

XLINKS' MOROCCO-UK POWER PROJECT

Consultation Report

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For Issue

XLINKS' MOROCCO-UK POWER PROJECT

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Glossary

Term	Meaning
APFP Regulations	The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (having regard to the changes made in The Infrastructure Planning (Miscellaneous Provisions) Regulations 2024)
EIA Regulations 2017	Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations 2017)
MP Regulations	The Infrastructure Planning (Miscellaneous Provisions) Regulations 2024
Planning Act 2008	The Planning Act 2008
The Applicant	Xlinks 1 Ltd
The Project	The Morocco-UK Power Project
The Proposed Development	The parts of the Morocco-UK Power Project located within the UK
The Section 35 direction	The Secretary of State for Energy Security and Net Zero's direction under Section 35 of the Planning Act 2008 that the Proposed Development should be considered as Nationally Significant

Acronyms

Acronym	Meaning
AC	Alternating Current
AIL	Abnormal indivisible load
ALC	Agricultural land classification
BEIS	Department for Business, Energy and Industrial Strategy
BNG	Biodiversity net gain
CEA	Cumulative Effects Assessment
CEMP	Construction Environmental Management Plan
CTMP	Construction Traffic Management Plan
DC	Direct Current
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
EEZ	Exclusive Economic Zone
EIA	Environmental Impact Assessment
ES	Environmental Statement
GHG	Greenhouse gas
HDD	Horizontal Directional Drilling
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
LEMP	Landscape and Ecology Management Plan

Acronym	Meaning
LNR	Local Nature Reserve
On-CEMP	Onshore Construction Environmental Management Plan
PA 2008	Planning Act 2008
PEIR	Preliminary Environmental Information Report
PINS	The Planning Inspectorate
PRoW	Public Right of Way
SoCC	Statement of Community Consultation
SSSI	Site of Special Scientific Interest
STEM	Science, technology, engineering and mathematics
TRO	Traffic Regulation Order
TTRO	Temporary Traffic Regulation Order
UKCP	UK Climate Protections

Units

Units	Meaning
GW	Gigawatt
kV	Kilovolt
KM	Kilometre
M	Miles
MW	Megawatt
NM	Nautical mile

1 EXECUTIVE SUMMARY

- 1.1.1 This Consultation Report relates to the elements of the Morocco-UK Power Project (the 'Project') which are located within the UK (the 'Proposed Development'). The Proposed Development has been recognised by the Secretary of State for Energy Security and Net Zero as Nationally Significant under Section 35 of the Planning Act 2008 (PA 2008) and therefore requires a Development Consent Order (DCO).
- 1.1.2 This Consultation Report has been prepared in fulfilment of Section 37(3)(c) of the PA 2008. This requires the DCO application to be accompanied by a consultation report giving details of the matters specified in Section 37(7).
- 1.1.3 It explains how the Applicant has complied with the consultation requirements set out in the PA 2008 (as well as the Infrastructure Planning ('Applications: Prescribed Forms and Procedure') Regulations 2009 ('APFP Regulations'), Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regulations 2017') and The Infrastructure Planning (Miscellaneous Provisions) Regulations 2024). Its primary function is to provide evidence to the Planning Inspectorate about the Applicant's compliance with the requirements of the pre-application procedure.
- 1.1.4 The Applicant has conducted extensive pre-application consultation and engagement in preparing its DCO application. This included early engagement with stakeholders and the community to introduce the Proposed Development, two periods of non-statutory public consultation prior to the Secretary of State's direction that the Proposed Development should be considered Nationally Significant, a period of statutory consultation intended to meet the requirements set by PA 2008, and targeted non-statutory consultation in relation to changes made to the Proposed Development prior to the submission of a DCO application.
- 1.1.5 Chapter 2 of this report sets out the purpose of the document, summarises the context for the consultation and provides an overview of the different stages of consultation which the Applicant carried out.
- 1.1.6 Chapter 3 summarises non-statutory consultation carried out by the Applicant in relation to the Proposed Development. This includes early engagement (set out in section 3.2), public consultation prior to the recognition of the Proposed Development as Nationally Significant (set out in sections 3.3-3.4), engagement carried out by the Applicant following recognition of the Proposed Development as Nationally Significant and prior to statutory consultation (set out in sections 3.5 and 3.6), and compliance with advice under Section 51 of PA 2008 (set out in section 3.7). It should be read alongside **Appendices A-1 to A-3** (Document Ref: 5.2).
- 1.1.7 Chapter 4 confirms that the Proposed Development is EIA development as defined by the EIA Regulations 2017 and that the Applicant sought a scoping opinion from the Secretary of State as a result. It should be read alongside **Appendix B-1** (Document Ref: 5.2).
- 1.1.8 Chapter 5 sets out the process through which the Applicant developed its Statement of Community Consultation (SoCC). This includes the identification of local authorities under s43(1) of the PA 2008 (section 5.2), how the Applicant developed the SoCC including through early engagement with the local authorities under s43(1) of the PA 2008 (section 5.3), the contents of the draft SoCC (section

5.4), how the Applicant consulted on the draft SoCC (section 5.5), details of local authority responses to the draft SoCC (section 5.6), the regard had by the Applicant to the responses (section 5.7), and details of the publication of the SoCC (section 5.8). It should be read alongside **Appendices C-1 to D-1** (Document Ref: 5.2).

- 1.1.9 Chapter 6 reports on consultation carried out by the Applicant in fulfilment of statutory requirements over the period from 16 May 2024 to 11 July 2024. This includes an overview of the statutory consultation (section 6.1), consultation under s42 of PA 2008 (section 6.2), the notification of the Planning Inspectorate (PINS) under s46 of PA 2008 (section 6.3), consultation with the local community in accordance with the SoCC as prescribed by s47(7) of PA 2008 (section 6.4), and publicity under s48 of PA 2008 (section 6.5). It should be read alongside **Appendices D-2 – I-1** (Document Ref: 5.2).
- 1.1.10 Chapter 7 sets out responses to the statutory consultation and summarises the regard had to them by the Applicant. This includes responses from consultees under s42(1)(a) and (b) of PA 2008 (section 7.2), s42(1)(d) of PA 2008 (section 7.3) and s47 of PA 2008 (7.4). As none of the consultees who responded identified themselves as specifically responding to the s48 notice and given those required to receive the s48 notice are the same consultees as prescribed by s42(1)(a) and (b), those consultees are dealt with together in section 7.2. This chapter should be read alongside **Appendices J-1 to J-5** (Document Ref: 5.2).
- 1.1.11 Chapter 8 details engagement conducted by the Applicant following the statutory consultation and prior to the submission of the DCO application. This includes engagement with stakeholders following statutory consultation (section 8.2) as well as targeted statutory consultation held between 6 September 2024 and 7 October 2024 in relation to proposed changes to the Order limits (section 8.3). It should be read alongside **Appendices K-1 to K-2** (Document Ref: 5.2).
- 1.1.12 Chapter 9 concludes by providing an overview of how the Proposed Development's design has evolved in response to consultation feedback (section 9.1) and finally confirming the Applicant's compliance with requirements and guidance for consultation (section 9.2). It should be read alongside **Appendices M-1 to M-2** (Document Ref: 5.2).
- 1.1.13 The Applicant considers that it has complied with MHCLG guidance on the pre-application process (MHCLG, 2024) and Nationally Significant Infrastructure Projects: Advice on the Consultation Report (The Planning Inspectorate, 2024). Detailed information on compliance with this guidance is included in **Appendices M-1 and M-2** (Document Ref: 5.2).
- 1.1.14 The Applicant considers that it has met the statutory requirements of the pre-application process. As set out in section 2.4, the Applicant has undertaken a programme of non-statutory and statutory consultation.
- 1.1.15 As well as preparing this report, the Applicant has set out how it has complied with guidance and advice on consultation in the s55 checklist (Document Ref: 1.4) that is also part of the DCO application documents.

