • the location and height of proposed hoarding or temporary bunds to minimise visual and noise impacts • the siting of the temporary compound access to minimise road safety concerns with access to the compound • temporary and permanent highway works on Gammaton Road to address road safety concerns • siting of compound facilities such as the offices and welfare and the car park to minimise visual and noise impacts associated with the daily operation of the compound. <p>Construction works will be managed through an Onshore CEMP, developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7)</p> <p>The visual impact of the Proposed Development is assessed and considered in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2). This chapter includes a range of mitigation measures to lessen the landscape and visual impacts.</p>	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Other issues				
Electro magnetic fields	Do underground cables affect the land with electric and magnetic currents? What research has been done on this?	946. (Cat 3)	<p>Operation and maintenance of the offshore and onshore cables and converter stations would produce EMFs due to the voltage and flow of current through electrical infrastructure.</p> <p>The UK Government (DECC, 2012) has adopted the 1988 Guidelines for Limiting Exposure to Electromagnetic Fields produced by the ICNIRP (ICNIRP, 1988). This guidance was subsequently updated in the form of the 2020 Guidelines (ICNIRP, 2020).</p> <p>EMF strengths drop rapidly with distance from the source. The distances will depend on voltage but, in general, the strength of a magnetic field is well within international guidelines within a few metres. Underground cables do not produce an external electric field at ground level due to the shielding of the cable sheath and burial material.</p> <p>All of the electrical infrastructure associated with the offshore and onshore elements of the Proposed Development would be designed to comply with current guidelines,</p> <p>As a result of the risk posed by EMF onshore, EMF was scoped out of the environmental assessment for onshore elements. This was agreed by the Planning Inspectorate in consultation with statutory environmental bodies such as the Environment Agency and Natural England.</p> <p>EMF is considered within the offshore ES chapters for benthic ecology (Document Ref: 6.3.1), fish and shellfish (Document Ref: 6.3.2), commercial fisheries (Document Ref: 6.3.4), marine mammals and turtles (Document Ref: 6.3.5) and shipping and navigation (Document Ref: 6.3.6), but the relevant assessments determined that EMF did not pose a significant risk in EIA terms.</p>	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Carbon impact	This is not a green project.	946. (Cat 3)	<p>Volume 4, Chapter 1: Climate Change of the ES (Document Ref: 6.4.1) sets out the assessment of effects in relation to climate change. Climate change in this context refers to the long-term shifts in temperatures and weather patterns that are fundamentally driven by human activities.</p> <p>Assessment as part of the Environmental Statement concludes that avoided GHG emissions resulting from the displacement of higher emitting electricity generation sources, are enabled by the Proposed Development. This would result in a significant beneficial effect in EIA terms.</p>	N
Land use	<p>We write on behalf of the Ford family, more specifically Richard and Kenneth Ford who own and farm land at Webbery Barton (our client). The proposed project is intended to be located on a significant area of land that is owned by our client, namely the location of the main converter stations and associated infrastructure.</p> <p>Our client is currently in negotiation with XLinks regarding the involvement of its land in the project. Our client is aware that through the Development Consent Order (DCO) process XLinks may seek powers of compulsory acquisition which could affect our client's land. Our client's current intention is to seek to resolve any issues with XLinks directly without the need to make any further formal representation on the proposal. However, our client reserves its position in this respect and maintains its right to make further comments on the proposed application at a future date, either direct to XLinks or through the DCO process via a Relevant Representation.</p>	Joint response on behalf of 104; 105; 106; 107; 151; 152; 153; 154. (Cat 1&2)	<p>The Applicant has continued discussions with the landowners at the Converter Site and welcomes the intention of seeking to resolve issues without resorting to compulsory purchase powers. We note the position with regard to making further commentary on the DCO application.</p>	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Property value	<p>'Our house sale has fallen through solely because of XLinks - we have sent all related paperwork confirming this and our proposals by email to hello@xlinks.co today (26th June 2024) following our meeting with Matthew Rose and James Humfrey'</p>	407; 506. (Cat 3)	<p>The Applicant has been in contact with a number of landowners who have raised concerns about impacts on the ability to sell their properties. This is an ongoing process and the Applicant is reviewing these on a case by case basis. We will continue to engage with landowners to understand and look to resolve any concerns they have prior to and during the construction of the project to minimise potential impacts on their ability to sell properties.</p>	
Property value	<p>This scheme has immediately put a blight on our property in the event that we wish to or are forced to sell up until the time that your project is either refused a DCO or completed and operational. This will be a minimum of at least 8 years, even by your optimistic calculations and by when we will be 83 and 84 years old! This is now enormously reducing the value of our property.</p> <p>We also obtained planning permission last year to extend the house, build a double garage and add a swimming pool but have now had to put these plans on hold because of your scheme.</p> <p>Equally we would be unable to rent the property over the time scales as above and even if we moved out, the house and gardens would still need maintaining and bills covered.</p> <p>Compensation sought for this and legal costs.</p>	274; 282. (Cat 3)	<p>The Applicant has met with this landowner twice at his property and also at a public information event. The landowner expressed their concern at the impact of the landfall and cable route works and their concern that they would be impacted by eight years of works was addressed several times by the Applicant to clarify that the construction period referred to is not eight years.</p> <p>While we acknowledge the potential for impacts during the construction period, these impacts are temporary and restricted to the construction phase of the project, noting that there will be periods in between the HDD and associated cable duct installation and cable pulling activities when there are no construction works on site.</p> <p>We will continue to engage with the landowner and will seek to mitigate impacts where possible.</p> <p>Construction activities will be managed in accordance with an Onshore CEMP developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7)</p> <p>We note that the Proposed Development does not impact upon the ability for the landowner to complete works on their own property.</p>	

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Compensation	What would be the level of compensation we would be offered and what additional guarantees will we receive for any overruns in time for this multistage project? We are all aware of the many problems of both the construction and financing of major projects, such as HS2, and the inevitable delays that can occur.	274; 282. (Cat 3)	<p>The Applicant has had ongoing engagement with this landowner and is aware of their concerns in relation to compensation.</p> <p>We will continue to engage with the landowner and will seek to mitigate impacts where possible.</p>	
Funding	This is an uncoordinated private scheme without Government financial backing. It will be financed predominantly by Middle Eastern and Chinese money which presents further potential instabilities and dangers.	274; 282. (Cat 3)	<p>The project is privately funded, and details of this can be found in the DCO Funding Statement (Document Ref: 4.2).</p> <p>The Project has received development investment from a number of leading industry participants including TAQA, TotalEnergies, Octopus Energy, GE Vernova and the Africa Finance Corporation, amongst others.</p> <p>As with other low-carbon generation projects in the UK seeking project finance, it is anticipated that a Contract for Difference (CfD) will be in place to provide revenue security from the UK government.</p> <p>The Applicant is currently in discussions with the UK government in relation to a bilaterally agreed CfD.</p>	N

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<p>Energy security</p>	<p>It is coming from a predominantly Sunni Muslim state at a time that we are supporting Israel in their war against the predominantly Sunni Muslim state of Gaza and even when peace is finally achieved, the UK will still be at the mercy of Morocco, itself, not the most democratic or stable state.</p>	<p>274; 282. (Cat 3)</p>	<p>The Proposed Development can bring clean reliable power to the UK, on a dedicated supply, with the involvement of Morocco, a long-standing UK partner. Morocco has become, over the last 10 years, an international leader in renewable energy. Morocco's National Energy Strategy, which has a focus on the deployment of renewable generation, was launched in 2008. Morocco offers an attractive and stable investment climate. Multiple international power companies have invested successfully in the Moroccan energy market, including TAQA of the United Arab Emirates, ACWA Power of Saudi Arabia, TotalEnergies, Engie and EDF of France, and Siemens of Germany. And while we believe that we should maximise the UK's domestic renewables opportunity, it is a fact that a more diverse mix of reliable, affordable and green power is key to keeping the UK running in the coming years as our energy system, transport and homes become increasingly electrified, and demand for electricity continues to grow.</p> <p>A lot of power is already imported into the UK, including 20% of electricity demand in in Q2 2024. The recent development of new electricity connections with other countries allows for the import and export of electricity as a complement to domestic generation capacity.</p> <p>The Proposed Development is needed so that the Project's international generation assets can enable an energy system that meets the Government's objectives to create a secure, reliable, and affordable energy supply for consumers to security of supply. Aggregated generation output from wind, solar, and storage is more predictable, less variable, and more flexible than output from a single generation technology, providing security and reliability of supply benefits for consumers. The power generated as part of the Project would complement the energy we already generate from the sun and wind in the United Kingdom. When domestic renewable energy generation in the UK drops due to low winds and short periods of sun, the Project can provide access to the</p>	<p>N</p>
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Topic	Summary of comments	Reference	Response	Design change (Y/N)
			<p>benefits of long hours of sun and consistent winds in Morocco to provide a firm but flexible source of zero-carbon electricity.</p> <p>The inclusion of a 22.5GWh/5GW battery facility in Morocco means this energy would be reliably available when it's most needed in Great Britain. The Morocco-UK Power Project will be an important contributor to a well-balanced grid. The Project offers an international solution to bringing forwards decarbonisation, energy security, and affordability benefits also ascribed to nationally significant infrastructure.</p>	

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<p>Cable protection</p>	<p>Vulnerability of such a long undersea pipeline from attack or sabotage by President Putin, etc</p>	<p>274; 282. (Cat 3)</p>	<p>The proposed cable protection methods are described in Volume 1, Chapter 3 Project Description of the ES.</p> <p>Safety and security standards will be similar to subsea cable projects operated by others such as National Grid. We have undertaken rigorous and robust security and safety reviews on the project, which are informing the design process.</p> <p>Based on the initial assessment of the geotechnical and geophysical survey data as part of an Outline Cable Burial Assessment (CBRA) (Document Ref: 6.1.3.4) the cables will be buried along the entire route. For 220 km of the 371km route in UK waters it is anticipated that the cables will be protected by trenching and covered by natural sediments. It is anticipated that additional protection would be required along approximately 150 km of the route in UK waters.</p> <p>Where the cable cannot be buried at cable crossings or on account of the bed characteristics, cable protection in the form of a rock berm or concrete mattresses would be required.</p> <p>A lot of power is already imported into the UK, including 20% of electricity demand in in Q2 2024. This project helps to bring clean reliable power, on a dedicated supply, with a long-standing UK trade partner. And while we believe that we should maximise the UK's domestic renewables opportunity, it is a fact that we will need a more diverse mix of reliable, affordable and green power is key to keeping the UK running in the coming years as our energy system, transport and homes become increasingly electrified, and demand for electricity continues to grow. The Morocco-UK Power Project will be an important contributor to a well-balanced grid.</p> <p>It is noted that the sabotage on the Nord Stream gas pipeline was undertaken in International Waters. The Offshore Cable Corridor sits within UK, French, Spanish, Portuguese and Moroccan waters and none of the cable corridor sits in International Waters. It is also noted that a lot of power is already imported into the UK via</p>	<p>N</p>
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Topic	Summary of comments	Reference	Response	Design change (Y/N)
			subsea cables, for example through interconnector cables within the North Sea.	
Consenting process in other countries	Why is there no mention in the Consultation Process of the projected completions of both ends of this scheme, namely the Moroccan Solar/Wind constructions and the National Grid UK infrastructure constructions upcountry. This would give the residents and businesses in North Devon the assurances that they will not be left with all this disruption for many further years and suffer from any delays that these may cause.	274; 282. (Cat 3)	<p>The Project is securing the relevant consents and permissions in every jurisdiction that it is operating in, including Morocco, Portugal, Spain, France and the United Kingdom.</p> <p>Details on the consenting process in other countries is provided in Other Consents and Agreements (Document Ref: 7.21).</p> <p>For the Morocco components of the Proposed Development, two Environmental and Social Impact Assessments (ESIAs) (Generation site and Onshore cable) are now under preparation. The team is now working on the preparation of all the required documents for the permitting process.</p> <p>With respect to the National Grid, the Project has secured a connection agreement at Alverdiscott and assessed the likely cumulative impacts of the NGET works. NGET have confirmed they will be developing and applying separately for the permissions for their works.</p>	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Property value	<p>Our nice countryside views will be ruined and although the site will be put back to its original state after the project is complete this will still ruin the property character during this time. At any point during the project if we wanted to sell the property its value will be a lot less than it would if the project wasn't there. The risk of it staying and being built upon or setting precedent for future development will also permanently decrease our homes value.</p>	684. (Cat 3)	<p>The Applicant has identified this property as a key sensitive receptor that is likely to be affected during the operation of the Gammaton Road construction compound.</p> <p>We are aware of the landowner's concerns with regards to potential impacts on future land value. We note their comment with regard to compensation.</p> <p>The Applicant is in communication with the landowner to establish the context of his concerns and is seeking to address these concerns and will continue to engage with them throughout the application and construction phases.</p> <p>The Applicant will work closely with the residents to design and implement mitigation measures within the construction compound to minimise impacts on this property.</p> <p>Construction works will be managed through an Onshore CEMP, developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7)</p> <p>As the landowner acknowledges the impacts on the landscape are temporary and once completed, the land will be returned to its previous state in consultation with the landowner.</p>	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Property value	Our property will decrease in value due to the increased use of the road if the road was to be widened and during the 10-year process of works, if the property needed to be sold during this time this would decrease the value significantly. It also sets a precedence that if you can build there and we have to put up with it for many years, then others could build there devaluing the property further.	684. (Cat 3)	<p>We are aware of and have discussed the landowner's concerns in regard to widening of the whole of Gammaton Road.</p> <p>The Applicant does not intend to widen the full extent of Gammaton Road, however as the detailed design for proposed 'pinch point' widening has not been completed, we need to retain the relevant rights to widen the road to support the future transit of ALL loads to the Converter Site along Gammaton Road.</p> <p>We have also raised the concerns of local residents on a fully widened Gammaton Road with Devon County Council as the relevant highway authority, noting the likely objection of residents to widening the length of Gammaton Road.</p> <p>We will continue to engage with local residents along Gammaton Road as the detailed design for highways works on Gammaton Road progresses to ensure that we include the local voice in any discussions with Devon County Council as the approval authority of our proposed highways works.</p>	N
Compensation	Compensation sought for loss of business due to disruption of Gammaton Road; loss of property value under Land Compensation Act 1973 Part 1; inconvenience and anxiety; loss of holiday let potential; loss of rental potential if land interest or child died.	684. (Cat 3)	<p>We are aware of the landowner's concerns with regards to potential impacts on future land value. We note their comment with regard to compensation.</p> <p>The Applicant is in communication with the landowner to establish the context of his concerns and is seeking to address these concerns and will continue to engage with them throughout the application and construction phases.</p>	N
Compensation	Funds requested for adaption to child's bedroom to avoid disturbance; soundproofing southern elevation of the home; window cleaner; vehicle protection.	684. (Cat 3)	We will continue to engage with the landowner with regard to appropriate measures to mitigate potential construction impacts due to their proximity to the proposed Gammaton Road compound.	

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Compensation	<p>We believe a reasonable compensation amount to cover the inconvenience to our lives, to compensate for the distress and anxiety this is causing us and to ensure our quality of life is not affected by this project. To prepare our property to protect our home and to be able to live alongside this development and to set a precedence that anyone who wishes to make a further development on this land after this project is complete will have to compensate. To cover the financial loss of the property due to devaluation. We believe a reasonable compensation amount to be a total of £500000. This would cover the property/land/potential devaluation also to cover preparations for our home to be protected and for us to be able to live alongside this development and overall nuisance/loss of amenity etc including cleaning services to keep up with property maintenance issues caused by the project and the remaining funds as a compensation for the distress, lack of sleep and anxiety this has caused.</p> <p>Request to offer me a substantial sum (Cira £1.5M and buy me out of my property allowing enough time to buy/build a new property suitable for my family's needs in particular child 5's.</p>	684. (Cat 3)	<p>We are aware of the landowner's concerns with regards to potential impacts on future land value. We note their comment with regard to compensation. The Applicant is in communication with the landowner to establish the context of his concerns and is seeking to address these concerns and will continue to engage with them throughout the application and construction phases.</p>	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Property value	<p>My wife and I spent several years looking for our perfect home, where she could pursue her passion for horses. Eventually, back in 1995, we were lucky enough to find this farm in an idyllic location. Now, I love where I live, but sadly my wife passed away recently and I have been faced with the choice of continuing to live in a place I love, and affords me a modest income, or to sell up and downsize hoping to have enough money left to afford a pension. To be honest it is a hard decision, I love where I live but, I know I am going to struggle with the work involved in the coming years. The XLinks project seems to take both these choices off the table. If I was able to sell the farm at all I am not going to get market value for it and staying here will be akin to living in the middle of a building site</p>	211.(Cat 3)	<p>We recognise that the prospect of change is stressful and can cause anxiety. In order to mitigate this, we will be maintaining communications with residents throughout the development process, construction and operation of the project.</p>	N
Cumulative impact	<p>Could the introduction of HV cable effect the solar generation we have on site?</p>	1203. (Cat 3)	<p>The Onshore HVDC cable corridor will be buried along its length and as such does not have a direct impact on solar generation which is obviously above ground.</p> <p>The Proposed Development does require the removal of a portion of the newly constructed solar farm west of the Alverdiscott Substation Site. The Applicant is continuing engagement with the developer of this site.</p>	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Noise and vibration				
Construction noise	Concern regarding noise near Littleham road due to 24/7 construction work.	428.428. (Cat 3)	<p>The assessment of construction noise impacts is provided in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6).</p> <p>As outlined in the Statutory Nuisance Statement (Document Ref: 7.6), trenchless/HDD drilling or piling could be required outside of the assumed daytime construction hours (i.e. evening, Sundays, Bank Holidays or at night), which will be agreed upon with the relevant planning authority prior to these works, as set out in the outline onshore CEMP.</p> <p>If night-time operation is required, the closest residents to the works shall be notified of the start and completion of the works, as set out in the outline onshore CEMP. The HDD plant would be installed and operated such that noise levels do not exceed a level of 45dB LAeq at the closest neighbouring noise-sensitive locations during night-time operation. Depending on the plant used, location, pit depth, etc., this may require the use of acoustic screening using temporary solid barriers with a height of at least that of the drilling equipment located in proximity (around 10m or less) of the trenchless drilling work.</p> <p>Construction works including proposed working hours, will be managed through an Onshore CEMP, developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7).</p>	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
<p>Converter station noise</p>	<p>'We would like a simulation of the daily operational noise that the plant [converter station] will generate. We live less than 1/2 mile away.'</p>	<p>244. (Cat 3)</p>	<p>The noise impacts associated with the operation of the Converter Site are assessed in Volume 2, Chapter 6: Noise and Vibration (Document Ref: 6.2.6). The assessment identified in Tables 1.4 and 1.5 of Volume 2, Appendix 6.3 Operational Noise that the operational noise levels would be negligible with the operational noise levels of the operational equipment lower than the existing background noise levels.</p> <p>The result of the operational noise assessment reported in Table 6.35 of the ES Chapter concludes there would be a negligible impact on the property in question.</p> <p>We note that the landowner raised this request during the statutory consultation events, and we advised that we would ask the technical noise specialists from our environmental assessment team whether this simulation could be accurately undertaken.</p> <p>Unfortunately, the feedback from the technical specialists was that it would be impossible to accurately simulate operational noise from the Converter Site.</p>	<p>N</p>

Topic	Summary of comments	Reference	Response	Design change (Y/N)
<p>Converter station noise</p>	<p>The converter station will cause noise.</p>	<p>946. (Cat 3)</p>	<p>Noise impacts associated with the construction of the converter station are considered in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6), Section 6.10. Based on this analysis, the impact is predicted to be of local spatial extent, medium-term duration, and the magnitude of impact is predicted to be low.</p> <p>Noise impacts associated with the operation of the converter station are considered in Section 6.11 of the ES chapter. The magnitude of effect is predicted to be negligible, as adopting the assumed mitigation measures results in operational noise levels which do not exceed the background sound levels.</p> <p>The following noise control measures will be considered in the design of the converter stations:</p> <p>The orientation and layout of the converter stations will be considered in order to minimise noise levels at nearby receptors. Quieter equipment will be selected, where available and practicable and mitigation measures such as acoustic barriers and enclosures will be specified where necessary.</p> <p>Electrical equipment to convert DC to AC is housed within a building reducing the external noise impact.</p> <p>Landscaped bunds will be constructed around the Converter Site as part of the landscape, visual and noise mitigation required to mitigate potential impacts. These are an inherent mitigation feature for the site and aid to screen receptors from operational noise.</p>	<p>N</p>

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Converter station	The converter station will cause disruption to the environment and wildlife.	946. (Cat 3)	<p>Effects of the construction and operation of the converter station are assessed in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), Sections 1.10-1.12.</p> <p>An indicative landscape masterplan is included in the Outline LEMP (Document Ref: 7.10) for the Converter Site. This masterplan will be confirmed during detailed design. The intent of the masterplan is to maximise areas of woodland habitat suitable for mitigation for important protected species such as dormice and bats.</p> <p>Temporary and permanent habitat loss of improved grasslands, spoor semi-improved grasslands and arable lands as a result of construction of the Converter Site are of minor adverse significance (not significant in EIA terms), and all temporary losses at the Converter Site would be reinstated in the long term through landfall mitigation managed in accordance with the LEMP .</p>	N
Construction noise	We are immediately downwind of your landfall site with prevailing winds coming from the South West to the North West and only some 500 metres distant. Noise pollution-(a) (hopefully only in a normal working week and hours) during the months and years that you are in the racecourse erecting your fencing, excavating your 2 trenches, forming a road, laying the ducting, pulling the 4 cables through, refilling the sub soil, refilling the top soil, removing the fencing and making good. (b) This pales in comparison to the 24-hour underground drilling for some 12-24 months that you have now advised us that you will seek to bring the undersea cable ashore and connect it to the land cable.	274; 282. (Cat 3)	<p>An assessment of noise generated during the construction phase of the Proposed Development is provided in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6).</p> <p>Construction works will be managed in accordance with the Onshore CEMP which will be developed in accordance with the Outline Onshore CEMP (Document Ref:7.7).</p> <p>As outlined in the Statutory Nuisance Statement (Document Ref: 7.6), trenchless/HDD drilling or piling could be required outside of the assumed daytime construction hours (i.e. evening, Sundays, Bank Holidays or at night), which will be agreed upon with the relevant planning authority prior to these works, as set out in the outline onshore CEMP.</p> <p>If night-time operation is required, the closest residents to the works shall be notified of the start and completion of the works.</p>	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Traffic noise	At nighttime with the extra traffic using the road and the accessibility of the road there will be an increased number of headlights glaring into the house, and this will cause a permanent noise from the road, permanently changing the character of our properties location and therefore devaluing the property. This would particularly have huge effects for 4 of our children's bedrooms that are next to the road. Currently the road is barely used after 5:30-6:00pm.	684. (Cat 3)	<p>We are aware of and have previously consulted with the landowners on their concerns with regard to the proximity of the Gammaton Road construction compound to their property. We note that standard working hours are 07:00 to 19:00 and that the site is to be demobilised each day within the hour after 19:00.</p> <p>Construction works will be managed in accordance with the Onshore CEMP which will be developed in accordance with the Outline Onshore CEMP (Document Ref:7.7). The standard mitigation proposed at the Gammaton Road compound would include appropriate site set out of both the car park and site entrance to minimise impacts on the adjacent property, including light spill from compound lighting and vehicle access.</p> <p>The operation of the construction compound is temporary and as such would not have a permanent impact on the property.</p>	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
<p>Traffic noise</p>	<p>Throughout the process of this site being built, there will be an increased amount of traffic using the road at many different hours of the day, causing disruptions to use because of noise from the road and safety when using the road. This will again cause more dust to blow towards our property.</p> <p>The building of the actual site will cause a lot of noise disruption and unsociable hours will cause our family to be disrupted.</p> <p>Child 1, 3, 4 and 5's bedrooms are facing directly to the site causing disruption to their sleep and due to child 5's disabilities this will have a significant effect to his day to day living causing seizures if he does not get enough sleep or if his sleep is disrupted.</p>	<p>684. (Cat 3)</p>	<p>We are aware of and have previously consulted with the landowners on their concerns with regard to the proximity of the Gammaton Road construction compound to their property. We note that standard working hours are 07:00 to 19:00 and that the site is to be demobilised each day within the hour after 19:00.</p> <p>Construction works will be managed in accordance with the Onshore CEMP which will be developed in accordance with the Outline Onshore CEMP (Document Ref:7.7). The standard mitigation proposed at the Gammaton Road compound would include appropriate site set out of both the car park and site entrance to minimise impacts on the adjacent property, including light spill from compound lighting and vehicle access.</p> <p>A Dust Management Plan (DMP) will be prepared prior to construction, in accordance with the Outline DMP (Document Ref: 7.9) that forms part of the application for development consent. The Outline DMP comprises suitable measures based upon the standard industry dust guidance (Institute of Air Quality Management (IAQM) dust guidance (IAQM, 2024)).</p>	<p>N</p>

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Construction noise and dust	<p>The noise, dust and dirt will create a limited use to our outdoor spaces particularly during half terms and summer holidays in the day time. We will not want to be outside playing with our children if our nice peaceful rural environment that they currently play safely in will be disrupted. The dust and dirt coming from the site will cause the children's play equipment to be dirty. If the site is noisy and dusty then child 5 will not be able to use our outside spaces which will cause him to be frustrated and unhappy, it will reduce his quality of life as he loves to be outside. This may result in us having to take the children out more, which comes at an increased cost of fuel and potential cost of activities.</p>	684. (Cat 3)	<p>We are aware of and have previously consulted with the landowners on their concerns with regard to the proximity of the Gammaton Road construction compound to their property. We note that standard working hours are 07:00 to 19:00 and that the site is to be demobilised each day within the hour after 19:00.</p> <p>Construction works will be managed in accordance with the Onshore CEMP which will be developed in accordance with the Outline Onshore CEMP (Document Ref:7.7). The standard mitigation proposed at the Gammaton Road compound would include appropriate site set out of both the car park and site entrance to minimise impacts on the adjacent property, including light spill from compound lighting and vehicle access.</p> <p>A Dust Management Plan (DMP) will be prepared prior to construction, in accordance with the Outline DMP (Document Ref: 7.9) that forms part of the application for development consent. The Outline DMP comprises suitable measures based upon the standard industry dust guidance (Institute of Air Quality Management (IAQM) dust guidance (IAQM, 2024)).</p>	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Noise and dust pollution and flood risk	Particular concerns of mine include the noise and dirt coming from the works road due to be built 50 metres from my house on Gammaton Road. Also, how any work to widen the road is going to affect the water run-off. This crosses my land and already floods it in the winter months. Recently a lorry scraped one of the roadside banks which caused a waterfall onto the road whenever it rained. I am also worried that the project will end up taking longer than estimated, I will already be nearing 70 by the time it is meant to finish. 10 years is a long time to put one's life on hold when it is at this end.	211.(Cat 3)	<p>Full details of the construction noise and vibration assessment are provided in Volume 2, Appendix 6.2: Construction Noise and Vibration, of the ES (Document Ref: 6.2.6.2).</p> <p>Measures to manage construction noise and vibration are set out in the Outline Onshore CEMP (Document Ref: 7.7). For instance, low speed restrictions will be agreed with the relevant highway authorities to reduce the amount of noise being generated.</p> <p>The impact of the Proposed Development on hydrology, flood risk and drainage is considered in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).</p> <p>Drainage requirements will be assessed as part of the detailed design of the proposed highways works to ensure that widening works do not increase the risk of flooding to existing properties. The highway design requires approval by Devon County Council and the Council's drainage specialists will be consulted as part of the design development.</p> <p>The Outline On-CEMP (Document Ref: 7.7) contains information regarding surface water management during construction. If required, additional drainage will be installed to ensure the existing flow pathways are maintained during and after construction. The Outline On-CEMP (Document Ref: 7.7) forms part of the DCO application, and a full on-CEMP(s) will be developed in accordance with the Outline On-CEMP (Document Ref: 7.7).</p> <p>We note that the construction time period is approximately six years and not 10 years as noted in this comment.</p>	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Socioeconomics and tourism				
Compensation	The proximity of cable works will affect the operations of a holiday let business at Bowood Farm in Abbotsham and undermine the value of the property. Compensation is sought.	8; 9; 116; 117. (Cat 1&2)	<p>We have previously and will continue to engage with the landowner in relation to their queries on potential compensation and mitigation measures to minimise potential impacts associated with the construction of the project. This may include use of the landowners' holiday let business to house construction staff and we will continue to engage with the landowner to determine whether this is an option to which they would be open.</p> <p>It is to be noted that following public consultation in which the views of the landowner and other residents in and near Abbotsham were heard, the route was changed which has significantly reduced the impact on the holiday lets in question.</p>	N
Property value	The proximity of a construction compound will undermine the value of Woodville Farm on Gammaton Road.	211.(Cat 3)	We will continue to engage with the landowner in relation to their queries on potential impacts on property value and mitigation measures to minimise potential impacts associated with the construction of the project. We note that the works are temporary and there are no operational impacts predicted to affect Woodville Farm.	N
Workforce accommodation	There is a lack of accommodation locally already, where will the new workforce be accommodated.	897. (Cat 3)	<p>We have prepared an Outline Accommodation Strategy which has been provided with the DCO application (Document Ref: 7.13). The Accommodation Strategy includes an assessment of various forms of accommodation within the Torridge and North Devon area and recommends suitable accommodation options to implement during the construction of the Proposed Development.</p>	N

Topic	Summary of comments	Reference	Response	Design change (Y/N)
Transport and Access				
Traffic increase	Concern about the increase in traffic on the A39 and Manteo Way during the construction periods. They are already under pressure from the new housing estates. Six years of worse air quality and disruption. Likelihood of more potholes.	897. (Cat 3)	<p>Potential traffic and transport impacts are considered assessed in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5).</p> <p>Anticipated construction traffic levels are listed in Table 5.26 which are reflective of the peak flow of trips into and out of the construction sites. However, it is not anticipated that the peak flow is maintained throughout the entire construction phase.</p> <p>A computer model has been used to assess the possible effect on queuing at the Barnstaple Street / Manteo Way junction. The results of the junction modelling assessment are set out in section 5.10 of the Traffic and Transport ES chapter.</p> <p>Our construction contractors will be required to repair any damage on roads associated with their construction works. We are also negotiating provision for an appropriate contribution to Devon County Council for road maintenance following the completion of the construction works to be applied to the wider road network in which the Proposed Development has operated during the construction phase. This will be agreed under a Section 106 agreement directly with DCC.</p> <p>The number of trips anticipated to be generated by the construction works fall below a threshold necessary to assess the possible air pollution effects of vehicle emissions but it does assess the risk of dust being spread by construction vehicle traffic.</p> <p>The results of that assessment is provided at Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7).</p>	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Safety	Proposed depot in a field off Littleham Road is dangerous due to vehicles being forced to turn into traffic on A386. Vehicles turning into Littleham Road will be forced to go across the grass verge.	428. (Cat 3)	We are proposing a junction upgrade at the junction of the A386 and the unnamed road to Littleham on which the proposed HDD compound is located for the River Torridge crossing. The timing of these works will be confirmed prior to the commencement of construction, noting that the detailed design for the proposed highway works will require approval from Devon County Council as the relevant highway authority. The junction improvements will be required to facilitate safe access into the compound and safe access onto the road to Littleham.	N
Safety	Lorry access to the compound area will be through an entrance off the minor road to Abbotsham opposite the driveway and access lane to Bowood Farm. This has major health and safety concerns as both us and our guests drive into and out of our driveway and access lane and any increase to the volume of the traffic will be dangerous. We would certainly need to advise guests to cease walking down the Abbotsham road to the nearest pub which is in the middle of the village. We were quoted as no more than 2-3 lorries a day by senior XLinks management but they were not prepared to confirm this in writing.	8; 9; 116; 117.(Cat 1&2)	<p>The access to the Cable Compound on the north side of the Abbotsham Cross roundabout, adjacent to Bowood House will be designed in accordance with relevant safety standards to ensure safe access and egress for construction vehicles and other road users. It is not clear why pedestrian access to Bowood Farm would no longer be appropriate and we would work with local residents to ensure that safe access to their properties is maintained.</p> <p>The potential traffic and transport impacts are assessed in Volume 2 Chapter 5: Traffic and Transport (Document Ref: 6.2.5). This includes an assessment of the proposed vehicle numbers at each of the compounds. We are not aware of any quotes of 2-3 lorries a day as this number is not consistent (nor has it ever been) with any assessments completed for the Proposed Development.</p>	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Safety	<p>With Gammaton Road being widened this will encourage users to go to higher speeds therefore causing concerns for pedestrians like ourselves using this road. Not only will there be increased traffic due to this project there will also be increased road users if this road was to be widened as this is a back road to many areas like Torrington and Umberleigh going as far as reaching South Molton through this road, the road being more user friendly will encourage more users.</p> <p>This is an extreme safety concern, and I would suggest/request if the road is to be widened at any point along Gammaton Road that the legal speed limit is permanently reduced to 30 and a pedestrian walkway is built to ensure the safety of all users.</p>	684. (Cat 3)	<p>We are aware of and have discussed the landowners concerns in regard to widening of the whole of Gammaton Road. The Applicant does not intend to widen the full extent of Gammaton Road, however as the detailed design for proposed 'pinch point' widening has not been completed, we need to retain the relevant rights to widen the road to support the future transit of AIL loads to the Converter Site along Gammaton Road.</p> <p>We have also raised the concerns of local residents on a fully widened Gammaton Road with Devon County Council as the relevant highway authority, noting the likely objection of residents to widening the length of Gammaton Road.</p> <p>We will continue to engage with local residents along Gammaton Road as the detailed design for highways works on Gammaton Road progresses to ensure that we include the local voice in any discussions with Devon County Council as the approval authority of our proposed highways works.</p> <p>The Applicant has no proposals to install a pedestrian walkway for the Proposed Development.</p>	N
Transport assessments	<p>We understand there have already been traffic tests completed on Gammaton Road, we believe when these were carried out one of the main roads were shut and Gammaton Road was used as a diversion route. We would suggest and request that new tests are carried out when this is not being used as a diversion route so that more accurate results can be obtained.</p>	684. (Cat 3)	<p>Traffic and Transport are considered in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5).</p> <p>For the purposes of this ES chapter, base traffic flows for the traffic and transport study area have been obtained from the publicly available sources set out in Table 5.12 and from undertaking site-specific surveys in the locations shown in Volume 2, Figure 5.8.</p> <p>The data obtained from the site-specific surveys is included in Volume 2, Appendix 5.1: Base Traffic Flow Data of the ES (Document Ref: 6.2.5.1).</p>	N

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Topic	Summary of comments	Reference	Response	Design change (Y/N)
Traffic	Gammaton Road to be changed to a permanent 30 mile an hour limit and a pedestrian walkway to be built.	684. (Cat 3)	<p>There are no proposals for permanent changes to speed limits or pedestrian facilities on Gammaton Road as they are not required for the operational development. Temporary widening and speed alterations are proposed on a short section of Gammaton Road between Manteo Way and the compound entrance near to Tennacott Lane.</p> <p>The Applicant has no proposals to install a pedestrian walkway for the Proposed Development.</p>	N

APPENDIX J-4: REGARD HAD TO STATUTORY CONSULTATION RESPONSES FROM CONSULTEES UNDER S47

Table J.4.1 below sets out responses to the statutory consultation from consultees under s47 of PA 2008 and the regard had to them by the Applicant. Where multiple responses containing the same comment have been received, these are addressed at the same time in table below. It should be read in conjunction with Section 7.3 of the Consultation Report (Document Ref: 5.1)

Table J.4.1 - Offshore: Summary of Section 47 responses and regard had by topic

Topic	Summary of comments	Response	Design change (Y/N)
Benthic ecology			
Sediment plumes	In the document it is recognised that the potential for sediment plumes during installation can affect water quality and aquatic life. However, specific measures to manage sediment plumes, such as using silt curtains or scheduling work to avoid sensitive periods for marine life, are not detailed. We would expect such approaches to be deployed.	<p>Refer to Volume 3, Appendix 8.1 Sediment Source Concentrations and Assessment of Disturbance of the ES (Document Ref: 6.3.8.1) for discussion of specific measures to be incorporated within the Proposed Development to manage impacts associated with sediment plumes. Based on consideration of seabed sediment particle size, currents, and secondary wave mixing, the inner portion of Bideford Bay has been identified as having the greatest potential for transport of any sediments disturbed by the proposed activities. Sediment transport potential is greatest during Spring tides and during periods of significant wave activity. The Proposed Development has made the following commitment (see Volume 1, Appendix 3.1: Commitments Register of the ES (Document Ref: 6.1.3.1)):</p> <p><i>OFF34: All potential sediment disturbance activities in Bideford Bay are to avoid peak spring tides and significant wave activity, to limit any potential for sediment mobilisation as far as reasonably practicable. These activities would include the excavation / sediment clearance at the HDD exit pits and trenching works.</i></p>	N

Topic	Summary of comments	Response	Design change (Y/N)
<p>Sediment plumes</p>	<p>The digging up of the marine bed to lay cables will pollute the sea and kill marine life.</p> <p>The disturbance of sediment will create mud movement and we have unique salt water corals which will never return.</p>	<p>Potential impacts to the marine environment are assessed in Volume 3, Chapters 1-9 of the ES, with measures proposed to mitigate any impacts. Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1) presents an assessment of potential effects on Benthic Ecology, including consideration of all benthic habitats along the route (and within a study area that has regard for potential pathways of impact). The Report to Inform Appropriate Assessment (RIAA) (Document Ref: 7.16) and the Marine Conservation Zone Assessment (Document Ref: 7.15) further consider and assess the potential for any impact on European Protected Habitats and Features of Conservation Importance. Following mitigation, all residual impacts to ecological receptors, including to benthic ecology, are assessed as being not significant in EIA terms (or the relevant European Site assessments above).</p> <p>All direct and indirect impact pathways have been considered. Of note, the project has committed (as listed in the Outline Offshore Construction Environmental Management Plan, Document Ref: 7.9) to micro-route cables to minimise any potential damage to Annex I geogenic reef habitats. Where potential for indirect disturbance is identified via e.g. sediment smothering, the specific sensitivity of species and habitats is considered and taken into account within impact considerations. The sediments across the Offshore Cable Corridor may be characterised broadly as sands (fine sands or coarser), with a very low percentage of fines across the route (mean 8.6% proportion of fines from Proposed Development baseline characterisation grab samples).</p> <p>Potential impacts on sediment disturbance from the Proposed Development are assessed in Volume 3, Chapter 8: Physical Processes of the ES (Document Ref: 6.3.8) as being not significant. Refer to Volume 3, Appendix 8.1 Sediment Source Concentrations and Assessment of Disturbance of the ES (Document 6.3.8.1) for discussion of impacts associated with sediment plumes.</p>	<p>N</p>

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Topic	Summary of comments	Response	Design change (Y/N)
Construction			
Seabed impacts	Digging into the seabed will damage and disrupt the marine environment.	Potential impacts to the marine environment are assessed in Volume 3, Chapters 1-9 of the ES, with measures proposed to mitigate any impacts. Specifically, Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1) presents an assessment of potential effects on Benthic Ecology, including consideration of all benthic habitats along the route (and within a study area that has regard for potential pathways of impact). The Report to Inform Appropriate Assessment (RIAA) (Document Ref: 7.16) and the Marine Conservation Zone Assessment (Document Ref: 7.15) further consider and assess the potential for any impact on European Protected Habitats and Features of Conservation Importance. Following mitigation, all residual impacts to the marine ecological receptors are assessed as being not significant in EIA terms.	N
Programme	Once work starts, we will see how the schedule can be maintained. Storms that hit the Devon coast can be brutal and will hinder the work.	The current UK cable lay schedule limits construction activities over the winter months, and allowances for weather have been made based on local historical weather data. The winter period is largely avoided – the provisional schedule excludes December to February inclusive for most activities except for some limited rock placement (which needs to follow earlier trenching works in sequence). Daily updated weather forecasts will be used to adjust plans / re-sequence work as required.	N

Topic	Summary of comments	Response	Design change (Y/N)
Pollution	<p>In the documents, it is stated that embedded measures against accidental pollution include an Offshore Construction Environmental Management Plan (CEMP) and compliance with MARPOL. While adhering to these measures is crucial, additional safeguards could include:</p> <ul style="list-style-type: none"> • Emergency spill response drills specific to the types of pollutants used in construction. • Increased frequency of equipment checks and maintenance to prevent leaks. • Implementing real-time water quality monitoring stations around construction zones to detect any accidental releases immediately. 	<p>An Outline Offshore CEMP is provided with the application for development consent (Document Ref: 7.9). Measures to prevent accidental pollution during construction of the Proposed Development will be further detailed in the Pre-Construction Offshore CEMP to be produced in accordance with the Outline Offshore CEMP (Document Ref: 7.9), which sets out requirements for environmental incident responses. The Pre-Construction Offshore CEMP will be developed post-consent by the construction contractor.</p>	N
Ecology - general			
BNG	Will BNG include offshore gain?	The Proposed Development is not proposing to include any marine net gain. This has been confirmed and agreed with Natural England.	N
Marine ecology	The proposals are not detrimental to marine life.	This is noted.	N
Cable laying	Digging up 2500 miles of ground under water to lay cables is not Eco friendly especially to the marine life.	<p>Trenches along the cable corridor are typically 1 metre wide by 1.5 metres deep along the offshore cable corridor. HDD techniques will avoid any interaction with the coastal cliffs, the beach and the intertidal area. An intertidal survey has been conducted to identify and map species and habitats across the intertidal (Volume 3, Appendix 1.1: Intertidal Survey Report; Document Ref: 6.3.1.1 of the ES).</p> <p>Potential impacts to the marine environment are assessed in Volume 3, Chapters 1-9 of the ES (Document Ref: 6.3.1-9), with measures proposed to mitigate any impacts. Following mitigation, all residual impacts to marine ecological receptors are assessed as being not significant in EIA terms.</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
<p>Biodiversity</p>	<p>I am concerned about the potential for disruption in the Marine Protected area. Cornborough shore is, according to my friend who helps survey, one of the richest for biodiversity in North Devon.</p>	<p>Trenchless installation techniques are proposed for use at landfall to avoid potential environmental impacts. HDD techniques will avoid any interaction with the coastal cliffs, the beach and the intertidal area. An intertidal survey has been conducted to identify and map species and habitats across the intertidal (Volume 3, Appendix 1.1: Intertidal Survey Report; Document Ref: 6.3.1.1 of the ES). The HDD will extend out to at least beyond 5m permanent water depth. The Offshore Cable Corridor has been routed carefully to avoid offshore Protected Habitats (amongst other considerations) and the habitats within the entire corridor area then mapped to inform micro-routing around sensitive habitats. Potential impacts from the Proposed Development to marine designated sites are assessed within the following documents:</p> <ul style="list-style-type: none"> • Volume 3, Chapter 1: Benthic Ecology of the ES (Document Ref: 6.3.1) • Volume 3, Chapter 2: Fish and Shellfish Ecology of the ES (Document Ref: 6.3.2) • Volume 3, Chapter 4: Marine mammals & Turtles of the ES (Document Ref: 6.3.4) • Volume 3, Chapter 9: Offshore Ornithology of the ES (Document Ref: 6.3.9) <p>The ES has concluded that there would be no significant impacts from the Proposed Development. In addition, a Habitat Regulations Assessment Report to Inform Appropriate Assessment RIAA (Document Reference 7.16) and Marine Conservation Zone (MCZ) Assessment (Document Ref: 7.15) have been submitted alongside the DCO application which include additional assessments of the potential impacts associated with the Proposed Development on specific marine protected areas.</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
Invasive Non-Native Species (INNS)	The document specifies adherence to best practice shipping guidelines, however we recommend that additional precautionary measures are adopted, such as regular monitoring for early detection of INNS and implementation of rapid response protocols to address any sightings of invasive species.	An outline Offshore Biosecurity Plan (Document Ref: 7.19) has been submitted alongside the DCO application, which will be revised and finalised ahead of construction by the construction contractor. The Plan assesses the potential risks of introduction of non-native species (NNS) during the construction, and operation and maintenance phases to minimise the risk of introduction and establishment of NNS as a result of Proposed Development activities, and to help prevent the spread of NNS already present within the Offshore Cable Corridor to new locations. The Plan includes details on biosecurity control measures, a contingency plan, and monitoring, site surveillance and reporting procedures to be followed by the construction contractor.	N
Environmental impacts	The cabling will be less damaging to the marine environment than offshore wind turbines.	This is noted.	N
Marine mammals			
Underwater noise	The current assessment and mitigation strategies appear to underestimate the potential impact on marine life, particularly for species with limited acoustic data like the leatherback turtle. Given the limited data on the species' acoustic sensitivity, it is important to implement more conservative measures and continuous monitoring to avoid unexpected disturbances.	<p>The potential impacts on turtles and other marine mammals are assessed in Volume 3 Chapter 4: Marine Mammals & Turtles of the ES (Document 6.3.4), and within the HRA Report to Inform Appropriate Assessment (Document Ref: 7.16).</p> <p>An underwater noise technical assessment (Volume 3 Appendix 4.1 of the ES; Document Ref: 6.3.4.1) was completed to assess the extent and potential for noise generation, with impacts on relevant marine life, including leatherback turtle presented in Volume 3, Chapter 4: Marine Mammals & Turtles of the ES (Document 6.3.4).</p> <p>There have been no significant noise effects identified.</p>	N

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Topic	Summary of comments	Response	Design change (Y/N)
Lundy SAC	Concern about Lundy marine safe zone. Harbour dolphins. These were protected in Atlantic Array Survey during offshore construction.	Due to the distance to Lundy Special Area of Conservation (SAC) no disturbance is expected. The closest point of the Offshore Cable Corridor to the Lundy SAC is 3.6 km. Impacts on harbour porpoises and other marine mammal species have been considered in Volume 3 Chapter 4: Marine Mammals & Turtles of the ES (Document 6.3.4) and within the HRA Report to Inform Appropriate Assessment (Document Ref: 7.16). It is of specific relevance that the Proposed Development includes no planned percussive noise sources, such as piling. Thus compared to offshore developments such as traditional offshore wind with turbine installations, the Proposed Development has very low predicted noise levels.	N

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Topic	Summary of comments	Response	Design change (Y/N)
<p>Underwater noise</p>	<p>Will lose our 'blue flag' status in Westward Ho! once work starts. No dolphin will want to come to Bideford bay with the work going on and surfers won't use Cornborough.</p>	<p>The potential impacts on marine mammals and turtles are assessed in Volume 3 Chapter 4: Marine Mammals & Turtles of the ES (Document 6.3.4) and within the HRA Report to Inform Appropriate Assessment (Document Ref: 7.16). The Environmental Statement finds no significant impacts on Marine Mammals as a result of the Proposed Development. Of particular note is that the Proposed Development will not include any percussive noise sources such as piling. Furthermore, the cable installation works will be highly transient with e.g. the cable lay vessel progressing at a speed of approximately 150 m/hr.</p> <p>There is not deemed to be any potential for the Proposed Development to affect the physical and chemical water quality status of the Westward Ho! Beach. There would be no influence on microbiological parameters.</p> <p>The extent of works in Bideford Bay would be very limited and highly transient, with the nearest offshore works situated approximately 1km offshore.</p> <p>The potential impacts on other marine users, including surfers are assessed in Volume 3 Chapter 6: Other Marine Users of the ES (Document Ref: 6.3.6). There are no construction activities proposed that would affect the ability of surfers to use known coastlines. Potential impacts on the North Devon World Surfing Reserve have been considered, and specifically any potential for impact on geomorphological features, and thus on surf breaks. There are no anticipated above seabed level 'structures' and the probability of using cable rock protection (below seabed level) is very low in Bideford Bay. There are no adverse impacts on surfing predicted as a result of the Proposed Development.</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
<p>Marine ecology</p>	<p>In the documents provided, it is stated that the effects of the construction, operational, and decommissioning phases on marine mammals and sea turtles are non-significant, thus no mitigation or further monitoring is required. However, no field-based studies have been undertaken, and there are no plans to do so. As stated in the document "A desk-based review is deemed sufficient to enable characterization of the baseline and to allow a robust assessment of the potential impacts on marine mammals and sea turtles. No further environmental investigations (e.g., site-specific surveys) are considered to be required." Despite this, some of the evidence used in the review is more than 10 years old, and these are highly mobile species whose distribution varies. We recommend that if no field study is undertaken to validate statements, then the precautionary approach should be adopted, and a monitoring plan developed to ensure that the impacts of the development on marine mammals and sea turtles are as insignificant as anticipated.</p>	<p>The potential impacts on marine mammals and turtles are assessed in Volume 3 Chapter 4: Marine Mammals & Turtles of the ES (Document 6.3.4) and within the HRA Report to Inform Appropriate Assessment (Document Ref: 7.16).</p> <p>The assessment was undertaken using data from the most recent SCANS survey conducted in summer 2022, in combination with densities reported in the management unit (area used by marine mammals). In addition, this was supplemented with wider data sets including local survey information for offshore developments to ensure that all species potentially impacted were considered and assessed. Given the size of the MU this allows the mobility of the animals and changing distributions to be taken into account. The size of the MU (and the associated massive range utilised by marine mammals), compared to the small footprint yet transient nature of the proposed works at any one location and time (trenching vessel for example will progress at c.150m/hr), means that marine monitoring survey would be highly unlikely to offer additional data or affect the approach to or the conclusions of the current assessment.</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
Lundy SSSI	<p>There is a potential threat to the wildlife, especially on Lundy. Lundy and our local areas are within a Marine Nature Reserve, an SSSI, an AONB, a Heritage Coast and a Special Area of Conservation. All of these categories have been put in place for a reason, because the area is so unique.</p> <p>The Area shown in the map is a Special Area of Conservation (SAC) This area has been identified as a winter area of importance for the Celtic and Irish Seas Management Unit of Harbour porpoises. Lundy has the harbour porpoise which is protected by Article 4 of the EU Habitats Directive (1992)</p> <p>It is now transposed into UK Law by the Conservation of Habitats and Species Regulations (2019).</p>	<p>Potential impacts on offshore ornithology (including birds associated with Lundy SSSI), are assessed in Volume 3, Chapter 9: Offshore Ornithology of the ES (Document Ref: 6.3.9), which concluded no significant impacts.</p> <p>Potential impacts on marine mammals and turtles are assessed in Volume 3 Chapter 4: Marine Mammals & Turtles of the ES (Document 6.3.4), which concluded no significant impacts.</p> <p>Potential impacts on Fish and Shellfish (including Lobster which are a listed feature of Lundy designations) are assessed in Volume 3, Chapter 2: Fish and Shellfish of the ES (Document 6.3.2), which concluded no significant impacts.</p> <p>It is noted that specific Lundy consultation discussions were undertaken with Natural England, and also with the Lundy Company Ltd (who have a lead and wide ranging role in the ongoing management of Lundy). Based on the consultations undertaken, there are no outstanding concerns from these consultees with respect to potential Lundy impacts.</p> <p>Further to the environmental statement chapter assessments, the Lundy SAC is assessed within the HRA Report to Inform Appropriate Assessment (Document Ref: 7.16) which concludes no Adverse Effect on Integrity of the habitats site.</p>	N
Noise and vibration			
Underwater noise	<p>The document states that no significant effects have been identified from the impact of underwater noise and vibration from construction activities, and thus no further monitoring is proposed. However, continuous monitoring during and after construction can help detect unforeseen impacts early and allow for adaptive management. This could include acoustic monitoring to ensure noise levels remain below harmful thresholds and biological monitoring to observe any unexpected changes in fish and shellfish behaviour or health.</p>	<p>The Proposed Development is not proposing any percussive noise sources, such as piling, where monitoring might be expected. The impact assessment presented in the ES benefits from improved Underwater Noise (UWN) modelling (Volume 3, Appendix 4.1: Underwater Noise Technical Assessment of the ES (Document Ref: 6.3.4.1)) and no significant UWN impacts are predicted on fish and shellfish receptors or marine mammals and turtles. The approach and results from the noise assessments have been discussed with statutory regulators, including Natural England, Joint Nature Conservation Committee and the MMO.</p>	N

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Topic	Summary of comments	Response	Design change (Y/N)
Underwater noise	An adaptive management strategy should also be outlined. This should include predefined actions that can be implemented if monitoring indicates that the impact is greater than anticipated. Adaptive measures could involve modifying construction methods or timings to reduce noise during critical periods for sensitive species. This is especially relevant for type 3 species (cod, whiting, Atlantic herring, sprat, allis shad and twaite shad) that are very sensitive to sound.	The Proposed Development is not proposing any percussive noise sources, such as piling, where monitoring might be expected. The impact assessment presented in the ES benefits from improved Underwater Noise (UWN) modelling (Volume 3, Appendix 4.1: Underwater Noise Technical Assessment of the ES (Document Ref: 6.3.4.1)) and no significant UWN impacts are predicted on fish and shellfish receptors or marine mammals and turtles. The approach and results from the noise assessments have been discussed with statutory regulators, including Natural England, Joint Nature Conservation Committee and the MMO.	N
Other issues			
Support	Support for the proposals	This is noted.	N

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Topic	Summary of comments	Response	Design change (Y/N)
<p>Security</p>	<p>Will the offshore portions of the project be safe from sabotage?</p>	<p>The proposed cable protection methods are described in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p> <p>Safety and security standards, similar to those implemented by other cable projects operated by National Grid etc, will be applied. Rigorous and robust security and safety reviews have been undertaken on the project, which are informing the design process.</p> <p>Based on the initial assessment of geotechnical and geophysical survey data provided in the Outline Cable Burial Risk Assessment (CBRA) (Document 6.1.3.4), the cables will be buried along the entire route (Outline CBRA provided as part of the ES). For 220 km of the 371km route in UK waters it is anticipated that the cables will be protected by trenching and covered by natural sediments. It is anticipated that additional protection would be required along approximately 150 km of the route in UK waters.</p> <p>Where the cable cannot be buried at cable crossings or on account of the bed characteristics, cable protection in the form of a rock berm or concrete mattresses would be required.</p> <p>The Proposed Development consists of two Bipoles. These would be buried in two separate trenches with a physical separation between them. This separation would offer additional supply security should for example one Bipole be affected by an unforeseen anchor drag for example.</p>	<p>N</p>