2 INTRODUCTION

2.1 Purpose of this document

- 2.1.1 This Consultation Report relates to the Proposed Development. In seeking the legal powers to construct and operate the Proposed Development, Xlinks 1 Ltd (the 'Applicant') is making an application for a Development Consent Order (DCO) to the Secretary of State. Section 37(3)(c) of the Planning Act 2008 (PA 2008) requires the DCO application to be accompanied by a consultation report giving details of the matters specified in Section 37(7).
- 2.1.2 Section 37(7) defines the Consultation Report as a document giving details of:
- what has been done at the pre-application stage in compliance with section 42 (duty to consult prescribed consultees, local authorities and persons who fall within one or more of the categories listed in section 44), section 47 (duty to consult the local community), section 48 (duty to publicise) in relation to a proposed application that has become the application;
 - any relevant responses, as defined in section 49 of PA 2008; and,
 - the account taken of any relevant responses.
- 2.1.3 This Consultation Report has been prepared in accordance with these requirements.
- 2.1.4 The Secretary of State for Energy Security and Net Zero has directed under Section 35 of PA 2008 (the 'Section 35 direction') that the Proposed Development should be considered Nationally Significant and therefore requires a DCO.
- 2.1.5 Before the Section 35 direction, the Applicant had been preparing to submit a planning application to Torridge District Council for the onshore elements of the Proposed Development and a marine license application to the Marine Management Organisation for the offshore elements of the Proposed Development. The Applicant conducted consultation in support of these potential applications which informed the development of the Proposed Development up to the point of the Section 35 direction.
- 2.1.6 This Consultation Report's primary function is to provide evidence to the Planning Inspectorate about the Applicant's compliance with the requirements of the pre-application procedure. Non-statutory consultation which took place prior to the Section 35 direction is also included in this report to the extent that it informed the Proposed Development.
- 2.1.7 As stated in MHCLG's Planning Act 2008: Guidance on the pre-application stage for Nationally Significant Infrastructure Projects (MHCLG, 2024), the Consultation Report should:
- *"Provide a general description of the consultation process undertaken including the timeline;*
 - *set out specifically what the applicant has done to comply with the statutory requirements of the Planning Act, including advice issued under section 51 of the Planning Act, relevant secondary legislation and this guidance;*
 - *set out how the applicant has complied with the requirements to consult local communities described in the SoCC;*

- *set out any relevant responses to consultation (but not a complete list of responses);*
- *provide a description of how the proposed application for submission has been informed and influenced by taking account of those responses, showing any significant changes made as a result;*
- *provide an explanation as to why any responses advising on changes to a proposed project, including advice from statutory consultees and local authorities on effects, were not followed; and*
- *be expressed in terms sufficient to enable the Planning Inspectorate to understand fully how consultation has been undertaken, and how the issues raised through consultation have been addressed or responded to.”*

2.2 Consultation context

- 2.2.1 The Applicant first publicised the Project as a whole in September 2021, prior to the Section 35 direction in September 2023. It also conducted significant non-statutory consultation and engagement locally on the Proposed Development between September 2021 and September 2023 in support of the planning application that the Applicant had expected to submit to Torridge District Council.
- 2.2.2 This informed the Proposed Development's design, up to the point of the Section 35 direction. It also means that the Applicant had undertaken significant work prior to the commencement of statutory consultation to inform stakeholders and the local community about the Proposed Development.
- 2.2.3 Given this, information on consultation and engagement carried out by the Applicant prior to the Section 35 direction is included in this report because it informed both the Proposed Development and the Applicant's approach to statutory consultation.
- 2.2.4 Outside of the UK, the Project is also located in Morocco and passes through the territorial waters of Portugal, Spain and France. The Applicant has complied with legal requirements for consultation in each of these jurisdictions. This activity is not described within this report as it is outside of the scope of the Proposed Development.
- 2.2.5 All onshore elements of the Proposed Development are located entirely within the local authority area of Devon County Council.
- 2.2.6 At a lower-tier local authority level, the majority of the Proposed Development onshore, including the converter station site and all of the onshore cable corridor, is located within the local authority area of Torridge District Council.
- 2.2.7 A small part of the Order limits, included where there may be oversail by construction vehicles using the B3233, is located in the local authority area of North Devon Council. As these are highways works, Devon County Council would normally be the relevant planning authority rather than North Devon Council.
- 2.2.8 The parts of the Proposed Development which are onshore are located in the parishes of Abbotsham, Alwington, Alverdiscott and Huntshaw, Bideford, Westleigh, Northam and Littleham and Landcross. Outside of the town of Bideford, these are rural communities.
- 2.2.9 The Applicant identified seldom heard audiences onshore as including those without internet access, young people aged between 11 and 19, older people

aged over 65, Gypsies and Travellers, the time poor, the economically challenged, ethnic minorities, and LGBT+ people.

- 2.2.10 The Proposed Development also includes an offshore cable corridor to the extent of the UK's Exclusive Economic Zone (EEZ). The Applicant considered audiences likely to have an interest in the offshore elements of the Proposed Development, including environmental stakeholders, fisheries, commercial marine users, other developers of offshore infrastructure, and leisure marine users.