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Topic	Summary of comments	Response	Design change (Y/N)
Security	<p>XLinks have not considered what happened to the gas pipeline. They are at risk of sabotage due to their vulnerability and location in international waters. Bad actors could find the location of the pipeline using magnetic anomaly technology.</p>	<p>The proposed cable protection methods are described in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3). It is noted that the sabotage on the Nord Stream gas pipeline was undertaken in International Waters. The Offshore Cable Corridor sits within UK, French, Spanish, Portuguese and Moroccan waters and none of the cable corridor sits in International Waters. It is also noted that a lot of power is already imported into the UK via subsea cables, for example through interconnector cables within the North Sea.</p> <p>Safety and security standards, similar to those implemented by other cable projects operated by National Grid etc, will be applied. Rigorous and robust security and safety reviews have been undertaken on the project, which are informing the design process.</p> <p>Based on the initial assessment of geotechnical and geophysical survey data provided in the Outline Cable Burial Risk Assessment (CBRA) in the ES (Document 6.1.3.4), the cables will be buried along the entire route in UK waters. For 220 km of the 371km route in UK waters it is anticipated that the cables will be protected by trenching and covered by natural sediments. It is anticipated that additional protection would be required along approximately 150 km of the route in UK waters.</p> <p>Where the cable cannot be buried at cable crossings or on account of the bed characteristics, cable protection in the form of a rock berm or concrete mattresses would be required.</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
<p>Security</p>	<p>Concern regarding national security re the cabling. What procedures are in place in this regard? What plans do you have for the daily monitoring of this cable?</p>	<p>The proposed cable protection methods are described in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p> <p>Safety and security standards, similar to those implemented by other cable projects operated by National Grid etc, will be applied. Rigorous and robust security and safety reviews have been undertaken on the project, which are informing the design process.</p> <p>Based on the initial assessment of geotechnical and geophysical survey data provided in the Outline Cable Burial Risk Assessment (CBRA) (Document 6.1.3.4), the cables will be buried along the entire route in UK waters. For 220 km of the 371km route in UK waters it is anticipated that the cables will be protected by trenching and covered by natural sediments. It is anticipated that additional protection would be required along approximately 150 km of the route in UK waters.</p> <p>Where the cable cannot be buried at cable crossings or on account of the bed characteristics, cable protection in the form of a rock berm or concrete mattresses would be required.</p> <p>We intend to utilise fibre-optic based thermal and acoustic monitoring systems along the whole length of the cable to monitor the cable. This monitoring will be achieved through installing one powered fibre-optic (FO) cable within each HVDC cable bundle. These will carry data between the converter stations in Morocco and the UK. In addition to data transfer, the FO cables will also provide online monitoring of the HVDC cables, including Distributed Temperature Sensing (DTS) and Distributed Acoustic Sensing (DAS).</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
<p>Security</p>	<p>How secure will the cabling be to environmental impacts or human impact, either accidental or deliberate?</p>	<p>The proposed cable protection methods are described in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p> <p>Safety and security standards, similar to those implemented by other cable projects operated by National Grid etc, will be applied. Rigorous and robust security and safety reviews have been undertaken on the project, which are informing the design process.</p> <p>Based on the initial assessment of geotechnical and geophysical survey data provided in the Outline Cable Burial Risk Assessment (CBRA) (Document 6.1.3.4), the cables will be buried along the entire route in UK waters. For 220 km of the 371km route in UK waters it is anticipated that the cables will be protected by trenching and covered by natural sediments. It is anticipated that additional protection would be required along approximately 150 km of the route in UK waters.</p> <p>Where the cable cannot be buried at cable crossings or on account of the bed characteristics, cable protection in the form of a rock berm or concrete mattresses would be required.</p> <p>The Proposed Development consists of two Bipoles. These would be buried in two separate trenches with a physical separation between them. This separation would offer additional supply security should for example one Bipole be affected by an unforeseen anchor drag for example.</p> <p>We intend to utilise fibre-optic based thermal and acoustic monitoring systems along the whole length of the cable to monitor the cable. This monitoring will be achieved through installing one powered fibre-optic (FO) cable within each HVDC cable bundle. These will carry data between the converter stations in Morocco and the UK. In addition to data transfer, the FO cables will also provide online monitoring of the HVDC cables, including Distributed Temperature Sensing (DTS) and Distributed Acoustic Sensing (DAS).</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
Security	<p>The project will supply a significant part of our energy mix, it will need ongoing and sufficient protection from terrorism, and active monitoring to stop natural threats, e.g. seismic or shelf edge collapse. 'Viable fall-back plans, to be enacted in the event of failure, should ideally be in place before construction begins.'</p>	<p>The proposed cable protection methods are described in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p> <p>Safety and security standards, similar to those implemented by other cable projects operated by National Grid etc, will be applied. Rigorous and robust security and safety reviews have been undertaken on the project, which are informing the design process.</p> <p>Based on the initial assessment of geotechnical and geophysical survey data provided in the Outline Cable Burial Risk Assessment (CBRA) in the ES (Document 6.1.3.4), the cables will be buried along the entire route in UK waters. For 220 km of the 371km route in UK waters it is anticipated that the cables will be protected by trenching and covered by natural sediments. It is anticipated that additional protection would be required along approximately 150 km of the route in UK waters.</p> <p>Where the cable cannot be buried at cable crossings or on account of the bed characteristics, cable protection in the form of a rock berm or concrete mattresses would be required. We intend to utilise fibre-optic based thermal and acoustic monitoring systems along the whole length of the cable to monitor the cable. This monitoring will be achieved through installing one powered fibre-optic (FO) cable within each HVDC cable bundle. These will carry data between the converter stations in Morocco and the UK. In addition to data transfer, the FO cables will also provide online monitoring of the HVDC cables, including Distributed Temperature Sensing (DTS) and Distributed Acoustic Sensing (DAS).</p>	N
Marine environment	<p>The project has sought to minimise the length of onshore cable route by increasing the offshore cable route length. While we welcome the efforts to minimise the impacts of the onshore route (see point 2 above), this should not be done at the expense of greater impacts offshore where these impacts are less visible, less 'owned' by communities and therefore hidden. The efforts made to protect the marine environment should be equitable with those to protect the terrestrial/freshwater environment, even though these may not be as obvious.</p>	<p>Potential impacts to the marine environment are assessed in Volume 3, Chapters 1-9 of the ES (Document Ref: 6.3.1-9), with measures proposed to mitigate any impacts. Following mitigation, all residual impacts to marine ecological receptors are assessed as being not significant in EIA terms.</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
Other marine users			
Impact on surfing community	<p>There is a large surfing community at Abbotsham which brings surfers from all over the South west and further. On a good day there can be in excess of 200 people surfing at Abbotsham. There are around 5 different surf breaks at the area which work because of the formation of the rock/reef on the shore. This is why I am concerned about how the cable comes ashore. Does it need to be cut into/ blasted into the reef or does it simply sit on top. If it does need to be cut into the rock then the specific placement of where this comes ashore needs to be taken into consideration as to not damage the surfing reef</p>	<p>We have engaged with local surfers and reassured them that we are employing a trenchless construction technique to install cables at landfall, which would avoid disruption to the seabed, and therefore maintain existing surfing conditions.</p> <p>Changes in seabed from cable protection methodologies has been discussed in Volume 3, Chapter 8: Physical Processes of the ES (Document Ref: 6.3.8). No changes to bathymetry are planned within Bideford Bay. The potential impacts on other marine users, including surfers are assessed in Volume 3 Chapter 6: Other Marine Users of the ES (Document Ref: 6.3.6).</p> <p>There are no construction activities proposed that would affect the ability of surfers to use known coastlines. Potential impacts on the North Devon World Surfing Reserve have been considered, and specifically any potential for impact on geomorphological features, and thus on surf breaks. There are no anticipated above seabed level 'structures' and the probability of using cable rock protection (below seabed level) in Bideford Bay is very low. Trenchless techniques including Horizontal Directional Drilling (HDD) will be used at Landfall to bring the cable onshore. HDD will extend to at least 5 m permanent water depth (Lowest Astronomical Tide) offshore. As outlined in the Consultation Report (Document Ref: 5.1), a meeting between the Applicant and representatives of the surfing community took place on 17 May 2024 to discuss this aspect of the Proposed Development. There are no adverse impacts on surfing predicted as a result of the Proposed Development.</p>	N

Table J.4.2 below sets out responses to the statutory consultation from consultees under s47 of PA 2008 regarding onshore elements of the Proposed Development and the regard had to them by the Applicant. Where multiple responses containing the same comment have been received, these are addressed at the same time in table below. It should be read in conjunction with Section 7.3 of the Consultation Report.

Table J.4.2 - Onshore: Summary of Section 47 responses and regard had by topic

Topic	Summary of comments	Response	Design change (Y/N)
Air quality			
Dust	We know how much dust travels over Robin Hill Farm Cottages during the summer - particularly at harvest time, depending on wind direction, our whole site can be covered in dust. Particularly in peak summer, guests will often leave the cottages' windows open for ventilation and we have seen how much dust can enter a cottage during just a couple of days of harvesting. All of the cottages, guest conservatory and farmhouse windows require cleaning after harvest time or when tractors have been active in the fields during dry weather.	<p>An assessment of dust generated during the construction and decommissioning phases is considered in Section 7.10 and Section 7.12 respectively, within Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7). Mitigation measures are outlined in Table 7.21, which would be implemented during construction and decommissioning to ensure that impacts from dust are reduced to levels that are not significant in EIA terms.</p> <p>As such, Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7) concludes that there would be no significant air quality or dust effects arising from the Proposed Development.</p> <p>A Dust Management Plan (DMP) will be prepared prior to construction, in accordance with the Outline DMP (Document Ref: 7.9) that forms part of the application for development consent. The Outline DMP comprises suitable measures based upon Institute of Air Quality Management (IAQM) dust guidance (IAQM, 2024).</p>	N
Alternatives and need			
Support	Support for the decision following the first round of non-statutory consultation to move the proposed location of the converter station site to Old Webbery Showground.	This is noted.	N
Climate change	There is an offshore wind farm proposed nearby that will impact the area, so what is the need to bring a cable from Morocco. This is not a carbon neutral or clean project.	As outlined in the Planning Statement (Document Ref: 7.2), Part 3 of National Policy Statement EN-1 establishes an indisputable and urgent policy need for all types of energy infrastructure in order to achieve energy security and dramatically reduce carbon emissions (NPS EN-1, paragraph 3.1.1). Part 3 also explains that, without significant amounts of new large-	N

Topic	Summary of comments	Response	Design change (Y/N)
		<p>scale energy infrastructure, the Government's energy and climate change objectives cannot be fulfilled.</p> <p>National Policy Statement for Electricity Networks Infrastructure (EN-5) states that the security and reliability of the UK's energy supply, both currently and in the future, is heavily dependent on an electricity network that will allow for generation, storage, and interconnection infrastructure to meet the required rapid increase in electricity demand for the transition to net zero.</p> <p>Volume 4, Chapter 1: Climate Change of the ES (Document Ref: 6.4.1) sets out the assessment of effects in relation to climate change. Climate change in this context refers to the long-term shifts in temperatures and weather patterns that are fundamentally driven by human activities.</p> <p>Assessment as part of the Environmental Statement concludes that avoided GHG emissions resulting from the displacement of higher emitting electricity generation sources, is enabled by the Proposed Development. This would result in a significant beneficial effect to climate change in EIA terms.</p>	
Energy security	<p>The XLinks proposal is financially detrimental for the UK. The XLinks project will provide a financial mechanism to remove at least £2.5bn from the UK economy on an annual basis for a period of up to 25 years. In total at least £60bn would be syphoned out of the UK economy over 25 years. Alternative investment in UK renewable generation would keep this money in the UK.</p>	<p>Project funding, and a demonstration that funding will not be an impediment to delivery, is demonstrated in the Funding Statement submitted as part of the DCO application (Document Ref: 4.2). Funding for the Proposed Development represents investment into the UK.</p> <p>A lot of power is already imported into the UK, including 20% of electricity demand in Q2 2024. It is also common for large renewable projects, such as offshore wind, to have similar project-financed funding arrangements with international investors. Furthermore, the applicant does not recognise the figures used since XLinks 1 Limited is a UK entity and will own either directly or indirectly both the HVDC cable system and the renewable generation facility associated with the Project. This project helps to bring clean reliable power, on a dedicated supply from Morocco, a long-standing UK partner. And while we believe that we should maximise the UK's domestic renewables opportunity, we will need a more diverse mix of</p>	N

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Topic	Summary of comments	Response	Design change (Y/N)
		<p>reliable, affordable and green power is key to keeping the UK running in the coming years as our energy system, transport and homes become increasingly electrified, and demand for electricity continues to grow.</p> <p>As set out in the Planning Statement (Document Ref: 7.2) submitted as part of the DCO application, National Policy Statement for Electricity Networks Infrastructure (EN-5) states that the security and reliability of the UK's energy supply, both currently and in the future, is heavily dependent on an electricity network that will allow for generation, storage, and interconnection infrastructure to meet the required rapid increase in electricity demand for the transition to net zero.</p> <p>The power generated as part of the Project would complement the energy we already generate from the sun and wind in the United Kingdom. When domestic renewable energy generation in the UK drops due to low winds and short periods of sun, the Project can provide access to the benefits of long hours of sun and consistent winds in Morocco to provide a firm but flexible source of zero-carbon electricity. The inclusion of a 22.5GWh/5GW battery facility in Morocco means this energy would be reliably available when it's most needed in Great Britain. The Morocco-UK Power Project will be an important contributor to a well-balanced grid.</p>	
Energy security	Any additional reliance on imported electricity would mean additional exposure for the UK to upward fluctuations in world prices.	<p>A lot of power is already imported into the UK, including 20% of electricity demand in Q2 2024. This project helps to bring clean reliable power, on a dedicated supply from Morocco, a long-standing UK partner. And while we believe that we should maximise the UK's domestic renewables opportunity, we will need a more diverse mix of reliable, affordable and green power is key to keeping the UK running in the coming years as our energy system, transport and homes become increasingly electrified, and demand for electricity continues to grow.</p> <p>The power generated as part of the Project would complement the energy we already generate from the sun and wind in the United Kingdom. When domestic renewable energy generation in the UK drops due to low winds and short periods of sun, the Project can provide access to the benefits of</p>	N

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Topic	Summary of comments	Response	Design change (Y/N)
		<p>long hours of sun and consistent winds in Morocco to provide a firm but flexible source of zero-carbon electricity. The inclusion of a 22.5GWh/5GW battery facility in Morocco means this energy would be reliably available when it's most needed in Great Britain. The Morocco-UK Power Project will be an important contributor to a well-balanced grid.</p> <p>The Applicant anticipates that downward pressure on electricity prices will be exerted by the integration of the Proposed Development, and the wider Project, into the UK electricity supply. The Project has the capacity to power 7 million homes, meeting 8% of the UK's energy needs, helping reduce reliance on oil and gas imports and the price spikes we experience from those.</p>	
Energy security	<p>I am still undecided at this stage that sourcing solar energy from abroad is the most sensible option for the UK having seen how foreign energy dependency can lead to problems in recent years. However, it is certainly one option for us nationally.</p>	<p>This project helps to bring clean reliable power, on a dedicated supply, with a long-standing UK partner. And while we believe that we should maximise the UK's domestic renewables opportunity, we will need a more diverse mix of reliable, affordable and green power is key to keeping the UK running in the coming years as our energy system, transport and homes become increasingly electrified, and demand for electricity continues to grow.</p> <p>The power generated as part of the Project would complement the energy we already generate from the sun and wind in the United Kingdom. When domestic renewable energy generation in the UK drops due to low winds and short periods of sun, the Project can provide access to the benefits of long hours of sun and consistent winds in Morocco to provide a firm but flexible source of zero-carbon electricity. The inclusion of a 22.5GWh/5GW battery facility in Morocco means this energy would be reliably available when it's most needed in Great Britain. The Morocco-UK Power Project will be an important contributor to a well-balanced grid.</p> <p>We anticipate that downward pressure on electricity prices will be exerted by the integration of the Proposed Development, and the wider Project, into the UK electricity supply. The Project has the capacity to power 7 million homes, meeting 8% of the UK's energy needs, helping reduce</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
		reliance on oil and gas imports and the price spikes we experience from those.	
Support	Support for the new location of the converter site and cable route.	This is noted.	N
Site selection	<p>XLinks claim the converter station site was made in reference to the community – this is wrong. Only the PC was involved, they have homes closest to the original site, and campaigned to change the location of the site. The new location is worse and impacts more homes. The consultation have not had plans showing where the converter stations will be on the site.</p> <p>The converter stations should be built closer to where the cables make land – this would reduce the area of land being impacted by the cable route – significant impact on wildlife and nearby residents.</p>	<p>The location and siting of the onshore elements of the Proposed Development have been informed by a site selection and route refinement process, which is set out within the Project Development and Considerations of Options document appended to the Planning Statement (Document Ref: 7.2) and in Volume 1, Chapter 4: Need and Alternatives of the ES (Document Ref: 6.1.4). This process has considered a wide range of environmental constraints as well as technical and commercial factors.</p> <p>The Applicant undertook non-statutory consultation in November 2022 on a proposed alternative converter site in Huntshaw.</p> <p>As outlined in the Consultation Report (Document Ref: 5.1), the original proposed location of the Converter Station was one of the primary themes of feedback to this phase of non-statutory consultation, particularly in regard to heritage, access and landscape concerns.</p> <p>The Applicant notes that although the Old Webbery Showground site sits closer to the ridge line, the site allows for appropriate earthworks to 'sink' the Converter Hall into the ridge line and has adequate space for appropriate landscape bunding to mitigate potential landscape and visual impacts associated with the buildings and infrastructure.</p> <p>There are additional benefits to locating the converter stations closer to the connection point. The cable corridor for HVDC cabling is significantly narrower than that for the equivalent HVAC cables. A longer HVAC cable corridor would therefore require a more significant land take and associated environmental impact than is proposed between the Converter Station Site and the existing Alverdiscott Substation Site.</p>	N
Site selection	The location of the converter station is poorly thought out. Poor in terms of access during construction, operation and maintenance. It is in the middle of the countryside and only accessible through narrow country	The location and siting of the onshore elements of the Proposed Development have been informed by a site selection and route refinement process, which is set out within the Project Development and	N

Topic	Summary of comments	Response	Design change (Y/N)
	lanes, and is surrounded by farmland. The temporary haul road will be added disturbance.	<p>Considerations of Options document appended to the Planning Statement (Document Ref: 7.2) and in Volume 1, Chapter 4: Need and Alternatives of the ES (Document Ref: 6.1.4). This process has considered a wide range of environmental constraints as well as technical and commercial factors.</p> <p>Aspects relating to the converter station are considered in Section 3.7 of the ES chapter.</p> <p>As outlined in the Consultation Report (Document Ref: 5.1), the original proposed location of the Converter Station was one of the primary themes of feedback to the non-statutory consultation, particularly in regard to heritage, access and landscape concerns. As outlined in Section 2.3 of the Consultation Report, the non-statutory consultation sought feedback on the location of the converter station site and options for onshore cable routes. Key changes made to the design as a result of wider community feedback at this stage included moving the converter station site to its current proposed location at the Old Webbery Showground and moving the onshore cable corridor further from Abbotsham.</p> <p>As part of the DCO application, we have produced several outline documents and strategies, including an Outline Onshore Construction Environment Management Plan (On-CEMP) (Document Ref: 7.7) and an Outline Construction Traffic Management Plan (CTMP) (Document Ref: 7.12). These documents set out the intention to provide access tracks ('haul roads') and improvements to the local highway network. The haul roads have been proposed to remove construction traffic, particularly HGVs from narrow country lanes by providing a dedicated offline route for construction traffic.</p>	
Climate			
Supply chain	I would like external scrutiny of proposals of energy costs in terms of the project itself. This included energy involved in building of ships, manufacture of solar panels, cables, lithium batteries and all infrastructure and equipment involved.	Energy costs are considered in terms of carbon impact. The methodology used to assess the impact of the greenhouse gas emissions associated with the Proposed Development is detailed in Section 1.6 within Volume 4, Chapter 1: Climate Change of the ES (Document Ref: 6.4.1).	N

Topic	Summary of comments	Response	Design change (Y/N)
		<p>The mitigation measures proposed as part of the Proposed Development are detailed within Section 1.9.</p>	
Carbon offset	<p>What is the carbon cost of the project and how long will it take to offset</p>	<p>The methodology used to assess the impact of the greenhouse gas emissions associated with the Proposed Development is detailed in Section 1.6 within Volume 4, Chapter 1: Climate Change of the ES (Document Ref: 6.4.1).</p> <p>The Project would have a carbon payback period of 2 years (at the earliest) or 3 years in the current UK grid average scenario assessed when accounting for construction, operation and maintenance and decommissioning phase emissions (see Table 1.19 in Volume 4, Chapter 1: Climate Change of the ES (Document Ref: 6.4.1)).</p> <p>The mitigation measures proposed as part of the Proposed Development are detailed within Section 1.9.</p>	<p>N</p>
Community Benefit			
Employment	<p>Employment opportunities would be valued.</p>	<p>Employment effects of the Proposed Development are considered in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p> <p>Employment impacts as a result of the onshore construction phase are summarised in Table 3.38. 340 employment years are predicted in the Local Area during this phase (240 in direct employment, 50 in indirect employment, and 50 in induced employment).</p> <p>The Applicant has also developed an Outline Skills and Employment Strategy (Document Ref: 7.23) which is included with the DCO application. Skills and Employment Strategies will be developed by the Construction Contractors in accordance with the outline strategy, detailing how local skills and employment opportunities will be developed through the Proposed Development.</p> <p>The Applicant is exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, which may include the tender of work</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
		<p>packages during the construction of the project and through the establishment of a community benefit fund.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p> <p>The Applicant is developing a Community Benefit Package and seeking where possible to align with the socio-economic aims outlined in 'North Devon and Torridge Economic Strategy 2024-29', 'Torridge District Council's Strategic Plan 2024-29' and 'Place Story', as well as Devon County Council's Strategic Plan 2021-25.</p> <p>We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway. The community benefit package will respond to local need, and we will share more information on its development during examination.</p>	
Access roads	Improve access roads.	<p>The Applicant has proposed a permanent upgrade of the junction at the A386 and the unnamed road leading to Littleham. The junction will be signalled for the duration of construction works and will help facilitate construction traffic enter the temporary construction compound, but will also provide a permanent improvement to the junction once construction works are completed.</p> <p>Other proposed highways works are proposed to improve temporary access to work areas, such as the access via the Cornborough Sewage Treatment Works or operational access for future Abnormal Indivisible Load (AIL) access to the Converter Site, by removing pinch points on Gammaton Road.</p>	N

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Topic	Summary of comments	Response	Design change (Y/N)
		<p>The traffic assessment provided in Volume 2: Chapter 5: Traffic and Transport (Document Ref: 6.2.5) does not identify the requirement for any other junction improvements as part of the Proposed Development. However, the Applicant is in discussion with Devon County Council (DCC) about making appropriate contributions to support Council's proposed improvement works at the Manteo Way and Barnstaple Road junction. This would be secured through a Section106 agreement directly with DCC.</p>	
Footpaths	New footpaths.	<p>It is important to note that any land within the order limits of a Development Consent Order for the routing of the onshore cable elements of the Proposed Development will be returned to the relevant landowners. Any future cycling or walking routes would need to be developed by landowners following approval of relevant planning applications for a change to public use.</p> <p>The Applicant notes that the provision of a footpath from Manteo Way to the temporary construction compound on Gammaton Road is under consideration as part of the proposed highway works. The Applicant will develop the design for these works in consultation with Devon District Council as the relevant highway authority, taking into consideration any requests by residents on Gammaton Road.</p>	N
Local energy benefits	Help the local community access renewable energy.	<p>The Applicant has committed to the implementation of a Community Benefit Fund, and this was communicated to Torridge District Council and Devon County Council in a meeting on 4 October 2024. Some benefits will be provided directly through the DCO and the delivery of the Project and some will be outside of the DCO pursuant of the Community Benefits Package.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p>	N

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Topic	Summary of comments	Response	Design change (Y/N)
		<p>The Applicant is developing a Community Benefit Package and seeking where possible to align with the socio-economic aims outlined in 'North Devon and Torridge Economic Strategy 2024-29', 'Torridge District Council's Strategic Plan 2024-29' and 'Place Story', as well as Devon County Council's Strategic Plan 2021-25. We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway. The community benefit package will respond to local need, and we will share more information on its development during examination.</p>	
Support	<p>The project itself is good for the community – a reliable supply of electricity at a good price.</p>	<p>This is noted.</p>	<p>N</p>
Community benefits	<p>You should communicate to the community that the benefits of XLinks are 'more widespread'.</p>	<p>The Applicant is exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p> <p>The Applicant will continue working to develop a community benefit package that responds to local need and will share more information during examination.</p> <p>We will engage with the community as our plans mature to make sure that community voice has a role in refining our package, and that the benefits of the project are communicated properly to residents and local stakeholders.</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
		<p>We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway.</p>	
<p>Community benefits</p>	<p>A local charity, Wings. It is located only a few hundred metres from the cable route in Abbotsham.</p>	<p>The Applicant has committed to the implementation of a Community Benefit Fund, and this was communicated to Torrridge District Council and Devon County Council in a meeting on 4 October 2024. The fund will be managed by an independent grant making body. The Applicant will re-engage with relevant community groups, including charities such as Wings, regarding community funding once a fund is established. The precise allocation of funds and benefits will be for further assessment following community engagement and the Applicant cannot form a view at this stage on the items suggested for possible funding.</p> <p>We are exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, including through the establishment of a community benefit fund.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p> <p>The Applicant is developing a Community Benefit Package and seeking where possible to align with the socio-economic aims outlined in 'North Devon and Torrridge Economic Strategy 2024-29', 'Torrridge District Council's Strategic Plan 2024-29' and 'Place Story', as well as Devon County Council's Strategic Plan 2021-25. We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already</p>	<p>N</p>

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Topic	Summary of comments	Response	Design change (Y/N)
		underway. The community benefit package will respond to local need, and we will share more information on its development during examination.	
Community benefits	Bideford East is the poorest ward in the district and one the poorest in the country – community benefit should be focused here. These include free energy for social housing, insulation upgrades for older residents, installing low energy street lighting, new allotments, trees, community group/activity funding, upgrading the leisure pool, heat pumps, and new insulation. It is not clear what or much XLinks will fund.	<p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our statutory public consultation. We're grateful to everyone who shared their views.</p> <p>The Applicant is developing a Community Benefit Package and seeking where possible to align with the socio-economic aims outlined in 'North Devon and Torridge Economic Strategy 2024-29', 'Torridge District Council's Strategic Plan 2024-29' and 'Place Story', as well as Devon County Council's Strategic Plan 2021-25. We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway. The community benefit package will respond to local need, and we will share more information on its development during examination.</p>	N
Community benefits	XLinks could provide greater access to the countryside for residents – North Devon does not have a good network of footpaths. You could give funding to develop or enhance existing footpaths too around Landcross and Abbotsham Cliffs 'in order to create a good quality cycling and/or walking route that connects the Tarka Trail with the coast path'.	The Applicant is required to return land used for the construction of the Onshore HVDC cable corridor to current landowners to continue their agricultural operations. Any future cycling or walking routes would need to be developed by landowners following approval of relevant planning applications for a change to public use.	N
Community benefits	XLinks could create a new cycle/walking route to link the south and west of Bideford with the coastal path. The cable route could be converted into a cycle path.	<p>The Applicant is required to return land used for the construction of the Onshore HVDC cable corridor to current landowners to continue their agricultural operations.</p> <p>Any future cycling or walking routes would need to be developed by landowners following approval of relevant planning applications for a change to public use.</p>	N

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Topic	Summary of comments	Response	Design change (Y/N)
Community benefits	Bideford, Littleham and Westward Ho! Cricket Club – were in discussions about moving their pitch to the site at Abbotsham Cross roundabout now being used as a construction compound – request to meet to discuss this. The club is also looking for funding opportunities.	<p>The Applicant is required to return land to current landowners to continue their agricultural operations. We would have no legal rights beyond the temporary use of the land for a construction compound.</p> <p>Given this, the Applicant has not prepared any plans for community use of the compound following the construction phase and note that any proposed land use change would require consent of the landowner and a separate planning application. The Applicant will re-engage with relevant community groups regarding community funding once a fund is established.</p>	N
Community benefits	There are no benefits to the community.	<p>The Applicant is exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, including through the establishment of a community benefit fund.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p> <p>The Applicant is continuing work to develop a community benefit package that responds to local need and will share more information during examination. We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway.</p>	N
Community benefits	Further detail is required on community benefit	<p>The Applicant is exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, including through the establishment of a community benefit fund.</p>	N