2.3 Design development and consultation

- 2.3.1 The Applicant has conducted an ongoing programme of consultation and engagement to inform the design of the Proposed Development. This has included consultation and engagement which took place prior to the Section 35 direction, and which informed the evolution of the Proposed Development up to that point.
- 2.3.2 The Applicant engaged with the Department for Business, Energy and Industrial Strategy (now the Department for Energy Security and Net Zero), National Grid, local authorities and landowners as it prepared its initial plans for the Proposed Development. Further information is presented in section 3.2.
- 2.3.3 This early engagement informed the preferred option for connecting the Project into the national grid at Alverdiscott National Grid Substation and the originally proposed location for the converter station site, as well as the onshore and offshore cable corridors.
- 2.3.4 The Applicant conducted an initial non-statutory public consultation from 23 November 2022 to 12 December 2022. The focus of this consultation was the local community in the vicinity of the elements of the Proposed Development onshore, to inform a planning application that the Applicant expected to submit at that time to Torridge District Council for the onshore elements of the Proposed Development. Further information is presented in section 3.3.
- 2.3.5 The 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 consultation 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.
- 2.3.6 The Applicant presented updated proposals as part of a further period of non-statutory consultation from 24 April 2023 and 31 May 2023. The focus of this consultation was also the local community in the vicinity of the elements of the Proposed Development onshore. Further information is presented in section 3.4.
- 2.3.7 The consultation sought feedback on the Applicant's updated proposals prior to the expected submission of a planning application to Torridge District Council for the onshore elements of the Proposed Development. Key changes made to the design as a result of consultation at this stage included rotating the eastern converter station building south and west to reduce potential visual impacts.
- 2.3.8 Following the Section 35 direction, the Applicant conducted a statutory consultation to fulfil the requirements of sections 42, 47, 48,49 and 50 of the PA 2008 (as well as the requirements of the APFP Regulations and EIA Regulations). This took place from 16 May 2024 to 11 July 2024. Further information is presented in Chapter 6.

- 2.3.9 The consultation sought feedback on the Proposed Development; the potential short and long-term impacts of the Proposed Development during construction, operations, and decommissioning; the contribution the Proposed Development could make to the local community; and the Preliminary Environmental Information Report (PEIR). Key changes made to the design as a result of consultation at this stage included changes to the Order limits to accommodate construction vehicle movements including abnormal indivisible loads (AILs) and utility diversions. **Appendices J-1 to J-5** (Document Ref: 5.2) set out the regard had to consultation feedback in full.
- 2.3.10 The Applicant conducted a further round of targeted consultation prior to the submission of the DCO application between 6 September 2024 and 7 October 2024. This consulted persons with an interest in land affected by minor changes made to the Order limits in response to statutory consultation feedback. Further information is presented in Chapter 8.

2.4 Summary of consultation activities

- 2.4.1 **Table 2-1** provides a summary of consultation activities, including consultation and engagement prior to the Section 35 direction, statutory consultation and further targeted statutory consultation.

Table 2-1: Summary of consultation activities

Consultation activity undertaken:	Date:	Chapter of the Consultation Report:
Consultation and engagement prior to the Section 35 direction		
Early engagement with the Department for Business, Energy and Industrial Strategy, National Grid, local authorities and landowners (section 3.2)	June 2020 – November 2022	Chapter 3
Initial non-statutory public consultation (section 3.3)	23 November 2022 – 12 December 2022	
Second non-statutory public consultation (section 3.4)	24 April 2023 - 31 May 2023	
Engagement with local authorities and the community regarding the Section 35 direction (section 3.5)	August – September 2023	
Consultation and engagement prior to statutory consultation, including development of SoCC		
Ongoing engagement with local authorities and statutory consultees prior to the statutory consultation (section 3.6)	September 2023 – May 2024	Chapter 3
EIA scoping (chapter 4)	30 January 2024 – 7 March 2024	Chapter 4
Consultation of host local authorities on the draft SoCC (section 5.5)	25 March 2024 – 22 April 2024	Chapter 5

Notice of availability of the SoCC in accordance with section 47 of PA 2008 (section 5.8)	8-9 May 2024	
Statutory consultation		
Proposed application publicised in accordance with section 48 of PA 2008 (section 6.5)	16 May 2024 – 13 June 2024	Chapter 6
Notification of the Inspectorate of the proposed application in accordance with section 46 of PA 2008 (section 6.3)	15 May 2024	
SoCC made available in the vicinity of the Proposed Development as prescribed by section 47(6) of PA 2008 (section 5.8)	16 May 2024 – 11 July 2024	Chapter 5
Consultation as prescribed under section 42 of PA 2008 (section 6.2)	16 May 2024 – 11 July 2024	Chapter 6
Consultation in accordance with the SoCC as prescribed by section 47(7) of PA 2007 (section 6.4)	16 May 2024 – 11 July 2024	
Further consultation and engagement following statutory consultation and prior to the submission of the DCO application		
Targeted consultation on minor changes to the Order limits (section 8.2)	6 September 2024 – 7 October 2024	Chapter 8

2.5 Covering list and completed section 55 checklist

- 2.5.1 A covering letter (Document Ref: 1.1) and completed s55 checklist is submitted within the application documents (Document Ref: 1.4).
- 2.5.2 The completed s55 checklist provides evidence of compliance with the pre-application consultation requirements within the PA 2008, APFP Regulations, EIA Regulations 2017, and the MHCLG pre-application guidance (MHCLG, 2024).

3 NON-STATUTORY CONSULTATION AND ENGAGEMENT

3.1 Overview

- 3.1.1 The Applicant conducted consultation and engagement outside of the statutory consultation period. This included two periods of non-statutory consultation in relation to a potential planning application to Torridge District Council prior to the Section 35 direction, as well as ongoing engagement with local authorities and other stakeholders outside of periods of formal consultation.
- 3.1.2 Before the Section 35 direction, the Applicant had expected to submit a planning application to Torridge District Council for the onshore elements of the Proposed Development and a marine licence application to the Marine Management Organisation. Non-statutory consultation and engagement which took place prior to the Section 35 direction is set out in this chapter to the extent to which it informed the Proposed Development.
- 3.1.3 This chapter sets out the consultation and engagement activity conducted by the Applicant outside of the period of statutory consultation.

3.2 Early engagement

- 3.2.1 Prior to its first non-statutory consultation, the Applicant engaged with the Department for Business, Energy and Industrial Strategy, National Grid, local authorities and landowners as it prepared its initial plans for the Proposed Development.
- 3.2.2 This early engagement helped inform the location that the Proposed Development would connect into the national grid, as well as the Applicant's understanding of potential locations for the converter station site and the onshore cable route.
- 3.2.3 Early engagement regarding the siting of the converter station site and onshore cable route took place across two broad phases. Initially, the Applicant made contact with identified owners of potentially suitable sites for the converter station in June 2020. This was followed by contact with identified owners of potentially suitable land for installing onshore cables.
- 3.2.4 As the Applicant did not at this stage know whether the Proposed Development would connect into the national grid at Alverdiscott National Grid Substation or at an alternative location in Pembrokeshire, it contacted the owners of potential sites in both locations.
- 3.2.5 Following this initial contact, the Applicant continued to engage with potential landowners in the remainder of 2020 and across 2021. The Applicant also began in 2021 to make contact with the authorities that it expected at that time would need to provide consent for a marine licence application and a planning application – the Marine Management Organisation and Torridge District Council.
- 3.2.6 Details of this engagement are set out in **Table 3-1**.