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Topic	Summary of comments	Response	Design change (Y/N)
		<p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p> <p>The Applicant is continuing work to develop a community benefit package that responds to local need and will share more information during examination. We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway.</p>	
Support	XLinks will become part of the local electricity infrastructure and provide an additional source of energy.	This is noted.	N
Community benefits	Any temporary disruption will be outweighed by benefits further down the line. We will be less reliant on fossil fuels and other countries 'turning off our electricity' – energy security.	<p>This is noted.</p> <p>This Proposed Development can bring clean reliable power, on a dedicated supply, with the involvement of Morocco, a long-standing UK partner. And while we believe that we should maximise the UK's domestic renewables opportunity, a more diverse mix of reliable, affordable and green power is key to keeping the UK running in the coming years as our energy system, transport and homes become increasingly electrified, and demand for electricity continues to grow.</p> <p>The power generated as part of the Project would complement the energy we already generate from the sun and wind in the United Kingdom. When domestic renewable energy generation in the UK drops due to low winds and short periods of sun, the Project can provide access to the benefits of long hours of sun and consistent winds in Morocco to provide a firm but flexible source of zero-carbon electricity. The inclusion of a 22.5GWh/5GW battery facility in Morocco means this energy would be reliably available when it's most needed in Great Britain. The Morocco-UK Power Project will be an important contributor to a well-balanced grid.</p>	N

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Topic	Summary of comments	Response	Design change (Y/N)
<p>Community benefits</p>	<p>I believe that the wider community should benefit through financial payments for communities to spend on further investment in energy and biodiversity projects. These should be generous and would ensure community engagement and though you state on your website that you will establish a community benefit fund, it is not clear at this stage what this means.</p>	<p>The Applicant is exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, including through the establishment of a community benefit fund.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p> <p>The Applicant is working with Torridge District Council and Devon County Council to develop a community benefit package that responds to local need and will share more information during examination. We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway.</p>	<p>N</p>
<p>Community benefits</p>	<p>I cannot see any benefits yet.</p>	<p>The Applicant is exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon. The fund will be managed by an independent grant making body. The Applicant will re-engage with relevant community groups and initiatives regarding community funding once a fund is established. The precise allocation of funds and benefits will be for further assessment following community engagement and the Applicant cannot form a view at this stage on the items suggested for possible funding.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
		<p>The Applicant is continuing work to develop a community benefit package that responds to local need and will share more information during examination. We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway.</p>	
Need case	<p>Encourage all new builds, houses, offices, garages, and barns to install solar panels on their roofs.</p>	<p>This is not within the scope of the Proposed Development</p> <p>As outlined in the Planning Statement (Document Ref: 7.2), Part 3 of National Policy Statement EN-1 establishes an indisputable and urgent policy need for all types of energy infrastructure in order to achieve energy security and dramatically reduce carbon emissions (NPS EN-1, paragraph 3.1.1). Part 3 also explains that, without significant amounts of new large-scale energy infrastructure, the Government's energy and climate change objectives cannot be fulfilled.</p> <p>As such, large-scale infrastructure should be seen as a complement, rather than an alternative to smaller-scale generation such as rooftop PV and maturing tidal technology. It is a reality that, even if rooftop PV generation capacity was greatly expanded across the country, it would not provide enough power either to meet current or projected future demand without a similar deployment of large-scale infrastructure.</p>	N
EV charging	<p>Not enough EV charging in the area. You could help with this immediately. 'Car numbers are increasing rapidly, 6000 new homes are being built locally with little or no road improvements to accommodate the increased vehicle numbers. North Devon's geography makes this a big problem.'</p>	<p>The Applicant is exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, including through the establishment of a community benefit fund.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
		<p>The Applicant is continuing work to develop a community benefit package that responds to local need and will share more information during examination.</p> <p>We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway.</p>	
Health impacts	<p>No amount of community funds could compensate for the impact on health and wellbeing and impact on property value. You could reimburse residents for the loss of property value and inability to sell – multiple properties are for sale and not selling.</p>	<p>The Applicant has been in contact with a number of landowners who have raised concerns about impacts on the ability to sell their properties. This is an ongoing process, and the Applicant is reviewing these on a case-by-case basis. We will continue to engage with landowners to understand and look to resolve any concerns they have prior to and during the construction of the project to minimise potential impacts on their ability to sell properties.</p> <p>The Applicant furthermore recognises the importance of assessing and avoiding, reducing or mitigating potential impacts on people living close to the Proposed Development. The impact of the Proposed Development on human health, including mental health, is considered in Volume 4, Chapter 4: Human Health of the ES (Document Ref: 6.4.4).</p> <p>Overall, it is concluded that there will be no significant adverse population health effects arising from the Proposed Development during the construction, operation and maintenance or decommissioning phases. A significant beneficial public health effect in relation to energy security is noted in Section 4.16 of the ES chapter.</p>	N
Employment	<p>The only opportunity this will bring is the potential to employ locals in the construction phase.</p>	<p>The Applicant is exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon. The fund will be managed by an independent grant making body. The Applicant will re-engage with relevant community groups and initiatives regarding community funding once a fund is established. The precise allocation of funds and benefits will be for</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
		<p>further assessment following community engagement and the Applicant cannot form a view at this stage on the items suggested for possible funding.</p> <p>We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.</p> <p>The Applicant is continuing work to develop a community benefit package that responds to local need and will share more information during examination. We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway.</p>	
<p>Community benefit</p>	<p>Consider supporting local initiatives linked to the Heritage Harbour (https://maritimeheritage.org.uk/uk-heritage-harbours/bideford-river-torridge) – talk to Way of the Wharves.</p>	<p>The Applicant is exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon. The fund will be managed by an independent grant making body. The Applicant will re-engage with relevant community groups and initiatives regarding community funding once a fund is established. The precise allocation of funds and benefits will be for further assessment following community engagement and the Applicant cannot form a view at this stage on the items suggested for possible funding.</p> <p>The Applicant is developing a Community Benefit Package and seeking where possible to align with the socio-economic aims outlined in 'North Devon and Torridge Economic Strategy 2024-29', 'Torridge District Council's Strategic Plan 2024-29' and 'Place Story', as well as Devon County Council's Strategic Plan 2021-25. We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a</p>	<p>N</p>

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Topic	Summary of comments	Response	Design change (Y/N)
		<p>lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway. The community benefit package will respond to local need, and we will share more information on its development during examination.</p>	
Community benefit	<p>'This project has no benefit to the local area as the power is being sent up country.'</p>	<p>Volume 4, Chapter 1: Climate Change of the ES (Document Ref: 6.4.1) identifies a major beneficial effect on GHG emissions. This would benefit all parts of the UK.</p> <p>The Applicant is also exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the Proposed Development in Devon, including through the establishment of a community benefit fund.</p> <p>The Applicant is continuing work to develop a community benefit package that responds to local need and will share more information during examination.</p>	N
Construction			
Communication	<p>Communicate during construction of the converter station if things go wrong.</p>	<p>Thorough communication with local residents and stakeholders will continue throughout construction. As outlined in the Outline Onshore Construction Environmental Management Plan (On-CEMP) (Document Ref: 7.7), a Community Liaison Group would be set up prior to construction and would continue through the construction phase of the Proposed Development as a formal forum for local issues to be raised. A Community Liaison Officer would be appointed to lead discussions with local communities, and also act as the primary point of contact should there be any queries or complaints.</p> <p>In addition, a Community Liaison Officer will be appointed to act as a dedicated point of contact for local stakeholders and would take a proactive approach to communications.</p>	N
Communication	<p>'I in Woodtown and the construction [of onshore cables] will be on the ridge-olho side of valley - therefore - dust, noise and visibility is of concern - would be helpful if communication is good.'</p>	<p>As part of the DCO application, the Applicant has produced several outline documents and strategies, including an Outline Onshore Construction Environment Management Plan (CEMP) (Document Ref: 7.7) The Outline</p>	N

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Topic	Summary of comments	Response	Design change (Y/N)
		<p>Onshore CEMP includes measures to avoid, reduce or mitigate disruption from dust, noise and visual impacts during construction. In addition, thorough communication with local residents and stakeholders will continue throughout construction.</p> <p>As outlined in the Outline Onshore CEMP (Document Ref: 7.7), a Community Liaison Group would be set up prior to construction and would continue through the construction phase of the Proposed Development as a formal forum for local issues to be raised. A Community Liaison Officer would be appointed to lead discussions with local communities, and also act as the primary point of contact should there be any queries or complaints.</p> <p>A Community Liaison Officer will be appointed to act as a dedicated point of contact for local stakeholders and would take a proactive approach to communications.</p>	
PRoW	Will you limit access to the South West Coastal Path at any time?	<p>Impacts upon PRoW and the Tarka Trail are considered within the Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8).</p> <p>The construction of the landfall would be undertaken by HDD or other trenchless technique to cross under the Coastal Path. On this basis, the use of the Coastal Path would remain directly unaffected during the construction period.</p> <p>There would be a negligible impact in the physical accessibility of these routes. The implementation of the Outline Public Rights of Way Management Plan (Document Ref: 7.11) would ensure that disruption of PRoW during the construction period would be reduced, as far as reasonably practicable.</p>	N
Programme	How long will the onshore construction last?	<p>Preliminary construction works are anticipated to start in late 2026.</p> <p>Construction of the overall project would last for around 72 months, but we will work in phases so we will not be working in every part of the site for the whole of this period.</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
Construction impacts	Bideford East ward will be the worst affected area as the converter station will take 5-6 years to build as opposed to the cable which will only take 2.	<p>This is noted. As part of the Environmental Impact Assessment undertaken for the DCO application, we have assessed the potential impact of the construction phase of the Proposed Development on local residents.</p> <p>An Outline Onshore Construction Environmental Management Plan (On-CEMP) (Document Ref: 7.7) has been prepared as part of the DCO application. Final Onshore-CEMP(s) would be developed by the Construction Contractors in accordance with the Outline Onshore-CEMP.</p> <p>The Onshore-CEMP(s) would incorporate measures to ensure that any potential environmental impacts would be minimised during construction.</p>	N
Noise & vibration	Concern that traffic movements at night would cause vibration as well as noise .	<p>Normal construction working hours will be Monday to Friday, 07:00-19:00, and Saturday, 07:00-13:00; however, some operations may require work to take place outside these times.</p> <p>These could include Abnormal Indivisible Loads (AILs), which would be transported at night or in the early hours of the morning. The Applicant would agree activities like this in advance with local authorities.</p> <p>An assessment of noise and vibration generated during the construction phase of the Proposed Development has been carried out in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6). Further details can be found in Volume 2, Appendix 6.2: Construction Noise and Vibration, of the ES (Document Ref: 6.2.6.2)</p> <p>This assessment has found that noise and vibration associated with construction traffic are not expected to generate significant adverse effects. Typically, doubling the number of vehicles on a road increases the noise levels generated by road traffic by 3dB, which would generate an impact of only a low magnitude. However, it is not expected that construction traffic would generate a doubling of road traffic on the local road network.</p>	N
Long-term benefits	'The long-term benefit of the project will outweigh any inconvenience caused by any construction.'	This is noted.	N

Topic	Summary of comments	Response	Design change (Y/N)
Accommodation	How can the locals provide accommodation for 400 people working on the site. Will a local workforce be trained and employed?	<p>An Outline Skills and Employment Strategy has been provided with the DCO application (Document Ref: 7.23). Skills and Employment Plans will be developed in accordance with the Outline Skills and Employment Strategy prior to and during the construction phase, setting how the Applicant and its Contractors will engage with the local community to provide opportunities for skills development and employment, particularly during the construction phase of the Proposed Development.</p> <p>The impact of the Proposed Development on the local economy and labour market is considered in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p> <p>The Applicant has prepared an Outline Accommodation Strategy (Document Ref: 7.13). The strategy identifies alternative accommodation options available within the Torridge and North Devon areas and recommends appropriate accommodation sources for promotion prior to the commencement of construction, such as use of spare rooms and sharing private rental accommodation. These measures have been used on other large scale construction projects such as Hinkley Point C.</p> <p>The use of spare rooms and private rental accommodation significantly reduces reliance on other accommodation sources which rely on tourism.</p>	N
Disruption	Concerned about disruption to locals during construction – disruption must be minimised. Operating times for instance must be changed to usual construction times of 8am to 6pm Mon to Fri and 8am to 1pm Sat – locals can then avoid those times.	<p>An Outline Onshore Construction Environment Management Programme (CEMP) has been submitted with the DCO application (Document Ref: 7.7) which outlines mitigation measures to minimise potential construction impacts.</p> <p>Core working hours would be Monday to Friday 07:00-19:00 and Saturday 07:00-13:00. No construction works would be permitted on Sundays or Bank Holidays, unless otherwise agreed with Torridge District Council. These are standard working hours which are adopted across the construction industry on projects of a similar scale.</p> <p>Up to an hour before and after the normal construction working hours, there would be mobilisation and demobilisation activities.</p>	N

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		<p>If night-time operation is required, the closest residents to the works shall be notified of the start and completion of the works, as set out in the outline onshore CEMP. The HDD plant would be installed and operated such that noise levels do not exceed a level of 45dB LAeq at the closest neighbouring noise-sensitive locations during night-time operation. Depending on the plant used, location, pit depth, etc., this may require the use of acoustic screening using temporary solid barriers with a height of at least that of the drilling equipment located in proximity (around 10m or less) of the trenchless drilling work.</p> <p>Construction works including proposed working hours, will be managed through an Onshore CEMP, developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7).</p>	
Disruption	Construction of the converter site will be a nightmare for residents.	<p>We empathise with the impacts felt by the nearest neighbours to the construction compound and converter station.</p> <p>The Applicant will work closely with residents to design and implement mitigation measures within the construction compound to minimise impacts on this property. This includes working with the residents to review:</p> <ul style="list-style-type: none"> • the location and height of proposed hoarding or temporary bunds to minimise visual and noise impacts • the siting of the temporary compound access to minimise road safety concerns with access to the compound • temporary and permanent highway works on Gammaton Road to address road safety concerns • siting of compound facilities such as the offices and welfare and the car park to minimise noise impacts associated with the daily operation of the compound. <p>Thorough communication with local residents and stakeholders will continue throughout construction. As outlined in the Outline Onshore CEMP (Document Ref: 7.7), and a Community Liaison Group would be set up prior to construction and would continue through the construction phase of the Proposed Development as a formal forum for local issues to be</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
		<p>raised. A Community Liaison Officer would be appointed to lead discussions with local communities, and also act as the primary point of contact should there be any queries or complaints.</p> <p>In addition, a Community Liaison Officer will be appointed to act as a dedicated point of contact for local stakeholders and would take a proactive approach to communications.</p>	
Cumulative impacts	<p>The area is not suitable for such a large development – cumulative impact of another industrial solar development.</p>	<p>The cumulative impact of the Proposed Development and other developments coming forward in the North Devon region is considered in the Environmental Statement.</p> <p>The assessment of cumulative effects has been guided by a database (long list) of planning applications and relevant policies, and which was the subject of Statutory Consultation.</p> <p>The long list is contained in Volume 1, Appendix 5.3: Cumulative Effects Assessment Screening Matrix of the ES (Document Ref: 6.1.5.3). A number of proposed solar farm developments are screened into the EIA for the assessment of cumulative effects.</p> <p>Cumulative effects for each EIA topic are also assessed in the relevant ES chapters. We are working to minimise as far as possible the effects on local communities, and the Environmental Statement outlines a series of mitigations to reduce this impact during construction, operation and decommissioning.</p>	N
Construction traffic	<p>Page 18 of the Statutory Public Consultation Booklet (SPCB) mentions preparing a Construction Traffic Management Plan (CTMP): it would be imperative due to recent events at Gammaton Cross, involving 40 FT. HGV'S using unauthorized routes to access the construction sites of the Gammaton Moor solar parks, to ensure that the CTMP is sensible, well thought out and implemented to the letter. The solar park traffic has led to damage to our roads and hedges also resulting in a catastrophic incident involving extensive damage to a Gammaton Cross property</p>	<p>This is noted. We understand local concern regarding the cumulative effect of developments in the North Devon region. We are working to minimise as far as possible the effects on local communities, and the Environmental Statement outlines a series of mitigations to reduce this impact during construction, operation and decommissioning.</p> <p>An outline Construction Traffic Management Plan (CTMP) (Document Ref: 7.12) is submitted as part of the DCO application. We are aware of community concern in relation to the recent accident at Gammaton Cross.</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
	<p>and a near fatality of an occupant. This incident is under investigation by Torridge District Council at the time of writing.</p>	<p>We have a dedicated haul road for construction traffic which bypasses this intersection, removing HGV traffic from the local road network.</p>	
<p>Construction impacts</p>	<p>Our property overlooks the proposed field for the Gammaton Road construction compound and is extremely close to the proposed haul road between the construction compound and converter site. This raises major concerns for our family wellbeing regarding noise, dust and visual impacts during the proposed construction phase 2027-2032.</p> <p>Finally, from a family perspective, it's absolutely fair to say that we really don't want the construction compound in our 'back yard' and wish that there were alternative options for its location. It feels inevitable that should the plans proceed as currently imagined that we will sacrifice to a greater or lesser degree a considerable amount of our peace and wellbeing for many years. There could well be a moral or philosophical argument that sometimes the proverbial omelette cannot be made without breaking at least a few eggs... in this case for the greater good of society. But it doesn't feel that great to be a potential egg!</p>	<p>We empathise with the impacts felt by the nearest neighbours to the construction compound and converter station. Thorough communication with local residents and stakeholders will continue throughout construction.</p> <p>The Applicant understands the concerns raised by the resident in relation to the location of the Gammaton Road compound which sits directly opposite their property.</p> <p>The Applicant will work closely with the residents to design and implement mitigation measures within the construction compound to minimise impacts on this property.</p> <p>This includes working with the residents to review:</p> <ul style="list-style-type: none"> • the location and height of proposed hoarding or temporary bunds to minimise visual and noise impacts • the siting of the temporary compound access to minimise road safety concerns with access to the compound • temporary and permanent highway works on Gammaton Road to address road safety concerns • siting of compound facilities such as the offices and welfare and the car park to minimise noise impacts associated with the daily operation of the compound. <p>The Applicant considered other field areas on the eastern side of River Torridge, connected to the onshore HVDC cable corridor but notes that these areas would have still required access via Manteo Way, and would require HGV access down Tennacott Lane.</p> <p>Compounds in these areas would also be closer to a larger number of residential properties, particularly the new housing development proposed south off Hillcrest Road (accessed via Gammaton Road).</p> <p>The Applicant is not aware of other suitably sized sites that meet the requirements for the main construction compound and are located within</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
		<p>close proximity to public transport and note that during discussions with Council no other potential sites were forthcoming which may be suitably close to public transport links. An assessment of noise and vibration generated during the construction phase of the Proposed Development has been carried out in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6). Further details can be found in Volume 2, Appendix 6.2: Construction Noise and Vibration, of the ES (Document Ref: 6.2.6.2).</p> <p>This assessment has found that noise and vibration associated with the construction phase are not expected to generate significant adverse effects.</p> <p>An assessment of dust generated during the construction and decommissioning phases is considered in Section 7.10 and Section 7.12, respectively, within Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7). Mitigation measures are outlined in Table 7.21, which would be implemented during construction and decommissioning to ensure that impacts from dust are reduced to levels that are not significant in EIA terms.</p> <p>As such, Volume 2, Chapter 7: Air Quality of the ES concludes that there would be no significant effects arising from the Proposed Development.</p> <p>A Dust Management Plan (DMP) will be prepared prior to construction, in accordance with the Outline DMP (Document Ref: 7.9) that forms part of the application for development consent. The Outline DMP comprises suitable measures based upon the Institute of Air Quality Management dust guidance (IAQM, 2024).</p>	
Cable installation			
Construction impacts	'Our house, Beech Cottage, is currently the closest property to the largest site along the whole cable route for drilling and for storage of vehicles, equipment and materials.'	The impact of construction noise from the construction of the converter station is considered in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6).	N

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Topic	Summary of comments	Response	Design change (Y/N)
	<p>Concern about impact on peace, health, and wellbeing. Concern about the impact of light, noise, and vibrations on children with sensory disabilities. Concern about the impact on chickens and ducks.</p> <p>Move the operations away to the side of the field furthest away from the house, 'but other approaches and/or compensation will also be needed'.</p>	<p>The predicted sound impact on Beech Cottage is predicted to be 52dB and is assessed to be of medium duration with a low magnitude of impact.</p> <p>There are no properties which are predicted to be subjected to high or medium noise impacts during the construction phase of the Converter Site or the Construction Compounds.</p> <p>The exact plant and location of the works are not yet known and thus there is a high degree of uncertainty to the significance of effects determined.</p> <p>This has been addressed by adopting precautionary thresholds and considering the distances at which the various effects might occur.</p>	
Hedgerows	<p>The cabling work will lead to a loss of hedgerows and biodiversity. BNG will not happen immediately.</p>	<p>Construction impacts on Devon hedgerows are considered in Section 1.10 within Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1). The approach to mitigation is set out in Section 1.8, including reinstatement of Devon Hedgerows and enhancement of habitat to increase connectivity across landscape.</p> <p>The construction of the cable route and road widening/access improvements would result in a temporary but medium-term impact on hedgerows (up to five years). Construction of the Converter Site would result in permanent loss of hedgerow. Additional hedgerows would be created as part of the landscape design package for the Converter Site.</p> <p>The Proposed Development is not subject to a mandatory net gain requirement under the Environment Act 2021. Nevertheless, the Applicants have engaged with statutory consultees to discuss the approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit.</p>	N
PRoW	<p>'How will the construction of on shore cable link be implemented? Cornborough is very isolated from roads! You would also be crossing the VERY important SW coast path !'</p>	<p>Impacts upon PRoW and the Tarka Trail are considered within the Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8).</p> <p>The use of Horizontal Direct Drilling (HDD) technology to install cable beneath the South West Coast Path, the Tarka Trail or National Cycle Route 3 would ensure that there would be no physical effects on the coastal recreational assets.</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
		<p>Construction vehicle access along the Onshore HVDC Cable Corridor will be provided via an internal haul road connecting to the highway network at four connection points – Cornborough Sewage Treatment Works; A39 at Abbotsham Cross; the A386 at the junction with the unnamed road to Littleham and at Gammaton Road. This will remove the need for HGVs to access construction work sites via country lanes.</p> <p>Construction of the Proposed Development will be managed through Onshore CEMPs developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7).</p>	
<p>Construction traffic</p>	<p>The proposed cabling route, Converter station construction together with construction traffic and access requirements will undoubtedly take its toll on our communities, roads and environment. It is therefore essential that these are managed responsibly with care and consideration to reduce any impact to an absolute minimum. Something not happening with the solar park construction underway at present.</p>	<p>This is noted.</p> <p>Construction of the Proposed Development will be managed through Onshore CEMPs developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7).</p> <p>Construction vehicle access along the Onshore HVDC Cable Corridor will be provided via an internal haul road connecting to the highway network at four connection points – Cornborough Sewage Treatment Works; A39 at Abbotsham Cross; the A386 at the junction with the unnamed road to Littleham and at Gammaton Road. This will remove the need for HGVs to access construction work sites via country lanes.</p> <p>Thorough communication with local residents and stakeholders will continue throughout construction. As outlined in the Outline Onshore Construction Environmental Management Plan (Document Ref: 7.7), a Community Liaison Group would be set up prior to construction and would continue through the construction phase of the Proposed Development as a formal forum for local issues to be raised. A Community Liaison Officer would be appointed to lead discussions with local communities, and also act as the primary point of contact should there be any queries or complaints.</p> <p>In addition, a Community Liaison Officer will be appointed to act as a dedicated point of contact for local stakeholders and would take a proactive approach to communications.</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
<p>Construction impacts</p>	<p>I am however concerned about problems arising from the cable route. I note in your PEIR report there is concern that nearby houses, cars, etc will be covered in dust, which means that people living close to the route won't be able to use their gardens and will need to keep their windows shut while the cable laying is going on. It will also be very noisy and doubtless cause vibration problems. I'm not sure how long it takes to lay each stage of the cable, obviously it depends on the terrain, but I wondered on average how many weeks work would be going on near houses.</p>	<p>An assessment of dust generated during the construction and decommissioning phases is considered in Section 7.10 and Section 7.12, respectively, within Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7).</p> <p>Construction of the Proposed Development would be managed through Onshore CEMPs developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7).</p> <p>We anticipate that the Cable Contractor will be able to complete between 100m-200m of cable trenching and duct laying works a day on average. This means that, with the exception of HDD locations, most cable works would be completed in front of a given property within a few days. The workers would then return between six and twelve months later to pull cable from joint bays. This work will only be noticeable where a joint bay is located outside a property.</p> <p>The proposed haul roads will remain in place during the whole extent of works in the Onshore HVDC cable corridor to enable construction vehicles to be kept off country lanes. Mitigation measures would include ensuring that an appropriate surface is constructed on the haul road that is maintained to minimise dust generation during use. Construction vehicle speed limits will also be reduced to minimise dust generation on the road.</p> <p>An assessment of noise and vibration generated during the construction phase of the Proposed Development has been carried out in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6). Further details can be found in Volume 2, Appendix 6.2: Construction Noise and Vibration, of the ES.</p> <p>This assessment has found that noise and vibration associated with construction traffic are not expected to generate significant adverse effects.</p>	<p>N</p>

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Cable route	Devon Wildlife Trust welcomes the approach of broadly re-using the onshore route developed through discussions with stakeholders for the Atlantic Array project. This project took a collaborative approach to determining the onshore cable route to avoid or minimise impact to sensitive environmental features.	This is noted.	N
Consultation			
Consultation	'We attended your exhibition at East the Water 31st June and firstly can I say were very impressed with the information available and the XLinks representatives.'	This is noted.	N
Future engagement	Any Community Liaison Group that is set up for construction and beyond risks having little influence – what safeguards will be in place to prevent this and how strong will they be?	<p>Thorough communication with local residents and stakeholders will continue throughout construction. As outlined in the Outline Onshore Construction Environmental Management Plan (Document Ref: 7.7), a Community Liaison Group would be set up prior to construction and would continue through the construction phase of the Proposed Development as a formal forum for local issues to be raised. A Community Liaison Officer would be appointed to lead discussions with local communities, and also act as the primary point of contact should there be any queries or complaints.</p> <p>In addition, a Community Liaison Officer will be appointed to act as a dedicated point of contact for local stakeholders and would take a proactive approach to communications.</p> <p>The size, scope and governance of a Community Liaison Group is under consideration by the Applicant in conjunction with key stakeholders, and relevant safeguards will be put in place to ensure the proper functioning of the group.</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
Consultation	I do not believe that any opposition would be of any worth or listened to but still feel I would like my voice heard and represented.	<p>This is noted. The Proposed Development has been the subject of three rounds of public consultation, including two non-statutory consultation and the statutory consultation preceding the DCO application.</p> <p>These consultations sought and received input from a variety of local stakeholder groups, including local authorities, land interests, prescribed consultees, and residents. The consultations have resulted in a number of changes being made to the Proposed Development, for instance the relocation of the proposed location for the converter stations to their current site at the Old Webbery Showground and changing the route of our cables around Abbotsham to avoid impacts on homes.</p>	N
Consultation	<p>'You have not made any effort to consult the wider community regarding this project. Areas such as Appledore, Northam, Bideford Town, East of the Water and the areas covering the road towards Hallsannery should be made aware of the project - not just the landowners and immediate residents affected.</p> <p>Most of the population living in these areas have no idea of this project and that they will be subjected to huge lorries carrying 55 tonne cables and the construction works that will be travelling along these very narrow and fragile roads. Our roads in this area are bad enough already with potholes before your lorries start to use them.</p> <p>You have been very vague in your information given to the landowners.'</p>	<p>There has been ongoing communication with landowners whose land the proposed cable route crosses, and opportunities have been offered and taken up to meet engineers in person so that landowners may voice concerns, ask questions and seek clarification on protections afforded them. The information gathered in these listening exercises have informed the compensations and protection offered to landowners within the cable easement agreements, with which the majority of landowners are in advanced stages of agreement through solicitor communications.</p> <p>The Proposed Development has been the subject of three rounds of public consultation, including two non-statutory consultation and the statutory consultation preceding the DCO application. These consultations sought and received input from a variety of local stakeholder groups, including local authorities, land interests, prescribed consultees, and residents. Notification of the community about the statutory consultation was conducted in line with the SoCC as set out in Chapter 6 of the Consultation Report (Document Ref: 5.1); the Applicant consulted relevant local authorities on notification areas as part of consultation on the SoCC as set out in Chapter 5 of the Consultation Report.</p> <p>The consultations have resulted in a number of changes being made to the Proposed Development, for instance the relocation of the proposed location for the converter stations to their current site at the Old Webbery</p>	N

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		<p>Showground and changing the route of our cables around Abbotsham to avoid impacts on homes.</p> <p>Opportunities for resident input are not limited to pre-application consultations, and we encourage local people who are interested in the Proposed Development to familiarise themselves with the significant level of detail which has been made available, and will continue to be made available as part of the DCO application.</p> <p>As part of the DCO application, we have produced several outline documents and strategies, including an outline onshore Construction Environment Management Plan (On-CEMP) and an outline onshore Construction Traffic Management Plan (CTMP). These documents set out the intention to provide access tracks ('haul roads') and improvements to the local highway network.</p>	
Consultation	<p>DWT welcomes the open nature of the discussions held around this project, with clear documentation, webinars and meetings. However, earlier contact from the project would have enabled greater input from DWT. As a small organisation with limited resources, responding to large infrastructure projects of this sort is a challenge and as such our response is necessarily limited.</p>	<p>This is noted.</p>	<p>N</p>
Cumulative impacts			
Cumulative impacts	<p>With multiple renewable energy projects seeking landfall in North Devon, we would expect to see coordination and a strategic approach to minimise risks and maximise benefits. Cable routes, landfall and connection point to the national grid should be built to enable a shared resource rather than each project repeating this process and having more impact. We recognise this approach is challenging and requires coordination from National Grid and other UK agencies, but there would be considerable public benefit through this.</p>	<p>We understand local concern regarding the cumulative effect of developments in the North Devon region. We are working to minimise as far as possible the effects on local communities, and our Environmental Statement outlines a series of mitigations to reduce this impact during construction, operation and decommissioning.</p> <p>In many cases it is not possible to coordinate fully with other projects due to differing scale, capacity and timelines. For example, the Applicant understands that White Cross Wind Farm is proposed to connect into East Yelland substation. Given that the Proposed Development is proposed to</p>	<p>N</p>

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		<p>connect into the National Grid at Alverdiscott Substation, it would not be possible for the two projects to share a cable route.</p> <p>The Proposed Development could not connect to East Yelland as that substation has a 33kV/132kV connection and not a 400kV connection as required. A connection to East Yelland would require significant upgrade of the existing substation and the construction of new 400kV overhead lines and towers to connect into the national grid.</p>	
Decommissioning			
Solar panel lifespan	How long will the solar panels last?	<p>No solar panels are to be installed in the UK as part of the Proposed Development.</p> <p>The projected lifetime of the Proposed Development is considered in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p> <p>As outlined in Section 3.14, the current anticipated lifetime of the Proposed Development (operational phase) is 50 years, following which the Proposed Development may be decommissioned. It is likely that this operational lifetime could be extended through refurbishment and the replacement of equipment, rather than decommissioning.</p>	N
Project lifetime	How long will the entire system be operational?	<p>The projected lifetime of the Proposed Development is considered in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p> <p>As outlined in Section 3.14, the current anticipated lifetime of the Proposed Development (operational phase) is 50 years, following which the Proposed Development may be decommissioned. It is likely that this operational lifetime could be extended through refurbishment and the replacement of equipment, rather than decommissioning.</p> <p>If the operation of the Proposed Development does not continue beyond 50 years, the converter stations would be decommissioned. If complete decommissioning is required, then all the electrical infrastructure and buildings would be removed and any waste arising recycled or disposed of</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
		in accordance with the waste hierarchy and relevant regulations at the time of decommissioning.	
Project lifetime	<p>We understand that there are no current decommissioning plans in place, and this is due to the intent to finalise the decommissioning methodology closer to the end of the projects' operational lifetime, in accordance with guidance, policies, and legislation at that time.</p> <p>However, DWT expects a commitment now that the full decommissioning plan will deploy the actions that will yield the greatest net environmental benefits at the time of decommissioning, in conjunction with analysis of the risks associated with the decay of artificial features. For example, where new high ecological value habitats have developed and are directly associated with infrastructure (e.g. reef habitats established on submerged rock armour), the retention of these features may provide long term net ecological benefits and would be retained. Further mitigation and BNG should also be applied at time of decommissioning.</p>	<p>The projected lifetime of the Proposed Development is considered in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p> <p>As outlined in Section 3.14, the current anticipated lifetime of the Proposed Development (operational phase) is 50 years, following which the Proposed Development may be decommissioned. It is likely that this operational lifetime could be extended through refurbishment and the replacement of equipment, rather than decommissioning.</p> <p>If the operation of the Proposed Development does not continue beyond 50 years, the converter stations would be decommissioned. The Applicant intends to conduct an EIA at the time of decommissioning to assess the most appropriate actions to take, as set out in the Outline Decommissioning Strategy (Document Ref: 7. 17). If complete decommissioning is required, then all the electrical infrastructure and buildings would be removed and any waste arising recycled or disposed of in accordance with the waste hierarchy and relevant regulations at the time of decommissioning.</p> <p>If decommissioning of the offshore cables is required, the options for decommissioning the cables would be evaluated at the time of decommissioning, with the available technologies of the time reviewed fully (in recognition that engineering technologies are ever evolving). The least environmentally damaging decommissioning option, is (in general) to de-energise the cable, disconnect it from any wider system, and secure it in place to be left in-situ, thereby avoiding unnecessary seabed disturbance. However, other options may include the requirement for full or partial removal of the cables.</p> <p>The framework of environmental permitting and all applicable UK and International legislation at the time of decommissioning would be adhered to. Once the final decommissioning measures are known, an environmental assessment (EIA or similar) would be performed prior to the</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
		decommissioning phase (i.e. in approximately 50 years' time) to assess the potential impacts that may arise. This would inform any licence applications for decommissioning.	
Ecology			
Ecology impacts	The landfall at Cornborough and the proposed cable route will decimate the areas flora and fauna, which will take years to recover. Will the regeneration plans in your brochure ever happen? We have a strong sentimental attachment to the area at Cornborough – it's doubtful that you care about that.	<p>Impacts of landfall at Cornborough are considered in Section 1.10 of Volume 2 Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), and in Volume 4, Chapter 2, Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>Significant effects have been identified for the impact on devon hedgerows, but mitigations are included in the Proposed Development design and a suitable aftercare strategy has been outlined in the above section.</p> <p>Significant effects have also been identified for the impact on dormouse populations. Mitigations for this include dead-hedging (creating a row of interconnected branches forming a continuous furrow) across gaps in hedgerows during periods when regular construction activity is not being undertaken. This should remain in place during all such periods and should also remain in place until hedgerow establishment is achieved. These measures are included in the Commitments Register (Document Ref: 3.1). In particular, measures are included as part of commitments ONS41, ONS54 and ONS55.</p> <p>Following mitigation, the effects of temporary and permanent habitat loss for dormice would be moderate adverse, which is considered significant in EIA terms.</p>	
Ecological buffers	We welcome the route design which avoids all designated sites. However, where designated sites (including County Wildlife Sites and Unconfirmed Wildlife Sites) lie adjacent to the proposed Draft Order limits, we would expect a suitable buffer of activities to prevent damage and disturbance of the setting of these sites.	<p>Where feasible, this approach will be considered, as set out in Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>Buffers of 15m have been stipulated adjacent to all retained woodlands (including woodlands forming stream banksides).</p>	N

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Downstream habitats	In addition, consideration should be given to avoiding/minimising potential impacts on sites downstream of works. For example, ensuring Culm grassland and wet woodland sites aren't impacted where works are occurring in the catchment upstream.	<p>The location of the Proposed Development crossing the Torridge estuary means that all significant Culm grassland sites are upstream of the Proposed Development (and most are significantly further to the west and inland), and therefore are unlikely to be affected by any potential contamination or other issues flowing downstream.</p> <p>Impacts on downstream habitats are considered in Section 1.10 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), with additional information in Volume 2, Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3) and Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions of the ES (Document Ref: 6.2.4).</p> <p>The impact on downstream habitats will primarily be minimised by the utilisation of trenchless techniques, including Horizontal Directional Drilling (HDD) beneath the watercourses crossed along the onshore cable route.</p>	N
Designated sites	Where designated sites (including County Wildlife Sites and Unconfirmed Wildlife Sites) lie adjacent to the proposed Draft Order limits, carrying out monitoring/survey of these sites to understand condition would provide public benefit.	<p>The Applicant has undertaken ecology surveys where required to inform the assessment of potential impacts from the project. Where relevant, this has included surveys of land adjacent to the Proposed Development to identify adjoining habitat types. The extent of surveys is detailed in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation (Document Ref: 6.2.1).</p> <p>Proposed monitoring is set out in Section 1.16 of the ES chapter, and includes proposals relating to protected species and condition of habitats in adjacent designated sites.</p>	N
Hedgerows	The project will impact hedges at a landscape scale. Ensuring connectivity is retained at a landscape scale for mobile species (including bats and dormice) during the seven years of construction will be critical. This can be achieved through a strategic plan which staggers hedge-breaks and ensures that multiple alternative routes are always available to mobile species at any given time.	<p>Construction impacts on Devon hedgerows are considered in Section 1.10 within Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1). The approach to mitigation is set out in Section 1.8, including reinstatement of Devon Hedgerows and enhancement of habitat to increase connectivity across landscape.</p> <p>The construction of the cable route and road widening/access improvements would result in a temporary but long term (construction</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
		<p>period up to seven years) impact. Construction of the Converter Site would result in permanent loss of hedgerow. Gaps in hedgerows would be reinstated on a like-for-like basis along the onshore cable corridor, and additional hedgerow will be created as part of the landscape design package for the Converter Site. This measure is listed in the Commitments Register (Document Ref: 6.1.3.1).</p>	
Hedgerows	<p>Where impacted hedgerows contain multiple older trees or is a hedge of particularly high ecological value, consider employing hedge translocation techniques (moving the entire hedge intact) to retain features for restoration to original position following works.</p>	<p>Where feasible, this approach will be considered, as set out in Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p>	N
Hedgerows	<p>While we welcome the intention to provide artificial bat corridors at hedge-breaks through the use of camouflaged Heras fencing, we would welcome evidence of the effectiveness of this approach. Where this is not forthcoming, monitoring to understand efficacy should be carried out with other innovative approaches considered if this is not effective.</p>	<p>This approach has been used with some success on other schemes with which the Applicant is familiar. Monitoring provision is set out in Section 1.16 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p>	N
Bats	<p>We disagree that approaches to maintain bat corridors at hedge-breaks is considered unnecessary during winter months. Weather conditions in SW England mean bats are active very late in the year and often do not hibernate. Additionally, where bats are active in colder months, ensuring landscape-scale connectivity is essential as energy efficiency is critical to survival. We advocate that any measures for bats are deployed year-round.</p>	<p>The Applicant has engaged with Natural England representatives during the pre-application process, particularly in relation to survey progress and the need for supplementary surveys including winter surveys, which have now been planned.</p> <p>The Applicant met with Natural England dormice and bat protection specialists on 21 October 2024 to discuss licencing requirements for the Proposed Development. The Applicant noted that draft protected species licences would be submitted to Natural England for agreement post application following the completion of supplementary surveys (following delayed land access). Natural England noted no in-principle objection to the timeframes for provision of draft licences and associated Letters of No Impediment, noting that these matters would need to be reviewed and agreed during the pre-examination and examination timeframes.</p> <p>Further detail is provided in Section 1.7 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
Bats	Large hedge trees (standards) are important as bat roosts but also as perches and navigation aids for bats. While we welcome the intention to retain veteran trees and to save old tree stools for re-planting, large standards should be planted and protected as part of restoration works.	Hedgerow enhancements beyond the reinstatement of damaged sections will offer opportunities for this, as set out in Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).	N
Dormice	While connectivity measures have been considered for bats, none have been considered for dormice. Consider the use of temporary dormouse bridges at hedge-breaks to facilitate safe crossing. These could be attached to the top of Heras fencing bat mitigation.	<p>Mitigation for dormice at hedgerow breaks consists of phased hedgerow clearance as set out in dormouse mitigation guidance and described in Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>The Onshore CEMP, developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7) will include mitigation measures to minimise impacts on ecology.</p> <p>The Applicant met with Natural England dormice and bat protection specialists on 21 October 2024 to discuss licencing requirements for the Proposed Development. A protected species licence for dormice will be sought from Natural England which will set out required mitigation.</p>	N
Noise	<p>We have concerns about noise and dust pollution affecting the wildlife on Woodville farm, especially the dense woods on the farm lying immediately north-west of the properties that are only a stones throw from the proposed construction compound.</p> <p>The proposed cable crosses this wildlife corridor and looks like it will pass through this small, wooded area containing a natural spring, and a small boggy biome as well as many ancient trees and hedges supporting rich biodiversity. It would be a devastating loss to the local biodiversity if this small, wooded area was compromised in any way or the woodland corridor was permanently disrupted.</p> <p>In discussion with your team, I learnt that in sensitive areas such as this, the gap made to accommodate the cable is limited to just 12 metres and every effort will be made to replace the lost biodiversity with like-for-like species once the cable is buried. This is certainly good to hear, but I wonder if there mightn't be a potential argument to be made</p>	<p>Impacts of noise and dust pollution are assessed in Section 1.10 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), and further in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6) and Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7).</p> <p>Overall, it is concluded that there will be no significant effects related to air pollution, arising from the Proposed Development during the construction, operation and maintenance or decommissioning phases.</p> <p>Impacts on this small woodland/former trackway are included in Section 1.10 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>The width of disturbance to the wooded area south of Woodville Farm will be minimised as far as reasonably practicable. Where possible, the haul road and Onshore HVDC cable corridor will be co-located to reduce the width of vegetation removal.</p>	N

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Topic	Summary of comments	Response	Design change (Y/N)
	in considering moving the cable and haul road a short distance (10-20 metres) to the south-west so that it misses/bypasses this small, wooded area/wildlife corridor?		
Impact on watercourses	Beyond our immediate vicinity we also have general concerns about how the haul road will affect Gammaton reservoirs and woodland, and the fishing lakes and woodland at Tarka Swims. Again, noise and dust pollution on the prevailing winds over many years will likely have negative impacts on these resources.	<p>The Tarka Swims lakes are located within an area where no potential contaminant sources have been identified and the potential for pollutant linkages to become active is low. Details are provided within Volume 2, Appendix 4.1: Desk Top Study, Preliminary Risk Assessment and Site Reconnaissance of the ES (Document Ref: 6.2.4.1).</p> <p>Run off will be managed through the implementation of measures identified within the Onshore CEMP and Pollution Prevention Plan (PPP), which will be developed in accordance with the Outline Onshore CEMP and Outline PPP (Document Ref: 7.7). Potential noise impacts will also be managed through mitigation outlined in the Onshore CEMP.</p> <p>An assessment of dust generated during the construction and decommissioning phases is considered in Section 7.10 and Section 7.12, respectively, within Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7). Mitigation measures are outlined in Table 7.21, which would be implemented during construction and decommissioning to ensure that impacts from dust are reduced to levels that are not significant in EIA terms.</p> <p>As such, Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7) concludes that there would be no significant air quality or dust effects arising from the Proposed Development.</p> <p>A Dust Management Plan (DMP) will be prepared prior to construction, in accordance with the Outline DMP (Document Ref: 7.9) that forms part of the application for development consent. The Outline DMP comprises suitable measures based upon Institute of Air Quality Management (IAQM) dust guidance (IAQM, 2024).</p>	N
Hedgerows	Hedge disturbance is a of concern to us. In consideration of potential future increased traffic flow and damage to precious hedgerow, we	The Applicant has sought to reduce or avoid disturbance to hedgerow where possible. Widening of Gammaton Road is selective only to allow the passage of abnormally large vehicles. There will not be widening of	N

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	<p>would only support a carefully considered minimal widening just at particular pinch points and bends</p>	<p>Gammaton Road over its full length. The onshore cable corridor is proposed to narrow at points where it crosses hedgerow. The methods proposed for mitigating hedgerow impacts are set out in Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1). Phased hedgerow clearance, to comply with best practice for dormice (and ensure minimum impact on nesting birds) is proposed.</p> <p>Gaps in hedgerows in the onshore cable corridor would be reinstated on a like-for-like basis, and additional hedgerow will be created as part of the landscape design package for the Converter Site. Selected hedgerows will also be subject to enhancement and where feasible re-connection into the existing hedgerow network. This measure is listed in the Commitments Register (Document Ref: 6.1.3.1).</p>	
<p>Ecological impacts</p>	<p>Neither is digging up miles of countryside and hedgerows disturbing dormice, bats, foxes, badgers, newts and the large number of lapwings we have.</p>	<p>The methods proposed for managing hedgerow impacts are set out in Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>Phased hedgerow clearance, to comply with best practice for dormice (and ensure minimum impact on nesting birds) is proposed.</p> <p>Gaps in hedgerows would be reinstated on a like-for-like basis, and additional hedgerow will be created as part of the landscape design package for the Converter Site. Selected hedgerows will also be subject to enhancement and where feasible re-connection into the existing hedgerow network.</p> <p>The Proposed Development is located outside of the Devon Great Crested Newt Consultation Zones, so Great Crested Newt surveys were not required, and this species has not been considered further in the EIA assessment.</p> <p>Section 1.10 of the ES chapter considers the impacts on badgers of the proposed development to be 'minor adverse', which is not significant in EIA terms.</p>	<p>N</p>

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		<p>Impacts on bats are also considered in Section 1.10 of the ES chapter. Following mitigation, under the worst-case scenario adopted for EIA purposes, a moderate adverse effect, which is significant in EIA terms, is predicted.</p> <p>New woodland planting (in addition to hedgerows) would be created as part of the landscape design package for the Converter Site which provides additional habitat for bats.</p>	
Engagement	Please liaise with local wildlife trusts.	<p>This is noted.</p> <p>Comments from Devon Wildlife Trust have been addressed in this appendix and in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p>	N
Screening	Screen the sites to ensure there are no noise issues.	<p>Mitigation measures to reduce the impact of noise and vibration from the construction compounds and the converter station are outlined in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6).</p> <p>The following noise control measures will be considered in the design of the converter stations.</p> <p>The orientation and layout of the converter stations will be considered in order to minimise noise levels at nearby receptors.</p> <p>Quieter equipment will be selected, where available and practicable and mitigation measures such as acoustic barriers and enclosures will be specified where necessary.</p> <p>Earth bunds will be created around the Converter Site as part of the ground works required during site preparation. These are an inherent mitigation feature for the site and aid to screen receptors from operational noise.</p>	N
Ecological enhancements	There could be opportunities to enhance the local biosphere when carrying out remedial works after installation.	Habitat enhancements are discussed in Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).	N

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		<p>The design of the Proposed Development includes mitigation measures to avoid, minimise and compensate for impacts on ecology and nature conservation. The Proposed Development design has taken into account the hierarchy of mitigation actions, which include the following:</p> <p>compensation for unavoidable impacts (e.g. full like-for-like replacement of hedgerows impacted by corridor); and</p> <p>enhancement measures (e.g. enhancement of hedgerows and additional tree planting at selected locations along the Onshore Infrastructure Area).</p>	
Biodiversity	<p>XLinks should consider use of the land south of Gammaton Cross as part of their LEMP so as to achieve a net gain in biodiversity</p>	<p>The Proposed Development is not subject to a mandatory net gain requirement under the Environment Act 2021. Nevertheless, the Applicant has engaged with statutory consultees to discuss the approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit.</p> <p>We have had conversations with landowners about opportunities for using their land for planting as part of our commitment to explore opportunities for BNG and will continue to follow up on these as the Proposed Development progresses. We have also had conversations with North Devon Biosphere about opportunities to support programmes they are supporting or implementing with regard to biodiversity net gain.</p> <p>Our approach to biodiversity enhancement is set out in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), Section 1.8. This includes habitat creation at the Converter Site, including features which increase connectivity with habitat features beyond the site. This also provides mitigation habitat for protected species such as dormice, bats and breeding birds. This approach is also present in habitat creation areas to be formed in blocks to either side of the Torridge Estuary and further hedgerow enhancements along the HVDC cable route.</p>	N
Biodiversity	<p>Reinstatement to existing conditions seems to be the approach to biodiversity. As we are one of the most biodiversity depleted nations on earth, reinstatement to what are effectively wildlife deserts in some cases is not acceptable. The stated aim should be to create an</p>	<p>The Proposed Development is not subject to a mandatory net gain requirement under the Environment Act 2021. Nevertheless, the Applicants have engaged with statutory consultees to discuss the</p>	N

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	<p>enhanced wildlife corridor around Bideford to make the most of the opportunity.</p> <p>This would involve detailed consultation and agreement with landowners along the route (and not all may agree), but would be part of your strategy to 'sell' the project to the community. It is critical that any biodiversity net-gain is along the corridor, rather than in other areas</p>	<p>approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit.</p> <p>The approach to biodiversity enhancement is set out in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), Section 1.8.</p> <p>XLinks will not retain permanent possession of the Onshore HVDC Cable Corridor and are bound to return the land to its previous agricultural use. However, we will work with landowners to seek further enhancements within the Order Limits where practicable. This will be targeted at boundary vegetation with links to high value woodland habitat.</p> <p>Volume 2, Chapter 1; Ecology and Nature Conservation of the ES (Document Ref: 6.2.1) at Figure 1.4 shows where those immediate opportunities lie.</p>	
Ecological enhancements	<p>This is a beautiful area which is under pressure from people moving in and tourism – businesses like XLinks should take every opportunity to enhance the local biosphere.</p>	<p>Approach to biodiversity enhancement is set out in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), Section 1.8. XLinks will not retain permanent possession of the Onshore HVDC Cable Corridor and are bound to return the land to its previous agricultural use.</p> <p>However, we will work with landowners to seek further enhancements within the Order Limits where practicable. This will be targeted at boundary vegetation with links to high value woodland habitat. Volume 2, Chapter 1; Ecology and Nature Conservation of the ES (Document Ref: 6.2.1) at Figure 1.4 shows where those immediate opportunities lie.</p>	N
Biodiversity	<p>Consult with local stakeholders that care about local biodiversity, e.g. National Trust, Butterfly Conservation, BTO (British Trust for Ornithology), RSPB, Surfers against Sewage. They have schemes in place that need funding.</p>	<p>Comments have been sought from these organisations Volume 2, Appendix 1.2: Ecological Desk Study of the ES (Document Ref: 6.2.1.2).</p> <p>The Applicant is continuing work to develop a community benefit package that responds to local need and will share more information later this year. We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop</p>	N

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		our plans to leverage where possible the good existing community work which is already underway.	
Ecological impacts	Construction will destroy the rural nature of the area and lead to habitat loss, bats especially. Five years is not sufficient to replace what will be lost.	<p>Issues relating to biodiversity and additional habitat creation as understood at this stage are set out in Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>The Applicant's approach to biodiversity enhancement is set out in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), Section 1.8. This includes habitat creation at the Converter Site, including features which increase connectivity with habitat features beyond the site. This also provides mitigation habitat for protected species such as dormice, bats and breeding birds. This approach is also present in habitat creation areas to be formed in blocks to either side of the Torridge Estuary and further hedgerow enhancements along the HVDC cable route.</p> <p>An aftercare monitoring period of five years would be put in place to monitor progress towards re-establishment of Devon hedges post construction period. Under careful management, hedgerows are able to recover reasonably quickly, and while gaps may take some time to regain a full species complement and structure, they are likely to recover their connective value relatively quickly.</p> <p>Issues related to construction impacts, mitigation and post-construction monitoring are assessed in Section 1.10 of the same ES chapter.</p>	N
Habitat creation	Habitat creation will need to be carefully considered and serve the needs of the affected communities.	<p>The Applicant's approach to biodiversity enhancement is set out in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), Section 1.8.</p> <p>XLinks will not retain permanent possession of the Onshore HVDC Cable Corridor and are bound to return the land to its previous agricultural use. However, we will work with landowners to seek further enhancements within the Order Limits where practicable.</p>	N

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		<p>This will be targeted at boundary vegetation with links to high value woodland habitat. Volume 2, Chapter 1; Ecology and Nature Conservation of the ES (Document Ref: 6.2.1) at Figure 1.4 shows where those immediate opportunities lie.</p>	
Cable route	<p>'Temporary use zone on the south at Cornborough looks like it may destroy the only remaining site in North Devon for the grass <i>Koeleria macrantha</i>. The cable route looks set to disrupt sensitive habitats on the western shore of the Torridge'.</p>	<p>Use of trenchless techniques including HDD at landfall and Estuary and major road crossings will serve to avoid sensitive habitats on the coastal margin and estuary and will reduce impacts on traffic congestion.</p> <p>The landfall grassland has not been surveyed, as access is not permitted until after the flowering season). The record of <i>Koeleria macrantha</i> is expected to be from the County Wildlife Site (CWS), but there is uncertainty regarding the grassland that will be affected. A pre-commencement survey will take place as well as subsequent translocation ahead of construction if the grass is present and cannot be avoided.</p> <p>The woodland adjoining western bank of River Torridge and on either side of the A386 will be protected through use of HDD, resulting in no habitat loss.</p> <p>Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3) provides detail on HDD crossing locations.</p> <p>Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1) considers impacts on habitats and wildlife. No significant effects are predicted for locally designated sites, as discussed in Section 1.10.</p>	N
Habitat enhancement	<p>For enhancement, consider linking up and enhancing existing wildlife corridors, e.g. meadow, woodland, hedge, when restoring disturbed areas.</p>	<p>The Applicant's approach to biodiversity enhancement is set out in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), Section 1.8. This includes habitat creation at the Converter Site, including features which increase connectivity with habitat features beyond the site. This also provides mitigation habitat for protected species such as dormice, bats and breeding birds. This approach is also present in habitat creation areas to be formed in blocks to either side of the</p>	N

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		<p>Torridge Estuary and further hedgerow enhancements along the HVDC cable route.</p> <p>The Applicant is required to return land used for the construction of the Onshore HVDC cable corridor to current landowners to continue their agricultural operations. Where reasonably practicable, we are including enhancement of existing hedgerows to provide improvement to the existing biodiversity along the corridor. We are also in discussions with a landowner to provide a new area of woodland planting on the eastern side of the River Torridge (adjoining existing woodland) and the outcome of these discussions will be concluded during examination.</p>	
Seed sourcing	Source seeds locally where possible during restoration. Talk to DWT.	<p>Devon Wildlife Trust have provided comments on the Proposed Development, and their comments are included in Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>Seeds of local provenance will be used, where possible, for reinstatement, enhancement and habitat creation, as set out in Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p>	N
Habitat enhancement	<p>We welcome the proposals to enhance habitats and the commitment to 'a greater than 10% net gain'. DWT advocates that projects set a minimum 20% net gain to ensure action to reverse the decline of nature, particularly in areas with high nature value as found in this area. The opportunity to create a linear corridor of species-rich habitat across the whole site would make this very achievable.</p>	<p>The Proposed Development is not subject to a mandatory net gain requirement under the Environment Act 2021. Nevertheless, the Applicants have engaged with statutory consultees to discuss the approach and inform design, allowing for the development of mitigation and enhancement to maximise biodiversity benefit.</p> <p>Approach to biodiversity enhancement is set out Section 1.8 of the ES chapter. This includes habitat creation at the Converter Site, including features which increase connectivity with habitat features beyond the site. This also provides mitigation habitat for protected species such as dormice, bats and breeding birds. This approach is also present in habitat creation areas to be formed in blocks to either side of the Torridge Estuary and further hedgerow enhancements along the HVDC cable route.</p>	N