Table 3-1: Early engagement

Date	Consultee:	Summary of engagement:
Through April 2019	Department for Business, Energy and Industrial Strategy	Engagement regarding Contracts for Difference
Through 2020	National Grid	Engagement regarding connection agreements
June – August 2020	Potential landowners	Initial contact with 22 individuals in Devon and Pembrokeshire around potentially siting the converter station or onshore cabling on their land.
April – September 2021	National Grid	Engagement regarding Connection and Infrastructure Options Note process
20 October 2021	Torrige District Council	Introduction to the Project as the local planning authority for a potential planning application.
28 October 2021	Marine Management Organisation	Introduction to Project and discussion of marine licensing requirements.
May - August 2022	Devon County Council	Initial contact with Devon County Council's Historic Environment Team regarding study areas and archaeological geophysical surveys
25 November 2022	Marine Management Organisation	Pre-application meeting regarding marine licensing.
Through December 2022	National Grid	Engagement regarding grid connection agreement

3.3 Initial public consultation (November 2022)

3.3.1 The Applicant conducted an initial period of public consultation between 23 November 2022 and 12 December 2022.

3.3.2 At this time, the Applicant expected to submit a planning application to Torrige District Council for the onshore elements of the Proposed Development. The focus of consultation at this stage was to secure feedback from the community in the vicinity of the onshore elements of the Proposed Development on the location of the converter station site and options for onshore cable routes.

3.3.3 The Applicant publicised this consultation by:

- Sending a letter to 914 addresses in the vicinity of the converter station site proposed at that time;
- Sending a letter to parish councils in the same area;

- Sending a press release to the North Devon Gazette and North Devon Journal; and,
- Launching a website and Facebook page.

3.3.4 The Applicant made information available as part of the consultation by:

- Inviting members and officers at Torrridge District Council to a briefing at Caddsdwn Industrial Park, Clovelly Rd, Bideford EX39 3BE on 14 November 2022;
- Holding public information days at the following dates, times and locations:
 - 12.30pm – 8.30pm on 23 November 2022 at Huntshaw Parish Hall, Huntshaw, Torrington EX38 7HH;
 - 12.30pm – 8.30pm on 24 November 2022 at Caddsdwn Industrial Park, Clovelly Rd, Bideford EX39 3BE;
- Publishing the information boards used at the public information days on its website.

3.3.5 Copies of consultation publicity materials, online materials and the information boards from the public information days are included in **Appendix A-1** (Document Ref: 5.2).

3.3.6 The Applicant accepted responses to the consultation through hard copy consultation questionnaires at the public information days, by email and by Freepost.

3.3.7 The Applicant received 36 responses to this stage of consultation. **Table 3-2** provides an overview of issues raised at this stage of consultation and summarises the regard had to them.

3.3.8 Key changes made in response to consultation feedback included:

- Moving the converter station site from its original proposed location north of Gammaton Cross to its currently proposed location at the Old Webbery Showground; and,
- Amending the proposed cable corridor to avoid new homes and a school in Abbotsham.

Table 3-2: Feedback received during the initial public consultation from 23 November 2022 to 12 December 2022

Topic:	Frequency:	Regard had by Applicant:
Alternatives and need	26	
Support for principle of Proposed Development	19	This is noted.
Concern about security of supply energy delivered from abroad	6	A lot of power is already imported into the UK, including 20% of electricity demand in in Q2 2024. The recent development of new interconnectors between the UK allows for the import and export of electricity as a complement to domestic generation capacity.

The development of new interconnector infrastructure is recognised as having an important role to play as the UK transitions to Net Zero. As set out in the Planning Statement (Document Ref: 7.2) submitted as part of the DCO application, the National Policy Statement for Electricity Networks Infrastructure (EN-5) (DESNZ, 2024) 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.

Project should connect into East Yelland substation

- 1 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 stations and a lower risk of

interactions with nearby infrastructure. Further information is presented in Volume 1, Chapter 4 of the Environmental Statement (ES) (Document Ref: 6.1.4).

Converter station location	11
Opposition to proposed converter station site at Gammaton Cross	6 In response to feedback received during consultation, the Applicant moved the proposed converter station site to the Old Webbery Showground.
Request for converter station to be located closer to the point of connection	2 In response to feedback received during consultation, the Applicant moved the proposed converter station site to the Old Webbery Showground.
Concern about impact from converter station at Gammaton Cross on wildlife	2 In response to feedback received during consultation, the Applicant moved the proposed converter station site to the Old Webbery Showground.
Concern about construction impacts from converter station at Gammaton Cross	1 In response to feedback received during consultation, the Applicant moved the proposed converter station site to the Old Webbery Showground.
Construction	11
Concern about disruption during construction	5 The Applicant presented further information regarding construction techniques as part of the second stage of non-statutory consultation set out in section 3.4 and then in the statutory consultation set out in Chapter 6. As part of the DCO application, the Applicant has 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)

Concern about potential closure of the A39 during construction	2 (Document Ref: 7.12). These include measures to avoid, reduce or mitigate disruption during construction. 2 There would be a need to close the A39 bridge over the River Torridge on a temporary basis for AILs carrying transformers. As part of the DCO application, the Applicant has produced several outline documents and strategies, including an Outline On-CEMP (Document Ref: 7.7) and an Outline CTMP (Document Ref: 7.12). These include measures for the management of 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.
Concern about impact from construction on holiday traffic	2 The impact of construction on driver delay is assessed in Volume 2 Chapter 5 of the ES (Document Ref: 6.2.5). The assessment considers change at peak times when the baseline traffic flow is highest. Following mitigation included in an Outline On-CEMP (Document Ref: 7.7) and an Outline CTMP (Document Ref: 7.12) the Applicant does not expect any significant effects on driver delay. Further information is set out in Volume 2 Chapter 5 of the ES (Document Ref: 6.2.5).
Concern about use of rural roads for construction vehicles	2 The Proposed Development includes a haul road to the converter station site to reduce volumes of vehicles on rural roads. An Outline CTMP (Document Ref: 7.12) has been submitted as part of the DCO application and a CTMP will be adopted which will set

out suitable construction vehicle routes to be adhered to. These include requiring all contractors to comply with the agreed routeing plans and will ensure that all drivers are informed of the need to restrict Heavy Goods Vehicle (HGV) movements to those specified routes. If complaints are received that vehicles are not following prescribed routes, the Principal Contractor(s) will be responsible for the implementation of measures to record vehicle routeing, for example by applying spot-checks to ensure that the agreed routes are being adhered to. This will help ensure that construction vehicles do not use roads which have been identified as unsuitable.