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		<p>The Applicant is required to return land used for the construction of the Onshore HVDC cable corridor to current landowners to continue their agricultural operations. Where reasonably practicable, we are including enhancement of existing hedgerows to provide improvement to the existing biodiversity along the corridor. We are also in discussions with a landowner to provide a new area of woodland planting on the eastern side of the River Torridge (adjoining existing woodland) and the outcome of these discussions will be concluded during examination.</p> <p>We are also continuing discussions with local landowners and the North Devon Biosphere on potential offsite opportunities to establish, or contribute to biodiversity enhancement programmes and/or biodiversity net gain.</p>	
<p>Habitat enhancement</p>	<p>Many kilometres of cable routes (14km at 65m wide onshore; 370km at 500-1500m wide offshore) provide a valuable opportunity for the creation of linear corridors of species-rich habitats with designations that could provide long term protection of habitats and species. This should be the expectation rather than replacing degraded or species-poor habitats like-for-like. As cabling is only 1-1.5m deep this also provides better security both on land and at sea (e.g. by banning high risk activities such as bottom-towed gear offshore and ploughing/poaching onshore) and could help deliver LNRS objectives at relatively low cost. The BNG benefits are also obvious.</p>	<p>The Applicant is required to return land used for the construction of the Onshore HVDC cable corridor to current landowners to continue their agricultural operations. Where reasonably practicable, we are including enhancement of existing hedgerows to provide improvement to the existing biodiversity along the corridor. We are also in discussions with a landowner to provide a new area of woodland planting on the eastern side of the River Torridge (adjoining existing woodland) and the outcome of these discussions will be concluded during examination.</p> <p>We are also continuing discussions with local landowners and the North Devon Biosphere on potential offsite opportunities to establish, or contribute to biodiversity enhancement programmes and/or biodiversity net gain.</p> <p>Reinstatement and enhancement of hedgerows is set out in Section 1.8 of the Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>Protected habitats offshore are avoided via initial avoidance of marine protected areas (routing of the Offshore Cable Corridor) followed by micro-routing to avoid identified Annex I Reef habitats identified by Proposed Development surveys. Micro-routing also allows preservation in-situ for</p>	<p>N</p>

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		e.g. potential archaeological features identified by Proposed Development survey. It is recognised that introduced, inert rock cable protection can over time provide diversity of habitat and improve local biodiversity offshore (acting as reef substrate), however the Environmental Statement adopts the approach currently advocated by the SNCBs i.e. that habitat types are to be maintained where possible and habitat change is not promoted as net gain. The point regarding establishing a corridor of effective (or partial) exclusion from bottom-towed fishing is not quantified or promoted as a net gain, but is noted here.	
Habitat restoration	Habitat restoration ecology is a niche expertise. While we recognise the intention to have an Ecological Clerk of Works present during the construction phase, a habitat restoration specialist should be employed to oversee all restoration works and ensure it is effectively managed through its key early phases with long term management secured.	This is noted. As set out in Section 1.8 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1), contractors with previous experience of successful Devon hedgerow creation would be sought to undertake hedge reinstatement and creation works where reasonably practicable.	N
Future engagement	Results of all ecological surveys and monitoring should be shared with Devon Biodiversity Records Centre in appropriate format to inform future conservation activities.	The results of ecology surveys will be become public upon submission of the DCO application. The Applicant is happy to share ecology survey details (with the exception of redacted records) with the Devon Biodiversity Records Centre.	N
Environmental impacts - general			
Site selection	Why have you routed the cable into an AONB?	The Applicant has worked with National Grid to identify a suitable location for the Project to connect into Great Britain's electricity transmission system. The route that the Applicant needs to take cables around Spain and Portugal means this search focused on the South West of England and Wales. Locations considered as part of this process included Alverdiscott, Pembroke in South Wales, Seabank near Bristol, Indian Queens near Newquay and Exeter. The Applicant's work alongside National Grid identified Alverdiscott National Grid Substation as the preferred option for connecting the Project into the grid. This is because it had sufficient space close to the point of connection for the converter	N

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		<p>stations and a lower risk of interactions with nearby infrastructure. Further information is presented in Volume 1, Chapter 4: Need and Alternatives of the ES (Document Ref: 6.1.4).</p> <p>The location and siting of the onshore elements of the Proposed Development have been informed by a site selection and route refinement process, which is set out within the Project Development and Considerations of Options document appended to the Planning Statement (Document Ref: 7.2) and in Volume 1, Chapter 4: Need and Alternatives of the ES (Document Ref: 6.1.4). This process has considered a wide range of environmental constraints as well as technical and commercial factors.</p> <p>While there were advantages identified for both options, Cornborough was preferred over Peppercombe because Peppercombe has steeper topography that affects site access, duct stringing, beach access, the topography allows a consistent depth of cover below bedrock, and it also has less consistent geology with a greater risk of drilling difficulties.</p> <p>The potential visual impacts on the North Devon Coast National Landscape (formally AONB) during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>No fabric of the coastal landscape would be impacted, as the coastal area would be crossed using trenchless techniques, such as HDD. There would be a temporary impact on coastal views, as the construction works at the Landfall would, in part, take place from the barge located in the sea. The direct impact on coastal views would be of local geographic extent, short-term and temporary.</p> <p>There would be a temporary impact on seaward views, as the construction works at the Landfall would, in part, take place from the barge located in the sea. The direct impact on coastal views would be of local geographic extent, short-term and temporary.</p> <p>There would be a temporary impact of views from elevated land towards the landfall and Onshore HVDC Cable Corridor within the North Devon</p>	

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		<p>Coast NL. The direct impact on inland views would be of local geographic extent, short-term and temporary.</p> <p>There would be a temporary impact on tranquillity as the construction works at the Landfall take place from the barge located in the sea and the works at the landward side, at the transition joint bays and construction compounds would also be visible. The direct impact on tranquillity would be of local geographical extent, short-term and temporary.</p>	
Environmental impacts	<p>Environmental impacts must not be exported to other territories with lower levels of protection. The whole project should be subject to the standards, scrutiny and approaches used in the UK (or other country crossed by the project where standards are higher) to ensure lowest environmental impact and greatest level of BNG.</p>	<p>The Project is securing the relevant consents and permissions in every jurisdiction that it is operating in, including Morocco, Portugal, Spain, France and the United Kingdom. Details of these consenting processes are set out in Other Consents and Agreements (Document Ref: 7.2.1).</p> <p>The Applicant works to the Equator Principles in all jurisdictions. These serve as a common baseline and risk management framework for financial institutions to identify, assess and manage environmental and social risks when financing projects and means that the Applicant works to the highest standards across all parts of the Project.</p>	N
Biodiversity	<p>It is unrealistic or inaccurate to assess Operational Effects as beneficial except where a greater than 10% (ideally 20% or greater) net gain can be demonstrated.</p>	<p>Assessment of operation and maintenance impacts are addressed in Section 1.11 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>Under a precautionary approach the Operational Effects (at the Converter Site) are assessed as having negligible magnitude and of negligible significance for the majority of IEFs with replacement of habitats that will be lost and the establishment of the landscaping which will provide alternative habitat for species using the existing habitats in this location. The original conclusion of a beneficial was reached due to a suite of off-site habitat creation opportunities that were available to the Applicant, but which are no longer possible.</p> <p>The Applicant is required to return the land used for the construction of the Onshore HVDC cable corridor to the existing agricultural use. Wherever possible, localised biodiversity enhancements are being brought forward</p>	N

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		<p>within the Proposed Development, with the conversion of agricultural land into neutral grassland or woodland.</p> <p>More broadly the Applicant is in discussions with North Devon Biosphere about off-site habitat compensation opportunities; for example, supporting culm grassland restoration which could achieve biodiversity compensation through targeted interventions benefiting a habitat of regional/national importance).</p>	
Habitat surveys	<p>Access has not been available to carry out wildlife surveys on a number of areas within the proposed Draft Order limits. While we recognise the efforts to survey around these sites and examine historic records (e.g. 2013 Atlantic Array studies), it is imperative that these sites are fully surveyed prior to any works commencing. This is particularly important at large components of the project such as the Converter site, Alverdiscott Substation and the landfall site.</p>	<p>Additional ecological surveys have been completed since the PEIR. Further surveys are required on land where access has been restricted and these surveys have been discussed with Natural England. The supplementary survey data will be presented during the examination period at relevant deadlines.</p>	N
Monitoring	<p>Monitoring of species and habitats should be ongoing during construction phase to ensure impacts from noise, light, disturbance, and pollution can be understood and managed to avoid/minimise potential impacts. For example, additional screening may be required at HDD sites if noise or light impacts are greater than anticipated.</p>	<p>As set out in the Outline On-CEMP (Document Ref: 7.7), a dedicated and suitably qualified Ecological Clerk of Works (ECoW) for the Proposed Development will be employed to ensure that construction activities comply with the On-CEMP and LEMP. This includes monitoring measures, including pre-commencement surveys and regular monitoring during the construction phase of the Proposed Development across a range of potential impacts are set out in Section 1.16, Table 1.18 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p>	N
Flood risk			
Flood risk	<p>As Robin Hill Farm sits below farm fields various features i.e. drainage traps and underground drainage pipes have been built at Robin Hill Farm to channel run off water (often very muddy water) away from the property. These have been built with the natural slope and gradient of the farmland in mind and natural course of the water. Excavating the</p>	<p>Flood risk analysis is set in Section 3.10 of Volume 2 Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3).</p> <p>Overall, it is concluded that there will be no significant effects arising from the Proposed Development during the construction, operation and maintenance or decommissioning phases.</p>	N

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	land and HGV vehicles travelling across it will almost certainly disrupt the natural flow of this water.	The Onshore CEMP will incorporate pollution prevention and flood response measures to ensure that the potential for any temporary effects on water quality or flood risk are reduced as far as practicable during the construction stage.	
Flood risk	The necessary widening of Gammaton Road, and the construction nearby raise issues related to runoff into the adjacent reservoir.	<p>Flood risk analysis is set in Section 3.10 of Volume 2 Chapter 3: Hydrology and Flood Risk of the ES (Document Ref: 6.2.3). Overall, it is concluded that there will be no significant effects arising from the Proposed Development during the construction, operation and maintenance or decommissioning phases.</p> <p>The Onshore CEMP will incorporate pollution prevention and flood response measures to ensure that the potential for any temporary effects on water quality or flood risk are reduced as far as practicable during the construction stage. Such measures would be implemented through the On-CEMP(s) as set out in the Outline On-CEMP (Document Ref: 7.7)</p> <p>Drainage requirements for the proposed Gammaton Road widening would be confirmed in consultation with Devon County Council as part of the approval of the highway works by DCC as the local highway authority and lead local flood authority.</p>	N
Funding			
Financial risk	The project has a high level of financial risk. If the business case changes, mitigation measures will be cut from the Proposed Development. There must be planning conditions to prevent this.	Project funding, and a demonstration that funding will not be an impediment to delivery, is demonstrated in the Funding Statement submitted as part of the DCO application (Document Ref: 4.2)	N
Funding	XLinks Directors are seeking UK Government support through Contract for Difference support ¹ . XLinks are requesting way over the standard guarantee price for electricity and for an extended period of 25 years as opposed to the standard 15 years. This attitude of entitlement to extra funds essentially to finance overseas development is not in the interest of the UK. It is likely that energy prices will fall in the medium to long term and the XLinks CFD request will leave the UK trapped in a position	<p>Funding for the Proposed Development represents investment into the UK. CfDs have been awarded for terms ranging from 15 years to 35 years. CfD terms are, in part, influenced by the design life and debt tenure of a project, and remain at the discretion of the Secretary of State. Therefore, the Applicant views a term of 25 years as consistent with existing precedent.</p> <p>Different low-carbon projects are categorised by different generation profiles and levels of flexibility which can either increase or decrease the</p>	N

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	<p>paying over the market rate for imported electricity for a quarter of a century.</p>	<p>non-commodity costs that electricity consumers pay. Therefore, the relative strike price a project is awarded does not necessarily directly translate into higher or lower consumer bills.</p> <p>CfD strike prices in the most recent Allocation Round ranged from £50.7/MWh to £172/MWh whereas the Applicant is seeking a CfD in the range of £70-80/MWh. The Project is currently being assessed in line with His Majesty's Treasury's Green Book Process and is currently in the Outline Business Case stage to ensure the Project provides value for money.</p> <p>Despite the energy generation assets being located in Morocco, the energy generated will be exclusively directed to the UK, providing clean, affordable and reliable energy to UK consumers and businesses.</p>	
<p>Funding</p>	<p>UK electricity bill payers, many of whom are in energy poverty, are paying one of the highest rates in Europe and should only be supporting additional UK renewable generation through the renewable “tax” element of their electricity charges and not subsidising overseas generators. Alternatively, additional generation assets in the UK would keep this investment in the UK</p>	<p>We anticipate that downward pressure on electricity prices will be exerted by the integration of the Proposed Development, and the wider Project, into the UK electricity supply. The Project has the capacity to power 7 million homes, meeting 8% of the UK's energy needs, helping reduce reliance on oil and gas imports and the price spikes we experience from those.</p> <p>A lot of power is already imported into the UK, including 20% of electricity demand in Q2 2024. This project helps to bring clean reliable power, on a dedicated supply, with a long-standing UK partner.</p> <p>And while we believe that we should maximise the UK's domestic renewables opportunity, we will need a more diverse mix of reliable, affordable and green power is key to keeping the UK running in the coming years as our energy system, transport and homes become increasingly electrified, and demand for electricity continues to grow.</p> <p>The power generated as part of the Project would complement the energy we already generate from the sun and wind in the United Kingdom. When domestic renewable energy generation in the UK drops due to low winds and short periods of sun, the Project can provide access to the benefits of long hours of sun and consistent winds in Morocco to provide a firm but</p>	<p>N</p>

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Topic	Summary of comments	Response	Design change (Y/N)
		flexible source of zero-carbon electricity. The inclusion of a 22.5GWh/5GW battery facility in Morocco means this energy would be reliably available when it's most needed in Great Britain. The Morocco-UK Power Project will be an important contributor to a well-balanced grid. Despite the energy generation assets being located in Morocco, the energy generated will be exclusively directed to the UK, providing clean, affordable and reliable energy to UK consumers and businesses.	
Delivery	<p>'We feel that XLinks will do all the work it can to get the project approved and then it will sell the project to another company who will renege on all of its promises.</p> <p>XLinks should be made to guarantee that this will not happen.</p> <p>It is Estimated that the project will cost £24 Billion.</p> <p>We all know that once digging starts the costs start to rise and like all these large projects the costs double and then triple before construction is finished. Look what happened to HS2 and Hinkley Power Station.'</p>	<p>Project funding, and a demonstration that funding will not be an impediment to delivery, is demonstrated in the Funding Statement submitted as part of the DCO application (Document Ref: 4.2)</p> <p>Mitigations and benefits associated with the Proposed Development will be secured as part of the DCO and will not be contingent on any future governance changes within the project.</p>	N
Grid connection			
National Grid	Coordinate with National Grid to accommodate the project and the substation – the public will be more likely to trust XLinks.	<p>The Alverdiscott Substation Connection Development is referenced in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3). The development is required at the existing Alverdiscott Substation Site, to include development of a new 400 kV substation, and other extension modification works to be carried out by National Grid Electricity Transmission.</p> <p>The Applicant has engaged with National Grid in relation to the development of the existing Alverdiscott Substation Site. At National Grid's request, the upgrade has been removed from the scope of the Proposed Development and will be developed and constructed separately by National Grid. The upgrade works have been assessed as part of the cumulative assessment in the Environmental Statement.</p>	N
National Grid	XLinks has to have an extension to the power station by National Grid to accommodate the new power source. Whilst XLinks also reassures	The Alverdiscott Substation Connection Development is referenced in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).	N

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	<p>us that the necessary extension to the National Grid station will be within its 'existing boundary' there was no confirmation by National Grid of this or of the noise/disruption of its works which could also be significant. The reliance on the National Grid plans is clear but there is been little or no reassurance from National Grid of its plans in this symbiotic relationship with XLinks. Surely XLinks planning cannot be agreed without also agreeing the scope and terms of the National Grid changes?</p>	<p>The development is required at the existing Alverdiscott Substation Site, to include development of a new 400 kV substation, and other extension modification works to be carried out by National Grid Electricity Transmission.</p> <p>The Applicant has engaged with National Grid in relation to the development of the existing Alverdiscott Substation Site. At National Grid's request, the upgrade has been removed from the scope of the Proposed Development and will be developed and constructed separately by National Grid.</p> <p>The upgrade works have been assessed as part of the cumulative assessment in the Environmental Statement. The upgrade works will be subject to a separate planning application, which will include full assessment of related impacts.</p>	
<p>National Grid</p>	<p>'You promised to set up a public meeting with National Grid to answer questions from the local community regarding the reasons for choosing this route. To date you have not given us a logical reason why you have chosen this route. It would be much cheaper and less destructive to our local Marine Life to go in at the South Coast.'</p>	<p>The Applicant notes that a request was made at a local community meeting in June 2023 for XLinks to provide evidence behind the NGET connection offer decision process or to set up a meeting with NGET and the community.</p> <p>The Applicant explained that this process was governed by NGET methodology and further information on this would need to be provided by direct communication with NGET. The meeting organiser advised the community that he would try to facilitate a meeting between the community and NGET, however the Applicant is not aware whether this has occurred.</p> <p>Further details on the NGET decision process are provided in Annex 2 of the Planning Statement (Document Ref: 7.2).</p> <p>Aspects related to the location of the Proposed Development are considered in Volume 1, Chapter 3: Project Description of the ES (Document Ref: 6.1.3).</p> <p>Alternatives to the Proposed Development are considered Volume 1, Chapter 4: Need and Alternatives of the ES (Document Ref: 6.1.4).</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
		<p>We worked with National Grid to identify a suitable location for the Project to connect into Great Britain's electricity transmission system. The route that we need to take cables around Spain and Portugal means this search focused on the South West of England and Wales.</p> <p>Our work alongside National Grid identified Alverdiscott National Grid Substation as the preferred option for connecting the Project into the grid. This is because it had sufficient space close to the point of connection for the converter stations, a lower risk of interactions with nearby infrastructure and required less expenditure on upgrading the grid.</p>	
Human health			
Mental health	<p>The impact that noise from the construction compound at Gammaton Road could have on our mental health and wellbeing is already being felt as a significant anxiety</p>	<p>The Applicant understands the concerns raised by the resident in relation to the location of the Gammaton Road compound which sits directly opposite their property.</p> <p>We recognise that the prospect of being impacted by this change is stressful and can cause anxiety. In order to mitigate this, we will be maintaining communications with residents throughout the development process, construction and operation of the project.</p> <p>The Applicant will work closely with the residents to design and implement mitigation measures within the construction compound to minimise impacts on this property.</p> <p>This includes working with the residents to review:</p> <ul style="list-style-type: none"> the location and height of proposed hoarding or temporary bunds to minimise visual and noise impacts the siting of the temporary compound access to minimise road safety concerns with access to the compound temporary and permanent highway works on Gammaton Road to address road safety concerns 	N

Topic	Summary of comments	Response	Design change (Y/N)
		<p>siting of compound facilities such as the offices and welfare and the car park to minimise noise impacts associated with the daily operation of the compound.</p> <p>An assessment of noise and vibration generated during the construction phase of the Proposed Development has been carried out in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6). Further details can be found in Volume 2, Appendix 6.2: Construction Noise and Vibration, of the ES (Document Ref: 6.2.6.2).</p> <p>This assessment has found that noise and vibration associated with the construction phase are not expected to generate significant adverse effects.</p> <p>An assessment of dust generated during the construction and decommissioning phases is considered in Section 7.10 and Section 7.12, respectively, within Volume 2, Chapter 7: Air Quality of the ES (Document Ref: 6.2.7). Mitigation measures are outlined in Table 7.21, which would be implemented during construction and decommissioning to ensure that impacts from dust are reduced to levels that are not significant in EIA terms.</p> <p>As such, Volume 2, Chapter 7: Air Quality of the ES concludes that there would be no significant effects arising from the Proposed Development.</p> <p>A Dust Management Plan (DMP) will be prepared prior to construction, in accordance with the Outline DMP (Document Ref: 7.9) that forms part of the application for development consent. The Outline DMP comprises suitable measures based upon the Institute of Air Quality Management dust guidance (IAQM, 2024)</p>	
<p>Construction impacts</p>	<p>To add to this, we had to take the difficult decision recently to home-educate our son, so our home and garden and the surrounding woods and fields are now also our son's school effectively, and all the above impacts of noise, dust and visual changes from the Gammaton Road</p>	<p>The Applicant recognises the importance of assessing and avoiding, reducing or mitigating potential impacts on people living close to the Proposed Development.</p> <p>Construction works will be managed through the Onshore CEMP, developed in accordance with the Outline Onshore CEMP (Document Ref:</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
	<p>construction compound are deeply concerning when thinking about our son's education and wellbeing.</p>	<p>7.7). The Onshore CEMP will include measures to manage potential impacts associated with dust and noise.</p> <p>The Applicant will work closely with the residents to design and implement mitigation measures within the construction compound to minimise impacts on this property. This includes working with the residents to review:</p> <ul style="list-style-type: none"> the location and height of proposed hoarding or temporary bunds to minimise visual and noise impacts the siting of the temporary compound access to minimise road safety concerns with access to the compound temporary and permanent highway works on Gammaton Road to address road safety concerns siting of compound facilities such as the offices and welfare and the car park to minimise noise impacts associated with the daily operation of the compound. <p>The Applicant notes that reasons for the selection of the Gammaton Road construction compound included:</p> <ul style="list-style-type: none"> Requirement for a suitably sized site near the Converter Site to: <ul style="list-style-type: none"> minimise the need for storage, vehicle parking and worker facilities at the Converter Site, thereby minimising the overall size of the Converter Site. minimise the distance HGV and AILs need to travel between a main compound and the Converter Site. Connection to the onshore HVDC cable corridor to facilitate connection to the haul road, removing the need for HGVs and AILs to use local country lanes to access the Converter Site. The size of the site facilitates the establishment of appropriate mitigation measures on the boundary of the site to minimise potential noise and visual impacts associated with the temporary compound. Close proximity to a main road to minimise the distance travelled by HGV and AIL on narrow country lanes. Support of use by the landowner, mitigating the need to use CPO powers for the use of the land. 	

Topic	Summary of comments	Response	Design change (Y/N)
		<p>The Applicant considered other field areas on the eastern side of River Torridge, connected to the onshore HVDC cable corridor but notes that these areas would have still required access via Manteo Way, and would require HGV access down Tennacott Lane.</p>	
<p>Construction impacts</p>	<p>Knowing that the prevailing winds blow from the south-west it is likely that with hundreds of proposed vehicle movements each day on the haul road, considerable dust will be thrown into the air and blown the short distance to our home and garden. This raises anxieties around respiratory health risks and issues around spending time outdoors and drying washing, gardening etc. The visual impact from our kitchen, upstairs windows and garden overlooking the compound and haul road could also take their toll on our mental wellbeing and are causing current anticipatory anxiety as we imagine the future ahead.</p>	<p>The Applicant recognises the importance of assessing and avoiding, reducing or mitigating potential impacts on people living close to the Proposed Development. The Applicant will work closely with the residents to design and implement mitigation measures within the construction compound to minimise impacts on this property.</p> <p>This includes working with the residents to review:</p> <ul style="list-style-type: none"> the location and height of proposed hoarding or temporary bunds to minimise visual and noise impacts the siting of the temporary compound access to minimise road safety concerns with access to the compound temporary and permanent highway works on Gammaton Road to address road safety concerns siting of compound facilities such as the offices and welfare and the car park to minimise noise impacts associated with the daily operation of the compound. <p>The Applicant notes that reasons for the selection of the Gammaton Road construction compound included:</p> <ul style="list-style-type: none"> Requirement for a suitably sized site near the Converter Site Close proximity to a main road to minimise the distance travelled by HGV and AIL on narrow country lanes. Small number of residential properties located within close proximity to the proposed site. <p>The Applicant considered other field areas on the eastern side of River Torridge, connected to the onshore HVDC cable corridor but notes that these areas would have still required access via Manteo Way, and would require HGV access down Tennacott Lane.</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
		<p>Compounds in these areas would also be closer to a larger number of residential properties, particularly the new housing development proposed south off Hillcrest Road (accessed via Gammaton Road).</p> <p>The Applicant is not aware of other suitably sized sites that meet the requirements for the main construction compound and are located within close proximity.</p>	
Hydrology			
HDD	<p>While we welcome the use of technologies such as Horizontal Directional Drilling (HDD) to minimise impacts by avoiding open trenching of cables, there is a need to understand the impacts (including long-term impacts) of these approaches on for example hydrology and geomorphology - particularly where these are occurring near sensitive sites including freshwater and marine sites.</p>	<p>The use of Horizontal Directional Drilling (HDD) and related technologies are considered in Volume 2, Chapter 4: Geology, Hydrogeology and Ground Conditions of the ES (Document Ref: 6.2.4).</p> <p>With the limited potential sources of contamination identified and the measures adopted as part of the Proposed Development e.g. the use of HDD with avoidance of key constraints (geological SSSI and known areas of contamination), the impacts on the SSSI, and groundwater quality from existing contamination are predicted to be negligible and low respectively. The significance of effect is minor adverse (not significant in EIA terms) due to the combination of high and medium sensitivity receptors to the predicted impacts.</p>	N
Cable route	<p>The cable installation work will be highly visible from Robin Hill Farm Cottages. This will affect the holiday cottage business based there and undermine the value of the properties.</p>	<p>We will continue to engage with local accommodation providers, particularly around concerns of potential impacts impacting business. We are also interested in understanding the availability of accommodation for housing construction workers during the construction phase.</p> <p>The impact of the Proposed Development on the local economy and labour market is considered in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p> <p>In EIA terms, the effect on the tourism economy has been assessed as a minor adverse effect, primarily because it is expected that the transient workforce required to construct the Proposed Development will displace</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
		<p>tourist from accommodation and reduce spending in the wider tourism economy.</p> <p>The potential visual impacts during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p>	
<p>Loss of farmland</p>	<p>The project is too large and will industrialise the landscape. Too much farmland will be lost.</p>	<p>Through ongoing design development, the Applicant has sought to reduce the amount of land required for the Proposed Development.</p> <p>Details of the impact on agricultural land as a result of the Proposed Development are considered in Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8). As outlined in Section 8.10, the construction of the Proposed Development would be likely to temporarily affect areas of BMV land during the construction phase and this would lead to the temporary loss of more than 20ha of such land. The duration of this temporary impact, based on the maximum design scenario could be long term (i.e. >5 years).</p> <p>However, the implementation of mitigation measures as set out in Table 8.15 would ensure that soils and the quality of the agricultural land would be restored at the end of the construction period to reduce, as far as possible, any permanent effects on BMV land.</p> <p>The construction of the Converter Site would lead to the permanent loss of approximately 22.2ha of agricultural land. In addition, landscaping and earthworks could affect a further area of approximately 17.2ha and it is assessed, on a conservative basis that the quality of this land could be permanently affected.</p> <p>In addition, there would be very small losses of land around the link box access chamber locations. These would be placed at approximately 34 locations and in total would affect an area of less than 500m² or 0.05ha of land.</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
		<p>Mitigation measures to reduce the impact of the temporary and permanent loss of land are set out in Section 8.8 of Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8).</p>	
<p>Designated sites</p>	<p>Concern regarding impact on landscape (AONB), environment (UNESCO biosphere) and communities of North Devon who will be significantly impacted for many years.</p>	<p>The location of the Proposed Development in relation to Designated Spaces is set out in Section 1.7 and in Appendix 1.2 of Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1).</p> <p>The potential visual impacts on the North Devon Coast National Landscape (formally AONB) during the construction of the Proposed Development are assessed in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2).</p> <p>No fabric of the coastal landscape would be impacted, as the coastal area would be crossed using trenchless techniques, such as HDD. There would be a temporary impact on coastal views, as the construction works at the Landfall would, in part, take place from the barge located in the sea. The direct impact on coastal views would be of local geographic extent, short-term and temporary.</p> <p>There would be a temporary impact on seaward views, as the construction works at the Landfall would, in part, take place from the barge located in the sea. The direct impact on coastal views would be of local geographic extent, short-term and temporary.</p> <p>There would be a temporary impact of views from elevated land towards the landfall and Onshore HVDC Cable Corridor within the North Devon Coast NL. The direct impact on inland views would be of local geographic extent, short-term and temporary.</p> <p>There would be a temporary impact on tranquillity as the construction works at the Landfall take place from the barge located in the sea and the works at the landward side, at the transition joint bays and construction compounds would also be visible. The direct impact on tranquillity would be of local geographical extent, short-term and temporary.</p>	<p>N</p>

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Topic	Summary of comments	Response	Design change (Y/N)
Ongoing impact	XLinks will have an ongoing visual impact	<p>The visual impact of the Proposed Development during Construction, Operation and Decommissioning phases is assessed and considered in Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2). This chapter sets out a range of mitigation measures to lessen the landscape and visual impacts, including:</p> <p>The preparation of a detailed Landscape and Ecology Management Plan in general accordance with the Outline Landscape and Ecology Management Plan (Document Ref: 7.10), which will be submitted with the application for development consent.</p> <p>The Outline Landscape and Ecology Management will set out design commitments to avoid impacts on landscape character and visual receptors.</p> <p>The preparation of Design Principles Statement (Document Ref: 7.4), which will be submitted with the DCO application. The Design Principles Document will ensure the Converter Station adopts an architectural design that is sympathetic to the surrounding area and uses appropriate materials, colours and finishes.</p>	N
Land use and recreation			
Impact on PRow	The cable route looks like it may disrupt recreational (and commuter) access along the Tarka Trail. This needs to be avoided, as access to the trail helps to prevent East-the-Water being considered even more deprived than it currently is. That recreational use also contributes significantly to the income of local businesses (e.g. cycle hire, cafes, B&B) elsewhere along the route. Diverting cyclists around any closure would require significant use of a very busy section of A road, with limited opportunities to overtake.	The use of HDD would ensure that there would be no physical effects on the coastal recreational asset, the South West Coast Path, the Tarka Trail or National Cycle Route 3. In turn this means there will be no disruption to access to the Tarka Trail.	N
Impact on PRow	Environmental: It is unclear what disruption there might be to users of the coast path and other footpaths and rights of way which the cabling route impinges on.	The use of HDD would ensure that there would be no physical effects on the coastal recreational asset, the South West Coast Path, the Tarka Trail or National Cycle Route 3. In turn this means there will be no disruption to access to the coast path.	N

Topic	Summary of comments	Response	Design change (Y/N)
Noise and vibration			
Operational noise	Concerned about the noise of operations.	<p>An operational noise assessment has been carried out based on an updated layout of the Proposed Development. The assessment has found that with appropriate mitigation measures in place, operational noise levels will not exceed the existing background sound levels at nearby receptors.</p> <p>The assessment is carried out and reported in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6).</p> <p>Operational noise impacts are considered at Section 6.11 of the ES chapter.</p>	N
Traffic noise	Noise and vibration from traffic will have a significant impact on properties within 30 metres of Manteo Way.	<p>An assessment of noise and vibration generated during the construction phase of the Proposed Development has been carried out in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6). Further details can be found in Volume 2, Appendix 6.2: Construction Noise and Vibration, of the ES (Document Ref: 6.2.6.2).</p> <p>This assessment has found that noise and vibration associated with construction traffic are not expected to generate significant adverse effects. Typically, doubling the number of vehicles on a road increases the noise levels generated by road traffic by 3dB, which would generate an impact of only a low magnitude. However, it is not expected that construction traffic would generate a doubling of road traffic on the local road network.</p>	N
Construction noise	Robin Hill Farm is at the top of a valley which has associated acoustics. Obviously, dependant on the prevailing wind direction, noise can travel huge distances and be echoed and amplified. This obviously does not sit well with our promise to guests of 'rural tranquillity'	<p>An assessment of noise generated during the construction phase of the Proposed Development has been carried out. This assessment has found that noise and vibration associated with the construction phase are not expected to generate significant adverse effects.</p> <p>The assessment is carried out and reported in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6).</p> <p>Construction noise impacts are considered at Section 6.10 of the ES chapter.</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
<p>Construction noise</p>	<p>Construction noise and disruption from 7am to 7pm, for five years, will impact detrimentally on residents' health and wellbeing and the right to quiet enjoyment of their homes. I attended a consultation meeting and asked about noise and vibration. The staff present were not able to answer my questions. The data prepared to support this application has been a desktop task by people with no knowledge of the local area. They were not able to identify where, locally, noise readings had been taken or where the boundaries lay. This is especially concerning due to the devastating and long term impact this will have on those of us in the unfortunate position of living here. The noise impact map was a picture of red, orange and green areas, there were no defining markers to give it any context. When the staff eventually located a list of where noise recordings were made, they did not know which was the closest to the area to where the consultation was being held. Neither could they explain what the predicted level of noise would feel like. This should surely be a basic requirement if you are consulting with the general public.</p>	<p>An assessment of noise generated during the construction phase of the Proposed Development has been carried out. This assessment has found that noise and vibration associated with the construction phase are not expected to generate significant adverse effects save for nighttime working on the west side of the River Torridge if the need arose during HDD operations.</p> <p>The assessment is summarised reported in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6). Construction noise impacts are considered at Section 6.10.</p> <p>Staff from a range of technical disciplines attended every consultation event including members of the EIA team.</p> <p>Events were staffed to ensure the majority of questions could be responded to straight away, but it is not always possible to answer all questions where they are technical or complex.</p> <p>We maintained a follow-up log at all events to allow us to address these types of questions after the event.</p>	<p>N</p>
<p>Operational noise</p>	<p>The noise from the converter stations will be heard locally.</p>	<p>An operational noise assessment has been carried out based on an updated layout of the Proposed Development. The assessment has found that with appropriate mitigation measures in place, operational noise levels will not exceed the existing background sound levels at nearby receptors.</p> <p>The assessment is carried out and reported in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6).</p> <p>Operational noise impacts are considered at Section 6.11.</p>	<p>N</p>
<p>Construction noise</p>	<p>I understand that there will be 24/7 drilling works under the River Torridge plus lorries delivering the necessary equipment and materials for laying the cables and removing earthworks 24/7.</p> <p>This is a major concern considering the length of time the proposed works are scheduled to take and the environment we currently enjoy.</p>	<p>As outlined in the Statutory Nuisance Statement (Document Ref: 7.6), trenchless/HDD drilling or piling could be required outside of the assumed daytime construction hours (i.e. evening, Sundays, Bank Holidays or at night), which will be agreed upon with the relevant planning authority prior to these works, as set out in the outline onshore CEMP.</p> <p>If night-time operation is required, the closest residents to the works shall be notified of the start and completion of the works, as set out in the</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
		<p>outline onshore CEMP. The HDD plant would be installed and operated such that noise levels do not exceed a level of 45dB LAeq at the closest neighbouring noise-sensitive locations during night-time operation. Depending on the plant used, location, pit depth, etc., this may require the use of acoustic screening using temporary solid barriers with a height of at least that of the drilling equipment located in proximity (around 10m or less) of the trenchless drilling work.</p> <p>There are no proposals for 24/7 delivery of materials for the Proposed Development. The only exception is the transport of abnormal indivisible loads (AIL), which due to their size require delivery either in the middle of the night or early hours of the morning. There are a limited number of these deliveries associated with the transformers for the Converter Site and the HVDC cable deliveries, and prior warning can be issued when these are due to occur.</p> <p>The initial noise assessment has identified that high adverse noise impacts are expected at Littlecroft and Treetops, due to HDD works under the River Torridge.</p> <p>A further assessment of the HDD works will be carried out at the detailed design stage, where appropriate mitigation options, including locating the HDD works on the far-side of the river will be explored, such that any significant adverse effects can be sufficiently mitigated and avoided.</p>	
Construction noise	<p>My wife is particularly sensitive to noise, lights and smells, which is one of the main reasons we choose to live in a peaceful location. She regularly wears earplugs to mitigate household noise and when out and about. She is understandably anxious about the impact the Gammaton Road construction compound and haul road will have on herself and our family/home as a whole. I have taken the lead in liaising with your team as the project in general has become extremely triggering for my wife.</p>	<p>We empathise with the impacts felt by the nearest neighbours to the construction compound and converter station. Thorough communication with local residents and stakeholders will continue throughout construction, including via a community liaison officer. Arrangements for community liaison during construction are set out in outline in the Outline On-CEMP (Document Ref: 7.7)</p> <p>The Applicant recognises the importance of assessing and avoiding, reducing or mitigating potential impacts on people living close to the Proposed Development. The Applicant will work closely with the residents</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
		<p>to design and implement mitigation measures within the construction compound to minimise impacts on this property.</p> <p>This includes working with the residents to review:</p> <ul style="list-style-type: none"> • the location and height of proposed hoarding or temporary bunds to minimise visual and noise impacts • the siting of the temporary compound access to minimise road safety concerns with access to the compound • temporary and permanent highway works on Gammaton Road to address road safety concerns • siting of compound facilities such as the offices and welfare and the car park to minimise noise impacts associated with the daily operation of the compound. <p>An assessment of noise and vibration generated during the construction phase of the Proposed Development has been carried out in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6). Construction noise impacts related to the construction compounds and the construction of the converter station are considered at Section 6.10.</p> <p>Further details can be found in Volume 2, Appendix 6.2: Construction Noise and Vibration, of the ES (Document Ref:6.2.6.2).</p> <p>This assessment has found that noise and vibration associated with the Construction phase of the Proposed Development are not expected to generate significant adverse effects.</p>	
<p>Construction noise</p>	<p>The noise and disruption from construction will probably continue during operations. 'The 'Hum' is already here, it's bound to increase in volume'.</p>	<p>An operational noise assessment has been carried out based on an updated layout of the Proposed Development. The assessment has found that with appropriate mitigation measures in place, operational noise levels will not exceed the existing background sound levels at nearby receptors.</p> <p>The assessment is carried out and reported in Volume 2, Chapter 6: Noise and Vibration of the ES (Document Ref: 6.2.6). Construction Noise Impacts are considered at Section 6.10. Operational Noise Impacts are considered at Section 6.11</p>	<p>N</p>

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Topic	Summary of comments	Response	Design change (Y/N)
Other issues			
Mental health	Years of uncertainty and months of activity will harm our mental health and sensory overloads.	The effect of the Proposed Development on human health is assessed in Volume 4, Chapter 4: Human Health of the ES (Document Ref: 6.4.4). This chapter considers the effects as they relate to transport, open space, housing, employment and income, air quality, water quality, land quality, noise and vibration and health and social care services in Section 4.10.	N
Funding	XLinks is too expensive to be worth it – we would have to pay for the electricity we receive or have a subsidy. It is only for the 'benefit of your company.'	<p>Project funding, and a demonstration that funding will not be an impediment to delivery of the Proposed Development, is demonstrated in the Funding Statement submitted as part of the DCO application (Document Ref: 4.2). Delivery of the Proposed Development does not involve public or consumer funding.</p> <p>The Applicant anticipates that downward pressure on electricity prices will be exerted by the integration of the Proposed Development, and the wider Project, into the UK electricity supply. The Project has the capacity to power 7 million homes, meeting 8% of the UK's energy needs, helping reduce reliance on oil and gas imports and the price spikes we experience from those.</p>	N
Energy Security	It is wrong to rely on foreign countries for energy. Is Morocco stable? Why is the energy not being sold to Portugal, Spain, or France?	This Proposed Development can bring clean reliable power to the UK, on a dedicated supply, with the involvement of Morocco, a long-standing UK partner. Morocco has become, over the last 10 years, an international leader in renewable energy. Morocco's National Energy Strategy, which has a focus on the deployment of renewable generation, was launched in 2008. Morocco offers an attractive and stable investment climate. Multiple international power companies have invested successfully in the Moroccan energy market, including TAQA of the United Arab Emirates, ACWA Power of Saudi Arabia, TotalEnergies, Engie and EDF of France, and Siemens of Germany. And while we believe that we should maximise the UK's domestic renewables opportunity, it is a fact that a more diverse mix of reliable, affordable and green power is key to keeping the UK running in	N

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Topic	Summary of comments	Response	Design change (Y/N)
		<p>the coming years as our energy system, transport and homes become increasingly electrified, and demand for electricity continues to grow.</p> <p>The power generated as part of the Project would complement the energy we already generate from the sun and wind in the United Kingdom. When domestic renewable energy generation in the UK drops due to low winds and short periods of sun, the Project can provide access to the benefits of long hours of sun and consistent winds in Morocco to provide a firm but flexible source of zero-carbon electricity. The inclusion of a 22.5GWh/5GW battery facility in Morocco means this energy would be reliably available when it's most needed in Great Britain. The Morocco-UK Power Project will be an important contributor to a well-balanced grid.</p>	
Funding	What is your profit margin?	<p>This is commercial confidential information.</p> <p>Project funding, and a demonstration that funding will not be an impediment to delivery of the Proposed Development, is set out in the Funding Statement submitted as part of the DCO application (Document Ref: 4.2)</p>	N
Support	The few loud voices of those that oppose XLinks should not be permitted to 'drown out the smaller voices of the many' who will benefit in the long term from cheaper and cleaner electricity.	This is noted.	N
Fire risk	Fire risk from such a large development – residential properties nearby.	<p>There are no significant fire risks associated with the Proposed Development in either the construction, operation or decommissioning phases. Fire protection and suppression systems would be incorporated into the detailed design for the Converter Site. Construction phase mitigation measures for wildfires will be incorporated into the Onshore CEMP.</p>	N
Energy security	What is the long-term viability of being reliant on power from another country.	<p>This Proposed Development can bring clean reliable power to the UK, on a dedicated supply, with the involvement of Morocco, a long-standing UK partner. Morocco has become, over the last 10 years, an international leader in renewable energy. Morocco's National Energy Strategy, which has a focus on the deployment of renewable generation, was launched in</p>	N

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		<p>2008. Morocco offers an attractive and stable investment climate. Multiple international power companies have invested successfully in the Moroccan energy market, including TAQA of the United Arab Emirates, ACWA Power of Saudi Arabia, TotalEnergies, Engie and EDF of France, and Siemens of Germany. And while we believe that we should maximise the UK's domestic renewables opportunity, it is a fact that a more diverse mix of reliable, affordable and green power is key to keeping the UK running in the coming years as our energy system, transport and homes become increasingly electrified, and demand for electricity continues to grow.</p> <p>The power generated as part of the Project would complement the energy we already generate from the sun and wind in the United Kingdom. When domestic renewable energy generation in the UK drops due to low winds and short periods of sun, the Project can provide access to the benefits of long hours of sun and consistent winds in Morocco to provide a firm but flexible source of zero-carbon electricity. The inclusion of a 22.5GWh/5GW battery facility in Morocco means this energy would be reliably available when it's most needed in Great Britain. The Morocco-UK Power Project will be an important contributor to a well-balanced grid.</p>	
Site selection	Find a more suitable site.	<p>Alternatives to the Proposed Development are considered in the Project Development and Consideration of Options document annexed to the Planning Statement (Document Ref: 7.2) and Volume 1, Chapter 4: Need and Alternatives of the ES (Document Ref: 6.1.4). The location at which the Proposed Development would connect into the National Grid has been informed by an assessment undertaken by the National Grid Electricity System Operator (NGESO) which identified the Alverdiscott Substation Site as the most appropriate location for the Proposed Development to connect into the National Grid.</p> <p>The Applicant undertook supplementary assessments (included as appendices to Volume 1, Chapter 4: Need and Alternatives (Document 6.1.4) to the NGESO assessment to confirm the Alverdiscott Substation Site was the most appropriate option. The NGESO and Applicant's</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
		assessments all included South Wales connection points in their assessments	
Climate impacts	'The capture of significant quantities of solar energy in Morocco may create a microclimate near the capture plant (enough to produce cloud?). Shipping that energy to the UK, potentially to be released as heat, will have the climatic impacts of increasing the insolation of the UK. Sunlight that would have heated Morocco will now be heating the UK, increasing the heat budget of the country with potential for national climatic impact. This really needs to be thought about'.	Volume 4, Chapter 1: Climate Change of the ES (Document Ref: 6.4.1) sets out the assessment of effects in relation to climate change. Climate change in this context refers to the long-term shifts in temperatures and weather patterns that are fundamentally driven by human activities. Assessment as part of the Environmental Statement concludes that avoided GHG emissions resulting from the displacement of higher emitting electricity generation sources, are enabled by the Proposed Development. This would result in a significant beneficial effect in EIA terms.	N
Community impacts	The community at Alverdiscott will be most affected by the proposals to build the converter station at that site. The lives of a few will pay a huge cost. Our Community is already marginalised and is being further subjected to oppressive practice by those in power.	Construction works will be managed through the Onshore CEMP, developed in accordance with the Outline Onshore CEMP (Document Ref: 7.7). The Onshore CEMP will include measures to manage potential impacts across a range of environmental disciplines. Thorough communication with local residents and stakeholders will continue throughout construction. As outlined in the Outline Onshore CEMP (Document Ref: 7.7), a Community Liaison Group would be set up prior to construction and would continue through the construction phase of the Proposed Development as a formal forum for local issues to be raised. A Community Liaison Officer would be appointed to lead discussions with local communities, and also act as the primary point of contact should there be any queries or complaints. In addition, a Community Liaison Officer will be appointed to act as a dedicated point of contact for local stakeholders and would take a proactive approach to communications. We want the project to have a genuine and meaningful benefit for the local community, including contributing to local economic development. We sought local views on this as part of our recent statutory public consultation. We're grateful to everyone who shared their views, and we are carefully considering these as part of the consultation process.	N

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		<p>We are working with Torridge District Council and Devon County Council to develop a community benefit package that responds to local need and will share more information during examination. We will engage with the community as our plans mature to make sure that community voice has a role in refining our package to meet local needs. We will seek to create a lasting benefit for the community and will develop our plans to leverage where possible the good existing community work which is already underway.</p>	
<p>Energy security</p>	<p>The company need to provide assurances regarding energy security. This project is dependant on a foreign state and there needs to be assurances that the energy supply can be safely maintained in an unstable fragile world.</p>	<p>This Proposed Development can bring clean reliable power to the UK, on a dedicated supply, with the involvement of Morocco, a long-standing UK partner. Morocco has become, over the last 10 years, an international leader in renewable energy. Morocco's National Energy Strategy, which has a focus on the deployment of renewable generation, was launched in 2008. Morocco offers an attractive and stable investment climate. Multiple international power companies have invested successfully in the Moroccan energy market, including TAQA of the United Arab Emirates, ACWA Power of Saudi Arabia, TotalEnergies, Engie and EDF of France, and Siemens of Germany.</p> <p>And while we believe that we should maximise the UK's domestic renewables opportunity, a more diverse mix of reliable, affordable and green power is key to keeping the UK running in the coming years as our energy system, transport and homes become increasingly electrified, and demand for electricity continues to grow.</p> <p>The Proposed Development is needed so that the Project's international generation assets can enable an energy system that meets the Government's objectives to create a secure, reliable, and affordable energy supply for consumers to security of supply. Aggregated generation output from wind, solar, and storage is more predictable, less variable, and more flexible than output from a single generation technology, providing security and reliability of supply benefits for consumers. The power generated as part of the Project would complement the energy we already generate from the sun and wind in the United Kingdom. When domestic</p>	<p>N</p>

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		<p>renewable energy generation in the UK drops due to low winds and short periods of sun, the Project can provide access to the benefits of long hours of sun and consistent winds in Morocco to provide a firm but flexible source of zero-carbon electricity.</p> <p>The inclusion of a 22.5GWh/5GW battery facility in Morocco means this energy would be reliably available when it's most needed in Great Britain. The Morocco-UK Power Project will be an important contributor to a well-balanced grid. The Project offers an international solution to bringing forwards decarbonisation, energy security, and affordability benefits also ascribed to nationally significant infrastructure. Those Project benefits will not be delivered unless the Proposed Development is delivered. Therefore, the Proposed Development is needed.</p>	
Funding	<p>The funding by UAE is questionable. There needs to be assurances and scrutiny regarding the human rights particularly those of women in these states.</p>	<p>Project funding, and a demonstration that funding will not be an impediment to delivery, is set out in the Funding Statement submitted as part of the DCO application (Document Ref: 4.2). The Applicant works to the Equator Principles in all jurisdictions. These serve as a common baseline and risk management framework for financial institutions to identify, assess and manage environmental and social risks when financing projects and means that the Applicant works to the highest standards across all parts of the Project.</p>	N
Energy security	<p>'We have a large fear of bringing in electricity from another country, especially a North African Country and it crossing Spain, Portugal & France. Where is the security here? Surely the money could be better spent on projects in this country.'</p>	<p>This Proposed Development can bring clean reliable power to the UK, on a dedicated supply, with the involvement of Morocco, a long-standing UK partner. Morocco has become, over the last 10 years, an international leader in renewable energy. Morocco's National Energy Strategy, which has a focus on the deployment of renewable generation, was launched in 2008. Morocco offers an attractive and stable investment climate. Multiple international power companies have invested successfully in the Moroccan energy market, including TAQA of the United Arab Emirates, ACWA Power of Saudi Arabia, TotalEnergies, Engie and EDF of France, and Siemens of Germany. And while we believe that we should maximise the UK's domestic renewables opportunity, it is a fact that a more diverse mix of</p>	N

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		<p>reliable, affordable and green power is key to keeping the UK running in the coming years as our energy system, transport and homes become increasingly electrified, and demand for electricity continues to grow.</p> <p>The Proposed Development is needed so that the Project's international generation assets can enable an energy system that meets the Government's objectives to create a secure, reliable, and affordable energy supply for consumers to security of supply. Aggregated generation output from wind, solar, and storage is more predictable, less variable, and more flexible than output from a single generation technology, providing security and reliability of supply benefits for consumers. The power generated as part of the Project would complement the energy we already generate from the sun and wind in the United Kingdom.</p> <p>When domestic renewable energy generation in the UK drops due to low winds and short periods of sun, the Project can provide access to the benefits of long hours of sun and consistent winds in Morocco to provide a firm but flexible source of zero-carbon electricity. The inclusion of a 22.5GWh/5GW battery facility in Morocco means this energy would be reliably available when it's most needed in Great Britain. The Morocco-UK Power Project will be an important contributor to a well-balanced grid.</p> <p>The Project offers an international solution to bringing forwards the decarbonisation, energy security, and affordability benefits also ascribed to nationally significant infrastructure.</p>	
Support	Explicit support for the proposals	This is noted.	N
Socioeconomics and tourism			
Economic impact	<p>The XLinks proposal would generate a large number of new jobs in Morocco. XLinks quotes 10,000 jobs during manufacture and construction and 2000 ongoing jobs after construction in Morocco. XLinks is unable to make any statement regarding employment in the UK as the project will create little or no employment opportunity in the UK.</p>	<p>The impact of the Proposed Development on the local economy and labour market is considered in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p> <p>The main economic impacts will occur when the Proposed Development is under construction rather than during operation. During this period it was estimated that the peak annual impacts would be:</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
		<p>£7.2 million GVA and 70 jobs in the Local Area; £18.5 million GVA and 190 jobs in Devon; and £279.8 million GVA and 2,050 jobs across the UK.</p>	
Economic impact	<p>On a local level Bideford area residents, particularly those served with section 44 notices, are already suffering planning blight and substantial personal loss due to drop in property value, and are trapped in their homes with no ability to sell properties at their true value which may be a necessity due to major life events. Many local people are reliant on holidaymakers who come to the area due to its UNESCO Biosphere² and AONB³ status. It is unlikely that tourists will flock to view the destruction of the local environment or wish to stay in a holiday let with the equivalent of Hinckley B output buzzing through the next field so the local rural economy will take a hit in order to increase foreign profits.</p>	<p>The Applicant has been in contact with a number of landowners who have raised concerns about impacts of the proposed project on their property. This is an ongoing process, and the Applicant is reviewing these on a case-by-case basis. We will continue to engage with landowners to understand and look to resolve any concerns they have prior to and during the construction of the project to minimise potential impacts on their ability to sell properties.</p> <p>In Environmental Impact Assessment terms, the effect on the tourism economy has been assessed as a minor adverse effect because it is expected that the transient workforce required to construct the Proposed Development will displace tourist from accommodation and reduce spending in the wider tourism economy. This impact is expected to be temporary and concentrated in the summer months, when demand for visitor accommodation is highest. The evidence indicates that occupancy of tourism accommodation varies significantly in different seasons with notable capacity outside of the peak summer months.</p> <p>The Applicant has prepared an Accommodation Strategy which seeks to minimise such impacts on tourism accommodation and maximise the retention of workers' spend on accommodation within the local economy. This includes by optimising the use of spare rooms, the effect of which is to minimise the proportion of workers in tourism accommodation to a level of less than 1% of available supply.</p>	N
Economic impact	<p>The scheme will provide jobs. However, there is a shortage of skilled labour here and there are likely to be knock-on effects on the wider construction industry locally if labour is creamed off on to this project. If small businesses are disadvantaged, this will not benefit our economy in the long run. What sort of training could be offered to locally recruited</p>	<p>The impact of the Proposed Development on the labour market is considered in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3). Assumptions around the workforce have been made and are considered as part of the assessment of the economic activity receptor within the construction phase (Section 3.10), the</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
	<p>staff to enable them to apply those skills in the Torrridge economy once the construction phase is over?</p>	<p>operational phase (Section 3.11) and the decommissioning phase (Section 3.12).</p> <p>An Outline Skills and Employment Strategy has been provided with the DCO application (Document Ref: 7.23). Skills and Employment Plans will be developed in accordance with the Outline Skills and Employment Strategy prior to and during the construction phase, setting how the Applicant and its Contractors will engage with the local community to provide opportunities for skills development and employment, particularly during the construction phase of the project.</p>	
<p>Housing market</p>	<p>There is a shortage of rented housing in Torrridge. Where will temporary workers stay, and will they occupy holiday accommodation to the detriment of the tourist economy during the tourist season?</p>	<p>The impact of the Proposed Development on the local economy and labour market is considered in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p> <p>In Environmental Impact Assessment terms, the effect on the tourism economy has been assessed as a minor adverse effect in EIA terms, primary because it is expected that the transient workforce required to construct the Proposed Development will displace tourist from accommodation and reduce spending in the wider tourism economy.</p> <p>However, the Outline Accommodation Strategy (Document Ref: 7.13) indicates that the majority of the out of area construction workforce can be accommodated through other means than tourist accommodation and that, if required, the use of tourist accommodation would account for between 0.5-1.0% of available supply within Torrridge and North Devon.</p> <p>As such, the tourism related impacts assessed in the Environmental Assessment are substantially reduced since the PEIR assessment. For instance, rather than the figure of £2.8 million for displaced spend as referenced in the PEIR, a revised, equivalent figure of £0.7 million – 75% lower – is outlined and discussed in Section 3.10 of Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p> <p>This interacts with the Outline Skills and Employment Strategy to optimise the local recruitment of construction workers.</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
Economic impact	Ongoing construction work will be a disincentive to holidaymakers wishing to visit the area. Some small businesses could be seriously affected for several years running. Because of the interconnected nature of the tourist economy, it is likely to be quite difficult to ascertain full extent of the economic impact, but there are clearly risks involved.	<p>The impact of the Proposed Development on the local economy and labour market is considered in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p> <p>In Environmental Impact Assessment terms, the effect on the tourism economy has been assessed as a minor adverse effect, primarily because it is expected that the transient workforce required to construct the Proposed Development will displace tourist from accommodation and reduce spending in the wider tourism economy.</p> <p>However, the Outline Accommodation Strategy (Document Ref: 7.13) indicates that the majority of the out of area construction workforce can be accommodated through other means than tourist accommodation and that, if required, the use of tourist accommodation would account for between 0.5-1.0% of available supply within Torridge and North Devon.</p> <p>As such, the tourism related impacts assessed in the Environmental Assessment are substantially reduced since the PEIR assessment. For instance, rather than the figure of £2.8 million for displaced spend as referenced in the PEIR, a revised, equivalent figure of £0.7 million – 75% lower – is outlined and discussed in Section 3.10 of Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p>	N
Impact on agriculture	There will certainly be disruption to agriculture which, given the long cycles involved in farming, could be quite considerable. I am sure farmers will describe this in more detail. Because farms underpin rural communities and local economies, the knock-on effects could be quite considerable.	<p>The impact of the Proposed Development on agriculture is considered in Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8).</p> <p>The results of soil and ALC survey work undertaken to date have informed the Outline Soil Management Plan (Document Ref: 7.7.4) submitted as part of the DCO application, which includes the commitment to undertaking further detailed soil survey of the land within the area of the Proposed Development to confirm the distribution of soil types to be affected during construction.</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
Economic impact	Concern about the effect of operations on tourism.	<p>The impact of the Proposed Development on the local economy and labour market is considered in Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p> <p>In Environmental Impact Assessment terms, the effect on the tourism economy has been assessed as a minor adverse effect, primarily because it is expected that the transient workforce required to construct the Proposed Development could displace tourist from accommodation and reduce spending in the wider tourism economy.</p> <p>However, the Outline Accommodation Strategy (Document Ref: 7.13) indicates that the majority of the out of area construction workforce can be accommodated through other means than tourist accommodation and that, if required, the use of tourist accommodation would account for between 0.5-1.0% of available supply within Torridge and North Devon.</p> <p>As such, the tourism related impacts assessed in the Environmental Assessment are substantially reduced since the PEIR assessment. For instance, rather than the figure of £2.8 million for displaced spend as referenced in the PEIR, a revised, equivalent figure of £0.7 million – 75% lower – is outlined and discussed in Section 3.10 of Volume 4, Chapter 3: Socio-economics and Tourism of the ES (Document Ref: 6.4.3).</p>	N
Local area impacts	'Impact on wildlife, tourism, shipping and visual impact. This is an area dependent on tourism.'	<p>The referenced issues are considered in the following documents:</p> <ul style="list-style-type: none"> • Volume 2, Chapter 1: Onshore Ecology and Nature Conservation of the ES (Document Ref: 6.2.1) considers impacts on wildlife. • Volume 2, Chapter 8: Land Use and Recreation of the ES (Document Ref: 6.2.8) considers recreation, • Volume 3, Chapter 5: Shipping & Navigation of the ES (Document Ref: 6.3.5) considers shipping. • Volume 4, Chapter 2: Landscape, Seascape and Visual Resources of the ES (Document Ref: 6.4.2) considers visual amenity. 	
Transport and access			