EIA	9
Concern about noise impacts	2 Noise during construction and operations is assessed in Volume 2 Chapter 6 of the ES (Document Ref: 6.2.6). Following the application of mitigation measures set out in the Outline On-CEMP (Document Ref: 7.7) and embedded mitigation measures such as acoustic enclosures, attenuators and silencers, and acoustic barriers at the converter station site, no significant effects from noise are expected.
Further detail requested regarding potential noise impacts	1 The Applicant presented further information about noise as part of the materials it published as part of its statutory consultation, included in Appendix G-2 (Document Ref: 5.2) of this report, and as part of Volume

<p>Concern about potential flooding</p>	<p>2 Chapter 6 of the ES (Document Reference: 6.2.6).</p> <p>1 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). As part of this chapter, a number of designated sites relating to hydrology and flood risk were identified within the study area including ecologically designated Taw-Torr ridge Estuary (SSSI), Nitrate Vulnerable Zones (Jennetts reservoir, Gammaton lower reservoir and Taw-Torr ridge estuary). The assessment has not identified any significant effects arising from the Proposed Development during the construction, operation and maintenance or decommissioning phases.</p>
<p>Concern about impacts on marine environment</p>	<p>1 The Applicant has assessed potential impacts on the marine environment in Volume 3 of the ES (Document Ref: 6.3). After mitigation, no significant effects are anticipated for benthic ecology, fish and shellfish, marine mammals and turtle, shipping and navigation, other marine users, physical processes or offshore ornithology. Volume 3, Chapter 3 of the ES (Document Ref: 6.3.3) identifies impacts on commercial fisheries not exceeding minor significance and therefore additional mitigation is not considered necessary. The exception to this is the impact of temporary loss of</p>

fishing grounds and associated displacement during the construction phase for the UK potting fleet, for which a potential moderate adverse impact significance was identified. It is recognised that in some instances the removal or relocation of static gear may be required during the construction phase. Where this is the case, appropriate mitigation will be implemented for affected vessels following an evidence-based approach via the establishment of co-operation agreements, which will reduce the significance of the effect to minor adverse, which is considered to be not significant. Volume 3, Chapter 7 of the ES (Document Ref: 6.3.7) identifies no significant impacts on known marine archaeology, but notes that the exception to this is potentially significant adverse impacts from disturbance of currently unknown features, which cannot ever be fully discounted (the nature of discovery may be impactful). Any such disturbance is considered unlikely to occur following the extensive Proposed Development surveys that have been undertaken.

Request for pavements to be installed on rural roads

- 1 While the Applicant is proposing some permanent upgrades to roads, this is only to enable the safe construction of the Proposed Development. The inclusion of pavements is not necessary to deliver the Proposed Development safely and therefore cannot be justified as a permanent change.

<p>Concern about visual impact on North Devon Coast National Landscape</p>	<p>1 The Applicant has assessed potential visual impacts on the North Devon National Landscape in Volume 4, Chapter 2 of the ES (Document Ref: 6.4.2). This includes a viewpoint within the North Devon National Landscape.</p>
<p>Concern about impact of cabling at landfall on surfing</p>	<p>1 The Applicant engaged with representatives of the surfing community as part of the statutory consultation, as set out in Table 6-6. The use of Horizontal Directional Drilling (HDD) at the point of landfall will avoid disturbance to surf.</p>
<p>Concern about run-off impacts into the River Torridge</p>	<p>1 The Applicant has included measures designed to avoid surface water run-off in the Outline On-CEMP (Document Ref: 7.7).</p>
<p>Socioeconomics</p>	<p>5</p>
<p>Emphasis on the importance of developing a local supply chain</p>	<p>4 The Applicant is committed to using local suppliers where possible and has produced an Outline Skills and Employment Strategy (Document Ref: 7.23) setting out an approach to this.</p>
<p>Request for support for science, technology, engineering and mathematics (STEM) education in local schools</p>	<p>1 The Applicant is committed to contributing to skills development in the vicinity of the Proposed Development and has produced an Outline Skills and Employment Strategy (Document Ref: 7.23) setting out an approach to this. Objective 2 of the Strategy is to support initiatives to promote STEM education, careers and pathways into employment. The Applicant will promote STEM education and work-based learning to raise young peoples' interest in STEM subjects and career paths. The initiatives put in place to take forward this activity will</p>

be designed based on engagement with local schools/education facilities in the early years of the Proposed Development. The Applicant will also explore opportunities to promote STEM education and employment skills for young people not attending school, as those outside of established educational settings are at greater disadvantage and likely be provided with less information about pathways from education into work.

Community benefits	4
Request for further information about community benefits	4 The Applicant sought feedback about potential community benefits as part of the statutory consultation set out in Chapter 6. The Applicant is working with Torrington District Council, North Devon Council and Devon County Council to develop a community benefit package that responds to local need. The Applicant will engage with the community as its plans mature to make sure that community voice has a role in refining our package to meet local needs. The Applicant 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.

3.4 Second public consultation (April – May 2023)

3.4.1 The Applicant conducted a further period of public consultation between 24 April 2023 and 31 May 2023.

- 3.4.2 The focus of this consultation was also the local community in the vicinity of the elements of the Proposed Development onshore. The consultation sought feedback on the Applicant's updated proposals prior to the expected submission of a planning application to Torridge District Council for the onshore elements of the Proposed Development.
- 3.4.3 The Applicant publicised this consultation by:
- Sending a letter to 1234 addresses within 1.5 miles of the converter station site and 0.5 miles of the onshore cable corridor;
 - Sending a letter to parish councils in the same area;
 - Sending a press release to the North Devon Gazette and North Devon Journal; and,
 - Publishing details of the consultation on its website and Facebook page.
- 3.4.4 The Applicant made information available as part of the consultation by:
- Inviting members and officers at Torridge District Council, officers at North Devon Council and the clerks and chairs of parish councils within 1.5 miles of the converter station site and 0.5 miles of the onshore cable corridor to a briefing at Caddstown Industrial Park, Clovelly Rd, Bideford EX39 3BE on 24 April 2023;
 - Home visits to 16 individual residents living close to parts of the Proposed Development;
 - Holding public information days at the following dates, times and locations:
 - 12.30pm – 8.30pm on 26 April 2023 at Huntshaw Parish Hall, Huntshaw, Torrington EX38 7HH;
 - 12.30pm – 8.30pm on 27 April 2023 at Alverdiscott Community Hall, Stoney Cross, Bideford EX39 4PZ;
 - 12.30pm – 8.30pm on 16 May 2023 at Pollyfield Community Centre, Avon Rd, Bideford EX39 4BL; and,
 - 12.30pm – 8.30pm on 17 May 2023 at Caddstown Industrial Park, Clovelly Rd, Bideford EX39 3BE.
 - Publishing the information boards used at the public information days on its website.
- 3.4.5 Copies of consultation publicity materials and the information boards from the public information days are included in **Appendix A-2** (Document Ref: 5.2).
- 3.4.6 The Applicant accepted responses to the consultation through hard copy consultation questionnaires at the public information days, by email and by Freepost.
- 3.4.7 The Applicant received 38 responses to this stage of consultation. **Table 3-3** provides an overview of issues raised and summarises the regard had to them.
- 3.4.8 Key changes made in response to consultation feedback included rotating the eastern converter station building south and west to reduce potential visual impacts.