Topic	Summary of comments	Response	Design change (Y/N)
<p>Traffic disruption</p>	<p>Traffic interruption on lanes should be kept to a minimum, including size of lorries and frequency of movements.</p>	<p>The relevant potential traffic and transport impacts during the construction phase of the Proposed Development are also considered in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5), Section 5.10, while mitigation measures are set out in Section 5.8.</p> <p>Construction traffic will be managed through a Construction Traffic Management Plan (CTMP), developed in accordance with the Outline CTMP (Document Ref: 7.12).</p> <p>The purpose of the haul road within the Onshore HVDC Cable Corridor is to provide an offline traffic route that avoids the need for construction vehicles to use country lanes.</p>	<p>N</p>
<p>Temporary road</p>	<p>My other worry is the temporary road, adjacent to Gammaton Road, which will be used by several hundred vehicles a day for five or six years. What will the impact be on nearby properties? What will the road be surfaced with? Will there be a lot of dust? The noise from the road will carry a long way, will there be any acoustic screening?</p>	<p>The relevant potential traffic and transport impacts during the construction phase of the Proposed Development are also considered in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5), Section 5.10, while mitigation measures are set out in Section 5.8.</p> <p>Construction traffic will be managed through a Construction Traffic Management Plan (CTMP), developed in accordance with the Outline CTMP (Document Ref: 7.12).</p> <p>The section of Gammaton Road between Manteo Way and the access to TCC5 would experience a significant increase in HGV flows as a result of the Proposed Development in the context of very low baseline HGV flows. The widening of Gammaton Road between Manteo Way and the access to TCC5 would enable full two-way movement of vehicles and would enable HGVs to safely manoeuvre.</p> <p>The haul road surface is yet to be confirmed as it will be designed by the Construction Contractor. It would be surfaced appropriately to minimise dust generation. It will also have a low-speed limit to help to minimise dust generation. A temporary acoustic screen is not currently proposed based on the construction noise modelling; however, noise generation will be monitored during construction and any concerns from local residents can be raised through the Community Liaison Officer for resolution.</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
		<p>A noise impact assessment has been carried out to establish the likely effects generated by construction led traffic on proposed haul roads, including the haul road between the Gammaton Road compound and the Converter Station works. The assessment has assumed 72 HGV movements per day on this haul road, aligning with the maximum predicted in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5). However, no acoustic screening of the haul road has been included. Based on these assumptions, the predicted construction noise impact from the use of haul road assessment is low impact, resulting in a minor adverse effect which is not significant in EIA terms.</p> <p>The impact of the Proposed Development on dust and air pollution is set out in Volume 2 Chapter 7: Air Quality of the ES (Document Ref: 6.2.7). Overall, no significant effects have been identified in terms of dust and air pollution, arising from the Proposed Development.</p> <p>An Outline Dust Management Plan (DMP) has prepared to support the Outline Onshore CEMP (Document Ref: 7.7). This will be updated for approval by Torridge District Council as part of the final Onshore CEMP. The final Onshore CEMP would also include measures to manage construction noise.</p>	
<p>Cumulative impact</p>	<p>Devon's roads are already busy with quarry trucks and HGV's. XLinks will further impact this.</p>	<p>The relevant potential traffic and transport impacts during the construction phase of the Proposed Development are also considered in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5), Section 5.10, while mitigation measures are set out in Section 5.8.</p> <p>Construction traffic will be managed through a Construction Traffic Management Plan (CTMP), developed in accordance with the Outline CTMP (Document Ref: 7.12).</p> <p>The purpose of the haul road within the Onshore HVDC Cable Corridor is to provide an offline traffic route that avoids the need for construction vehicles, and HGVs in particular, to use country lanes.</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
		<p>Overall, it is concluded that there will be no significant effects arising from the Proposed Development during the construction, operation and maintenance or decommissioning phases in terms of traffic and transport.</p>	
<p>HGV management</p>	<p>Manage traffic effectively, including the timing of HGVs.</p>	<p>Construction traffic will be managed through a Construction Traffic Management Plan (CTMP), developed in accordance with the Outline CTMP (Document Ref: 7.12). The CTMP will be approved by Devon County Council prior to the commencement of construction.</p> <p>The movement of construction vehicles would be controlled by the CTMP to ensure they travel in a safe and efficient manner. Haul roads are being constructed along the Onshore HVDC cable corridor to remove construction traffic, particularly HGV from country lanes.</p> <p>HGV movements will be managed, particularly during peak traffic periods and during peak periods in the construction period to minimise impacts on existing journey times. HGV movements will be managed through the CTMP.</p> <p>All construction HGVs will be routeing under strict traffic management control via the CTMP and warning signage will be used where relevant, for example at accesses to construction compounds, to alert other drivers of the construction traffic.</p>	<p>N</p>
<p>Traffic impacts</p>	<p>Traffic will negatively impact the Bideford East ward for up to six years due to increased journeys on Manteo Way – PEIR says 80 HGV movements a day and 532 additional vehicles, and a 38% increase in HGVs on the A39. Do these estimates include the traffic from new housing developments likely to be built nearby, the Bideford Business Park, and the council's Operational Services Depot?</p>	<p>The relevant potential traffic and transport impacts during the construction phase of the Proposed Development are also considered in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5), Section 5.10, while mitigation measures are set out in Section 5.8.</p> <p>Other developments which emerge at the same time as the construction period of the Proposed Development are treated together and are cumulatively assessed against the baseline scenario to determine their cumulative impact and their cumulative highway and transport mitigation requirements.</p> <p>The cumulative environmental assessment set out in Section 5.11 of Volume 2, Chapter 5: Traffic and Transport (Document Ref: 6.2.5)</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
		<p>considers the cumulative effect of new developments expected to be built out over the construction period, including part of the proposed Bideford Business Park development and the Operational Services Centre.</p>	
Road damage	<p>Manteo Way and other roads will be damaged, e.g. potholes, by the increased traffic. The traffic will also lead to increased dust and pollution in one ward, Bideford East ward.</p>	<p>The relevant potential traffic and transport impacts during the construction phase of the Proposed Development are also considered in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5), Section 5.10, while mitigation measures are set out in Section 5.8.</p> <p>An Outline Dust Management Plan (DMP) has prepared to support the Outline Onshore CEMP (Document Ref: 7.7). This will be updated for approval by Torridge District Council as part of the final Onshore CEMP. The final Onshore CEMP would also include measures to manage construction noise.</p> <p>Any damage to the highway that has been demonstrably caused by construction traffic associated with the Proposed Development will be repaired by the Construction Contractor. The Applicant is discussing with Devon County Council (DCC) the provision of a contribution to road maintenance for a period after construction to support maintenance activities on the road network used during the construction phase. This will be agreed under a Section 106 agreement directly with DCC.</p>	N
HGV management	<p>Concerned about HGVs on very small roads.</p>	<p>Construction traffic will be managed through a Construction Traffic Management Plan (CTMP), developed in accordance with the Outline CTMP (Document Ref: 7.12).</p> <p>The movement of construction vehicles would be controlled by the CTMP to ensure they travel in a safe and efficient manner. Haul roads are being constructed along the Onshore HVDC cable corridor to remove construction traffic, particularly HGV from country lanes.</p>	N
Construction impacts	<p>I also note that the current plan does require some development of the site prior to the dedicated road being in place. The Alverdiscott 'back road' to Bideford has seen an increase in heavy traffic e.g. quarry trucks and even 38-ton vehicles down this Devon lane. As the XLinks project</p>	<p>The Gammaton Road compound would require establishment prior to the construction of the haul road to the Converter Site. No HGV traffic is proposed to be permitted to the Converter Site until the haul road is constructed.</p>	N

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Topic	Summary of comments	Response	Design change (Y/N)
	requires initial work to the site prior to the dedicated road being installed then this will increase that burden which is already a dangerous road for locals both drivers and pedestrians (there is no footpath to walk).	<p>Construction traffic would be managed through a Construction Traffic Management Plan (CTMP), developed in accordance with the Outline CTMP (Document Ref: 7.12).</p> <p>The movement of construction vehicles would be controlled by the CTMP to ensure they travel in a safe and efficient manner. Haul roads are being constructed along the Onshore HVDC cable corridor to remove construction traffic, particularly HGV from country lanes.</p>	
Temporary roads	You are creating an access road /haul track around Bideford from the coast to the Torridge and beyond, which will be removed once the cable installation is complete. Rather than removal and reinstatement, this would seem to provide an opportunity to provide a new link between the SW Coast Path and the Tarka Trail, with a new trail using some of your infrastructure combined with existing footpaths and tracks. This would involve detailed consultation and agreement with landowners along the route (and again not all may agree), but would be part of your strategy to 'sell' the project to the community.	The Applicant has previously raised the potential for a new pedestrian/cycle route along the Onshore HVDC Cable Corridor and has received feedback from landowners that they would not support this. The Applicant is required to return the land to current landowners to continue their agricultural operation and does not have rights to compulsorily acquire land within the cable corridor to create a link and as such, is unable to take this forward.	N
Hedgerows	Will the farmers who have hedges which border Robin Hill Farm surrounding the fields where the work is being carried out, still have access to the fields in order to cut the hedges? A hedge must be cut each season or it becomes too thick to cut.	<p>During construction, landowners will still have access to their land. Communication with landowners will be maintained throughout this period through a Community Liaison Officer.</p> <p>Access would need to be co-ordinated with construction personnel to ensure safe access for farmers is provided and maintained during farm management activities such as hedge cutting. These types of activities would be managed through the Community Liaison Officer.</p>	N
HGV management	XLinks say there will be 500 vehicle movements a day, including 105 HGVs – the lanes around the converter site are already under great pressure from other projects – recent road accident relating to the nearby solar farm. How do you propose to manage this huge amount of traffic safely?	<p>Construction traffic will be managed through a Construction Traffic Management Plan (CTMP), developed in accordance with the Outline CTMP (Document Ref: 7.12).</p> <p>The movement of construction vehicles would be controlled by the CTMP to ensure they travel in a safe and efficient manner. Haul roads are being constructed along the Onshore HVDC cable corridor to remove construction traffic, particularly HGV from country lanes.</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
		<p>The majority of daily construction phase movements will be associated with staff movement which will occur outside of peak periods on the road network (i.e. before 07:00 and after 19:00).</p> <p>The relevant potential traffic and transport impacts during the construction phase of the Proposed Development are also considered in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5), Section 5.10, while mitigation measures are set out in Section 5.8.</p>	
CTMP	Road signage should be properly installed and individual drivers should be given instructions and penalties if the instructions are not followed.	Construction traffic will be managed through a Construction Traffic Management Plan (CTMP), developed in accordance with the Outline CTMP (Document Ref: 7.12). This will include requirements for road signage. The Applicant will be working closely with its Construction Contractors to monitor compliance with designated traffic routes and address instances where instructions are not followed.	N
Traffic disruption	Increased plant traffic will significantly affect the daily lives of residents. Road usage is already high, especially in the holiday season. These construction schemes always overrun so the official projections are probably far from realistic.	<p>Construction traffic will be managed through a Construction Traffic Management Plan (CTMP), developed in accordance with the Outline CTMP (Document Ref: 7.12).</p> <p>The movement of construction vehicles would be controlled by the CTMP to ensure they travel in a safe and efficient manner. Haul roads are being constructed along the Onshore HVDC cable corridor to remove construction traffic, particularly HGV from country lanes.</p> <p>Peak traffic movement periods have been based on an indicative construction programme for the purposes of the assessment. These traffic movements will be reviewed and confirmed by the Construction Contractor with updated information provided in the CTMP which will be approved by Devon County Council prior to the commencement of construction works.</p>	N
Construction traffic	'The scale of noise and construction traffic is unacceptable and dangerous with over 500 vehicle movements a day, most of which will no doubt be heavy goods vehicles. Lots of locals use the road for car journeys. Horse riders, cyclists, farmers, people exercising, all use the lane. There will be conflict with lorries and it has not been shown that	<p>Construction traffic will be managed through a Construction Traffic Management Plan (CTMP), developed in accordance with the Outline CTMP (Document Ref: 7.12).</p> <p>The movement of construction vehicles would be controlled by the CTMP to ensure they travel in a safe and efficient manner. Haul roads are being</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
	<p>this will be mitigated. There will be an unacceptable impact on highway safety, the impact on the road network is severe and the proposed development will result in conflict between residential and other commercial traffic which would be harmful to highway safety. Developers, despite saying they will only operate between certain hours, rarely do so. We have already experienced this with the solar development which consistently operated outside the stated times. Neither did the traffic use the stated routes.'</p>	<p>constructed along the Onshore HVDC cable corridor to remove construction traffic, particularly HGV from country lanes.</p> <p>The majority of daily construction phase movements will be associated with staff movement which will occur outside of peak periods on the road network.</p> <p>The relevant potential traffic and transport impacts during the construction phase of the Proposed Development are also considered in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5), Section 5.10, while mitigation measures are set out in Section 5.8.</p> <p>Impacts on non-motorised user fear and intimidation are assessed in Section 5.10 of the ES chapter. In all assessed cases, the overall impact from construction is expected to be negligible.</p> <p>Impact on road safety is also assessed in Section 5.10 of the ES chapter. No significant effects in EIA terms are predicted as a result of the Proposed Development.</p>	
<p>Road damage</p>	<p>The roads are inadequate for a proposal of this size – the additional vehicles will further degrade the roads. DCC will not repair the roads – will XLinks?</p>	<p>Construction traffic will be managed through a Construction Traffic Management Plan (CTMP), developed in accordance with the Outline CTMP (Document Ref: 7.12).</p> <p>The movement of construction vehicles would be controlled by the CTMP to ensure they travel in a safe and efficient manner. Haul roads are being constructed along the Onshore HVDC cable corridor to remove construction traffic, particularly HGVs from country lanes.</p> <p>Any damage to the highway that has been demonstrably caused by construction traffic associated with the Proposed Development will be repaired by the Construction Contractor. The Applicant is discussing with Devon County Council (DCC) the provision of a contribution to road maintenance for a period after construction to support maintenance activities on the road network used during the construction phase. This will be agreed under a Section 106 agreement directly with DCC.</p>	<p>N</p>

Topic	Summary of comments	Response	Design change (Y/N)
Construction impacts	<p>'The disturbance that vehicle movements through Bideford east alone will cause is unjustified, and the local residents will continue to suffer through the long process of 72 months that this project will take'.</p>	<p>Construction traffic will be managed through a Construction Traffic Management Plan (CTMP), developed in accordance with the Outline CTMP (Document Ref: 7.12).</p> <p>The movement of construction vehicles would be controlled by the CTMP to ensure they travel in a safe and efficient manner. Haul roads are being constructed along the Onshore HVDC cable corridor to remove construction traffic, particularly HGV from country lanes.</p> <p>The majority of daily construction phase movements will be associated with staff movement which will occur outside of peak periods on the road network.</p> <p>The relevant potential traffic and transport impacts during the construction phase of the Proposed Development are also considered in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5), Section 5.10, while mitigation measures are set out in Section 5.8.</p>	N
Cumulative impacts	<p>Planning approved housing projects will significantly increase journeys on the A39 and Manteo Way. Road surfaces and junctions are struggling with this already, i.e. visibility, issues, potholes, queuing at junctions. 'Sections of the route at Mount Pleasant may have structural issues that will be exacerbated by extra lorries (possibility of collapse?). The site is relatively windy, so any proposal to reduce its visual impact by tree planting on the top of banks should take account of the fact that they might prove difficult to establish (as has proved to be the case where we live)'.</p>	<p>Construction traffic will be managed through a Construction Traffic Management Plan (CTMP), developed in accordance with the Outline CTMP (Document Ref: 7.12). The Outline CTMP sets out that a pre-entry condition survey will be undertaken before the start of works and after the substantial completion of works on minor highway links and new junctions used by HGVs to access the Onshore Infrastructure Area.</p> <p>The movement of construction vehicles would be controlled by the CTMP to ensure they travel in a safe and efficient manner. Haul roads are being constructed along the Onshore HVDC cable corridor to remove construction traffic, particularly HGV from country lanes.</p> <p>An assessment is also made in Section 5.11 of Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5) of the cumulative effects on the highways network of the Proposed Development in conjunction with other proposed and consented developments in the local area. Overall, there are not anticipated to be any significant effects arising from the Proposed Developments alongside other projects/plans.</p>	N

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Topic	Summary of comments	Response	Design change (Y/N)
		Any damage to the highway that has been demonstrably caused by construction traffic associated with the Proposed Development will be repaired by the Construction Contractor. The Applicant is discussing with Devon County Council (DCC) the provision of a contribution to road maintenance for a period after construction to support maintenance activities on the road network used during the construction phase. This will be agreed under a Section 106 agreement directly with DCC.	
Road suitability	'The A386, near Bloody Corner is already effectively reduced to single track with passing places, so might not be entirely suitable for significant use by larger vehicles. Any improvements to roadside drainage should consider the likelihood of increased flood risk downhill.'	The junction at the A386 and the unnamed road leading to Littleham where the proposed HDD crossing compound is located for the River Torridge crossing would be upgraded as part of the Proposed Development to improve the safety of this junction for both road users and construction traffic. The detailed design for this junction upgrade would be developed in consultation with Devon County Council who will approve the design. The detailed design will include requirements for operational drainage at this location.	N
Parking	'Service access should have designated parking areas, and not rely on parking in existing areas, especially passing places'.	The Applicant has made provision for appropriate parking facilities for workers and construction vehicles within the temporary construction compounds at Gammaton Road and Abbotsham Cross. Temporary parking would be provided at working areas within the Onshore HVDC Cable Corridor. Construction worker parking will not be permitted on local roads or country lanes.	N
Safety impacts	The A386 at this point is de-restricted, it is on a bend in the road with poor visibility for traffic coming from Torrington towards Bideford. There is pedestrian traffic and there has already been several serious accidents including one fatality. Serious consideration would need to be given on the layout of any junction here and a reduction of the speed limit. In fact there has already been a petition sent to Devon Highways asking for a reduction of the speed limit on this stretch of the A386 which has two laybys used for sports access to the River Torridge and also a pathway alongside the road used by walkers, runners and dog walkers. I understand no entrance is being considered on the single	The junction at the A386 and the unnamed road leading to Littleham where the proposed HDD crossing compound is located for the River Torridge crossing would be upgraded as part of the Proposed Development to improve the safety of this junction for both road users and construction traffic. The detailed design for this junction upgrade would be developed in consultation with Devon County Council who will approve the design. The detailed design will include requirements for operational drainage at this location.	N

Topic	Summary of comments	Response	Design change (Y/N)
	<p>track Littleham Road. No information has yet been provided as to exactly what is planned with regards to the entrance/exit points to the site. Existing farm traffic already has to use the oncoming lane when turning right from the Littleham road on to the A386.</p>		
Access tracks	<p>there is no information available on the proposed entry to the field where the pumping station will be located and where it is to be located. My concern is that unless extensive works are carried out there will be some very safety conditions created on an already dangerous stretch of the A386</p>	<p>Highway works are proposed at the entrance to the Cornborough Sewage Treatment Works to provide safe access for HGV and Abnormal Indivisible Load (AIL) traffic movements. The detailed design for this junction upgrade would be developed in consultation with Devon County Council who will approve the design.</p> <p>The junction at the A386 and the unnamed road leading to Littleham where the proposed HDD crossing compound is located for the River Torridge crossing would be upgraded as part of the Proposed Development to improve the safety of this junction for both road users and construction traffic. The detailed design for this junction upgrade would be developed in consultation with Devon County Council who will approve the design. The detailed design will include requirements for operational drainage at this location.</p>	N
Driver delay	<p>At peak times, weekdays 4.30 to 5.30, there is often a queue down Manteo Way, from our house downhill to the junction with the B3233.</p>	<p>This is noted.</p> <p>The impact of the Proposed Development on driver delay at the Barnstaple Road/Manteo Way junction is assessed in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5), Section 5.10.</p> <p>While there would be some increase in the delay to drivers turning right onto Barnstaple Street from Manteo Way with the addition of construction traffic, this would be unlikely to be noticeable given the ratio of flow to capacity (RFC) of the junction and queueing without construction traffic.</p> <p>HGV traffic movements will be managed through the CTMP to avoid or minimise traffic movement during peak periods of the day where reasonably practicable.</p> <p>We note that construction worker movements will be undertaken prior to 07:00 and after 19:00.</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
Road condition	<p>There will inevitably be disruption due to heavy and light vehicle movements and I understand that the project has been designed to keep this to a minimum. However, Torridge residents are already angry about the condition of our roads. Potholes are not being repaired quickly or robustly enough and some lanes are becoming impassable. Additional traffic from construction, and also during the operational phase, will increase wear and tear on the roads and we should be compensated for this.</p>	<p>Construction traffic will be managed through a Construction Traffic Management Plan (CTMP), developed in accordance with the Outline CTMP (Document Ref: 7.12).</p> <p>The movement of construction vehicles would be controlled by the CTMP to ensure they travel in a safe and efficient manner. Haul roads are being constructed along the Onshore HVDC cable corridor to remove construction traffic, particularly HGV from country lanes.</p> <p>The majority of daily construction phase movements will be associated with staff movement which will occur outside of peak periods on the road network.</p> <p>The relevant potential traffic and transport impacts during the construction phase of the Proposed Development are also considered in Volume 2, Chapter 5: Traffic and Transport of the ES (Document Ref: 6.2.5), Section 5.10, while mitigation measures are set out in Section 5.8.</p> <p>Any damage to the highway that has been demonstrably caused by construction traffic associated with the Proposed Development will be repaired by the Construction Contractor. The Applicant is discussing with Devon County Council (DCC) the provision of a contribution to road maintenance for a period after construction to support maintenance activities on the road network used during the construction phase. This will be agreed under a Section 106 agreement directly with DCC.</p>	N
PRoW	<p>The XLinks proposal opens up an opportunity to complete a long-term ambition to create a multi-use cycle and walking trail along the path of the former railway line between Bideford and Westward Ho! (see enclosed map). The proposed onshore route for the cable from Cornborough Cliff partially coincides with the route for this trail which features in the Local Plan for Torridge and North Devon and in Devon County Council's Transport Infrastructure Plan of March 2020, with delivery scheduled for 2024-2030.</p> <p>The scheme would provide a safe and easy cycle and walking route between Bideford and the coast and would be a superb amenity for</p>	<p>The Applicant has previously raised the potential for a new pedestrian/cycle route along the Onshore HVDC Cable Corridor and has received feedback from landowners that they would not support this. The Applicant is required to return the land to current landowners to continue their agricultural operation and does not have rights to compulsorily acquire land within the cable corridor to create a link and as such, is unable to take this forward as part of the Proposed Development.</p> <p>The Applicant is exploring how we can best contribute to social and economic local development, at a level appropriate with the scale of the</p>	N

Topic	Summary of comments	Response	Design change (Y/N)
	<p>both residents and holidaymakers. It would be good for the tourist economy, attracting visitors to Westward Ho! into Bideford town centre, and good for the environment and public health in encouraging people to cycle or walk. Devon County Council identified it as a high priority project in the Local Cycling and Walking Infrastructure plan, approved in January 2024, though it is unlikely to happen without an injection of funding. There is some Section 106 funding available from developers which risks being lost unless the project can be expedited.</p> <p>Some preliminary mapping has already taken place and land/permissions obtained along some stretches of the route. The stretch from Abbotsham Road past the sewage works, crossing Cornborough Road and joining the coast path at Cornborough Cliff, (marked Phase 2 on the map) is that which roughly coincides with the XLinks cable route. It has so far proved difficult to achieve an agreement with the landowner for the final section between Cornborough Road and Cornborough Cliff. XLinks will now have to negotiate with this landowner to agree the least intrusive route for laying the cable. It is understood that they will not be able/want to include a permanent right of way within these negotiations.</p> <p>However, there other ways in which they could support the completion of this scheme. Firstly, by providing finance for a project with clear public benefit (the trail could even be named the XLinks trail as a lasting reminder). Secondly, by working with Torridge District Council and Devon County Council to identify the best route for the trail – either using existing footpaths and rights of way, or along the route negotiated with the landowner. This is likely to be along the field edge and will have been taken out of commission for several years.</p>	<p>Proposed Development in Devon through the establishment of a community benefit fund.</p> <p>The Applicant is continuing work to develop a community benefit package that responds to local need and will share more information during examination. We note however that any pedestrian or cycling routes will need to be developed by Council in agreement with local landowners.</p>	
Road widening	<p>We feel that the proposed Gammaton road widening for future potential replacement of generators needs to be carefully considered. It was heartening to hear the Xlinks team discussing this matter at the 1st of June consultation and we support the idea that selective minimal widening should be observed wherever possible so that ancient</p>	<p>The proposed widening of Gammaton Road would only be undertaken at pinch points to facilitate operational access in the event that an Abnormal Indivisible Load (AIL) is required to bring a replacement transformer to site. We are aware of local resident concerns about wholesale widening of this road and that is not our intent. We have had to include the full extent of the</p>	N

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Topic	Summary of comments	Response	Design change (Y/N)
	<p>hedgerow is not unnecessarily damaged and so that the road does not change character to the point where it becomes used more frequently by local traffic.</p>	<p>road within our proposed works as the detailed design of the widening has not been completed.</p> <p>Detailed design would be completed in consultation with Devon County Council who would be responsible for approving the highways works design. Provision has been made for the establishment of hedgerows along the southern boundary of the road to maintain the existing character of the road. We would seek to minimise the extent of hedgerow removal associated with the highway works.</p>	

APPENDIX J-5: REGARD HAD TO STATUTORY CONSULTATION RESPONSES FROM CONSULTEES UNDER SECTION 48

As set out in 7.1.2 of the Consultation Report (Document Ref: 5.1), the Applicant solicited responses from consultees under s48 of the PA 2008.

None of the respondents to the consultation identified themselves as responding specifically under s48 of the PA 2008 and therefore responses under s48 are considered to have been covered in the above sections.

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