Table 3-3: Feedback received during the second public consultation between 24 April 2023 and 31 May 2023

Topic:	Frequency:	Regard had by Applicant:
Alternatives and need	25	
Changes to plans following previous consultation address my concerns	8	This is noted.
Support for delivery of low-carbon electricity through Proposed Development	5	This is noted.
Concern about security of supply energy delivered from abroad	4	A lot of power is already imported into the UK, including 20% of electricity demand in in Q2 2024. The recent development of new interconnectors between the UK allows for the import and export of electricity as a complement to domestic generation capacity. The development of new interconnector infrastructure is recognised as having an important role to play as the UK transitions to Net Zero. 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) (DESNZ, 2024) 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.
Support for increased energy security delivered by Proposed Development	4	This is noted.
View that the Planning Act 2008 would be a more appropriate consenting regime	1	The Secretary of State for Energy Security and Net Zero subsequently issued the Section 35 direction, meaning the Proposed Development is now being considered under PA 2008.
Converter stations should be located on site of former Yelland power station	1	The Proposed Development is proposed to connect into the national grid at Alverdiscott National Grid Substation. East

		Yelland substation is 132kV, meaning the transmission system would require upgrades to 400kV, including new overhead lines, to accommodate the Project.
Support for increased energy affordability delivered by Proposed Development	1	This is noted.
Objection to government subsidy for energy projects	1	While the Applicant expects to seek a Contract for Difference, the Proposed Development will receive no direct government subsidy. Details of the funding of the Proposed Development are set out in the Funding Statement (Document Ref: 4.2).
Construction	21	
Concern about duration of construction	4	While construction is expected to take 72 months overall, this will be phased and levels of activity at specific locations will vary. The Applicant presented further information regarding construction techniques as part of the second stage of non-statutory consultation set out in section 3.4 and then in the statutory consultation set out in chapter 6. As part of the DCO application, the Applicant has produced several outline documents and strategies, including an Outline On-CEMP (Document Ref: 7.7) and an Outline CTMP (Document Ref: 7.12). These include measures to avoid, reduce or mitigate disruption during construction.
Concern about traffic impacts during construction	3	The impact of construction on driver delay is assessed in Volume 2 Chapter 5 of the ES (Document Ref: 6.2.5). The assessment considers change at peak times when the baseline traffic flow is highest. Following mitigation included in an Outline On-CEMP (Document Ref: 7.7) and an outline onshore Construction Traffic Management Plan (CTMP) (Document Ref:

		7.12), the Applicant does not expect any significant effects on driver delay. Further information is set out in 5.10.66-5.10.69 of Volume 2 Chapter 5 of the ES (Document Ref: 6.2.5).
Support for inclusion of road improvements within Proposed Development	2	This is noted.
Concern about use of Manteo Way for construction traffic	2	The Applicant considers impacts on the Manteo Way T Junction at 5.10.66 of Volume 2 Chapter 5 of the ES (Document Ref: 6.2.5). No significant effect is expected on driver delay at this location as a result of construction.
Consideration should be given to timing of movements of large machinery	1	As part of the DCO application, the Applicant has produced several outline documents and strategies, including an outline onshore Construction Environment Management Plan (On-CEMP) (Document Ref: 7.7) and an outline onshore Construction Traffic Management Plan (CTMP) (Document Ref: 7.12). These include measures to avoid, reduce or mitigate disruption during construction. These include measures for the management of 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.
Soil damage must be minimised	1	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.
Concern about mud on roads during construction	1	As part of the DCO application, the Applicant has produced several outline documents and strategies, including an outline onshore Construction Environment Management Plan

	<p>(On-CEMP) (Document Ref: 7.7) and an outline onshore Construction Traffic Management Plan (CTMP) (Document Ref: 7.12). These include measures to avoid, reduce or mitigate disruption during construction, such as wheel-washing to avoid impacts from mud on roads.</p>
<p>Request to avoid weekend working close to homes</p>	<p>1 The outline Construction Environment Management Programme (On-CEMP) has been submitted with the DCO application (Document Ref: 7.7). As outlined at Section 1.6.3, 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.</p>
<p>Request to avoid construction traffic movements during school hours at Shepherd's Meadow</p>	<p>1 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. These seek to avoid construction workers travelling during the highway network peak hours and therefore reduce the impact on the highway network. Further information about construction traffic is set out in the Outline CTMP (Document Ref: 7.12).</p>
<p>Further information required regarding construction traffic routing</p>	<p>1 An Outline CTMP (Document Ref: 7.12) has been submitted as part of the DCO application and should consent be granted, a full CTMP will be adopted which will set out suitable construction vehicle routes to be adhered to.</p>
<p>Concern about noise impacts from construction near Abbotsham</p>	<p>1 Construction noise is assessed in Volume 2, Chapter 6 of the ES (Document Ref: 6.2.6). No significant effects from construction noise are identified at Abbotsham.</p>

Concern about use of rural roads during construction

- 1 The Proposed Development includes a haul road to the converter station site to reduce volumes of vehicles on rural roads. An Outline CTMP (Document Ref: 7.12) has been submitted as part of the DCO application and a CTMP will be adopted which will set out suitable construction vehicle routes to be adhered to. These include requiring all contractors to comply with the agreed routeing plans and will ensure that all drivers are informed of the need to restrict HGV movements to those specified routes. If complaints are received that vehicles are not following prescribed routes, the Principal Contractor(s) will be responsible for the implementation of measures to record vehicle routeing, for example by applying spot-checks to ensure that the agreed routes are being adhered to. This will help ensure that construction vehicles do not use roads which have been identified as unsuitable.

Concern about construction impacts in East the Water

- 1 Parts of the route that the Applicant proposes for use by construction vehicles pass through East the Water. The Applicant considers impacts on the Manteo Way T Junction at 5.10.66 of Volume 2 Chapter 5 of the ES (Document Ref: 6.2.5). No significant effect is expected on driver delay at this location as a result of construction. As part of the DCO application, the Applicant has produced several outline documents and strategies, including an outline onshore Construction Environment Management Plan (On-CEMP) (Document Ref: 7.7) and an outline onshore Construction Traffic Management

Concern about increased use of Gammaton Road following road improvements	<p>Plan (CTMP) (Document Ref: 7.12). These include measures to avoid, reduce or mitigate disruption during construction.</p> <p>1 Details of the proposed road widening and other highways improvements are considered in Volume 2, Chapter 5 of the ES (Document Ref: 6.2.5). There will be no improvement of the Gammaton Crossroads junction. The widening of Gammaton Road between Tennacot Lane and Manteo Way for construction traffic accessing the compound will be temporary and reinstated upon completion. Widening of Gammaton Road in other areas is selective only to allow the passage of abnormally large vehicles. There will not be widening of Gammaton Road over its full length. The Applicant expects that the above will not result in attracting rat-running traffic beyond the existing situation.</p>
EIA Concern about environmental impacts of river crossing	<p>20</p> <p>3 Feasibility of HDD methods are discussed in Volume 1, Chapter 3 of the ES (Document Ref: 6.1.3). As outlined in Section 3.7.141-142, all major crossings, such as major roads and river crossings will be undertaken using trenchless technologies. Trenchless crossing methods include auger boring, HDD, thrust boring, and micro-tunnelling. For the purposes of EIA, HDD has been assumed for the major crossings detailed within Figure 3.7 (Document Ref: 6.1). This is the 'reasonable worst case' assumption of construction effects. However, contractors may select trenchless or trenched crossing techniques at other minor features in order to minimise any disruption caused</p>

and thereby lessen any impacts identified as part of the EIA process. Where possible, HDD crossings will be undertaken by lower impact methods, in order to minimise construction impacts beyond the immediate location of works. HDD crossings would be undertaken concurrently (at the same time) along the Onshore High Voltage Direct Current (HVDC) Cable Corridor. Potential impacts from HDD crossings on groundwater are considered in Volume 2, Chapter 4 of the ES (Document Ref: 6.2.4). The River Torridge Crossing is to be crossed by HDD (or other trenchless techniques) which will be developed in accordance with method statements to ensure that existing areas of potential contamination are avoided and that new pathways are not created.

Further information required regarding noise impacts	3 The Applicant presented further information about noise as part of the materials it published as part of its statutory consultation, included in Appendix G-2 (Document Ref: 5.2) of this report, and as part of Volume 2 Chapter 6 of the ES (Document Ref: 6.2.6).
Support for use of landscaping at converter station site	2 This is noted.
Concern about visual impact from converter station	2 The Applicant recognises the potential for visual impacts from the converter station and has therefore submitted an Outline Landscape and Ecology management Plan (LEMP) as part of the DCO application (Document Ref: 7.10). This includes measures to mitigate potential visual impact from the converter station including cut and fill earthworks to provide a suitable development platform for the converter stations whilst

utilising the local topography to integrate the buildings in the landscape. Additional visual screening in the form of constructed earth bunds and planting would further reduce the landscape and visual impact of the converter stations.

<p>Concern about sourcing of materials to be used as part of Proposed Development (e.g. copper, cobalt, lithium)</p>	<p>1 Volume 4, Chapter 1 of the ES (Document Ref: 6.4.1) sets out the assessment of effects in relation to climate change. A whole life assessment has been completed. The whole life assessment is a 'cradle to grave' calculation of all embodied energy and associated greenhouse gas of capital assets across the wider Project considering the mining of raw materials, manufacture, transport, construction, use, maintenance and disposal and considers the renewable energy generated in Morocco. Assessment as part of the ES concludes that avoided greenhouse gas (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>
<p>Request for Proposed Development to include a carbon offset project at the site previously proposed for the converter stations</p>	<p>1 Volume 4, Chapter 1 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 ES 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</p>

	<p>a significant beneficial effect in EIA terms. The Applicant therefore does not consider it appropriate to propose a separate carbon offset project.</p>
<p>Request for mitigation of visual impacts on properties close to converter station site</p>	<p>1 The Applicant recognises the potential for visual impacts from the converter station and has therefore submitted an Outline LEMP as part of the DCO application (Document Ref: 7.10). This includes measures to mitigate potential visual impact from the converter station including cut and fill earthworks to provide a suitable development platform for the converter stations whilst utilising the local topography to integrate the buildings in the landscape. Additional visual screening in the form of constructed earth bunds and planting would further reduce the landscape and visual impact of the converter stations.</p>
<p>Concern about potential impacts on seabed</p>	<p>1 The Applicant has assessed potential impacts on Benthic Ecology in Volume 3, Chapter 1 of the ES (Document Ref: 6.3.1). 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>Concern about impacts on ancient trees at Rocky Lane</p>	<p>1 Following the statutory consultation, the Applicant updated the Proposed Development to relocate a proposed temporary utility corridor south of East Langdon Farm to avoid woodland near Rocky Lane.</p>
<p>Request for enhancement of Kenwith Valley green corridor</p>	<p>1 The Applicant intends to return land over the onshore cable route to current landowners to continue their agricultural operations. Given this, the Applicant has not</p>

		prepared proposals for the use of this land for biodiversity.
Access to coastline must be maintained	1	While the Applicant will need to restrict access to its working area at landfall during construction, overall access to the coastline will be maintained.
Further information should be provided on the onshore cable route	1	The Applicant provided further information about the onshore cable route as part of the consultation materials for the statutory consultation included in Appendix G-2 (Document Ref: 5.2).
The Proposed Development requires an EIA	1	This is provided in the ES (Document Ref: 6).
Concern about impacts on North Devon Biosphere	1	The Proposed Development is within the North Devon Biosphere Reserve. However, the Proposed Onshore HVDC Cable Corridor avoids impacts on all statutorily-designated site for nature conservation and is an underground route with full reinstatement of hedges and existing land uses. Proposed habitat enhancements along the Onshore HVDC Cable Corridor and at the Converter Site will provide compensatory habitat to mitigate for impacts on protected species. Further information is set out in Volume 2 Chapter 1 of the ES (Document Ref: 6.2.1).
Socioeconomics	9	
Emphasis on the importance of developing a local supply chain	7	The Applicant is committed to using local suppliers where possible and has produced an Outline Skills and Employment Strategy (Document Ref: 7.23) setting out an approach to this.
Concern about impact of Proposed Development on ability to sell home	2	The Applicant has sought to avoid, reduce or mitigate potential impacts on properties in the vicinity of the Proposed Development. This has been informed by direct engagement with residents of properties close to the Order limits as part of the

		statutory consultation, as set out in Table 6-6 .
Community benefit	1	
Support for local electricity discounting	1	The Applicant sought feedback about potential community benefits as part of the statutory consultation set out in chapter 6. The Applicant is working with Torridge District Council, North Devon Council and Devon County Council to develop a community benefit package that responds the local need and will share more information later this year. The Applicant will engage with the community as its plans mature to make sure that community voice has a role in refining our package to meet local needs. The Applicant 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.

3.5 Engagement regarding the Section 35 direction

- 3.5.1 On 30 August 2023, the Applicant wrote to the Secretary of State for Energy Security and Net Zero to request that they exercise their powers in respect of Section 35 of PA 2008 with regards the Proposed Development.
- 3.5.2 This recognised that the two converter stations included within the Proposed Development would provide electricity in a manner that would be of National Significance. The Applicant therefore asked the Secretary of State to confirm whether the Proposed Development should be considered as development for which a DCO is required.
- 3.5.3 Before writing to the Secretary of State, the Applicant engaged with Torridge District Council to seek its views on the potential for the Proposed Development to require a DCO. This included meeting with the planning team at Torridge District Council on 16 August 2023.
- 3.5.4 Torridge District Council agreed that the Proposed Development should be considered Nationally Significant and would require a DCO. It wrote to the Applicant on 16 August 2023 to support the consideration of the Proposed Development as nationally significant and requiring a DCO. The Applicant included this letter alongside its own letter to the Secretary of State of 30 August 2023.

- 3.5.5 The Secretary of State directed on 26 September 2023 that they considered the Proposed Development to be nationally significant and that it required a DCO.
- 3.5.6 Following the Section 35 direction, the Applicant provided an update to stakeholders and the community to inform them that the Proposed Development would require a DCO. This included:
- Sending a newsletter to 1234 addresses within 1.5 miles of the converter station site and 0.5 miles of the onshore cable corridor;
 - Writing to elected members and parish and town councils within the same area;
 - Sending a press release to the North Devon Journal and North Devon Gazette; and,
 - Updating the Proposed Development website.
- 3.5.7 Copies of the Applicant’s letter to the Secretary of State, Torridge District Council’s letter to the Applicant, the newsletter sent by the Applicant and the press release issued by the Applicant are included in **Appendix A-3**.

3.6 Further engagement prior to statutory consultation

- 3.6.1 Following the Section 35 direction, the Applicant continued to engage with local authorities, statutory consultees and other stakeholders as it prepared for statutory consultation. Details of ongoing engagement with key stakeholders undertaken following the non-statutory consultation and before the start of the statutory consultation, including the composition of each group, when the engagement took place, and a summary of the engagement is provided in **Table 3-4**. Where engagement referenced below is relevant to EIA, further detail is provided as appropriate in the relevant chapter of the ES (Document Ref: 6).

Table 3-4: Engagement prior to statutory consultation

Date	Consultee:	Summary of engagement:
28 February 2023	Torridge District Council	Meeting regarding landscape and visual impact relating to converter station
February to June 2023	Devon County Council	Engagement with Historic Environment Team regarding trial trenching
15 May 2023	Torridge District Council	Site visit to converter station site
30 June 2023	Sir Geoffrey Cox MP and Alverdiscott and Huntshaw Parish Council	Public meeting organised with Sir Geoffrey Cox MP regarding the Proposed Development
19 October 2023	Torridge District Council	Introduction to the planning process for nationally significant infrastructure.

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21 November 2023	Torrige District Council, Devon County Council and North Devon Council	Meeting with senior leadership and planning teams to introduce the Proposed Development and discuss future engagement.
12 December 2023	Historic England	Introductory meeting regarding offshore aspects of the Proposed Development.
12 December 2023	Torrige District Council	Meeting with the planning team at Torrige District Council to provide feedback on an early draft of the SoCC.
15 December 2023	Maritime and Coastguard Agency	Introductory meeting regarding offshore aspects of the Proposed Development.
18 December 2023	Trinity House	Introductory meeting regarding offshore aspects of the Proposed Development.
9 January 2024	Joint Nature Conservation Committee	Introductory meeting regarding offshore aspects of the Proposed Development.
25 January 2024	Historic England	Meeting to discuss relationship between cable corridors for Proposed Development and other proposed development offshore.
31 January 2024	Environment Agency	Meeting providing an overview of the Proposed Development and to discuss parameters approach, flood risk assessment, statements of common ground, mitigation, scoping, water framework directive and ground investigation.
22 February 2024	Natural England	Introductory meeting regarding offshore aspects of the Proposed Development.
29 February 2024	Public Health Devon	Meeting to discuss Health Impact Assessment methodology.

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14 March 2024	Torridge District Council	Meeting to discuss socioeconomic assessment methodology.
21 March 2024	Marine Management Organisation	Update meeting on offshore elements of the Proposed Development.
8 April 2024	Environment Agency and Devon County Council	Meeting to discuss approach to Volume 2, Chapter 3: Hydrology and Flood Risk of the PEIR.
16 April 2024	Devon County Council highways team	Meeting to discuss transport strategy.
17 April 2024	Historic England	Update meeting regarding offshore elements of the Proposed Development
18 April 2024	Torridge District Council, Devon County Council and North Devon Council	Introductory meeting with wider local authority teams and discussion of Planning Performance Agreements.
18 April 2024 – 16 May 2024 (Fortnightly)	Devon County Council and Torridge District Council	Routine update calls with the planning teams to coordinate wider engagement.
2 May 2024	Planning Inspectorate	Update on Proposed Development prior to statutory consultation.

3.7 Regard had to section 51 advice

- 3.7.1 Section 51 of PA 2008 sets out that advice given to potential applicants on behalf of the Secretary of State must be disclosed to the public by the Secretary of State.
- 3.7.2 The Applicant has had regard to advice given by the Planning Inspectorate under section 51 of PA 2008 in preparing the DCO application. Regard had to section 51 advice is summarised in **Table 3-5**.

Table 3-5: Regard had to section 51 advice

Date of Advice:	Advice:	Regard had:
6 November 2023	The Planning Inspectorate (the Inspectorate) advised that notes of meetings would be taken and published on its website in accordance with section 51 of the Planning Act 2008.	This is noted.
15 January 2024	The Inspectorate recommended the Applicant look at Advice Note 7 on the National Infrastructure website	The Applicant reviewed Advice Note 7 (The Planning Inspectorate, 2020) and Advice Note 12 (The

	for instructions regarding the forthcoming scoping opinion request, including the required format for the GIS shapefile submission, and Advice Note 12 for highlighting any likely significant transboundary effects in the Applicant's Scoping Report.	Planning Inspectorate, 2015) in preparing its Scoping Report.
15 January 2024	The Inspectorate recommended being conscious of cumulative impacts and ensuring the Scoping Report provides a rationale for the approach to the Cumulative Effects Assessment (CEA).	The Applicant's Scoping Report included a rationale for its approach to CEA at section 5.7.
15 January 2024	The Inspectorate recommended that the Applicant be prepared to provide updates of ongoing assessments throughout the process as may be required.	The Applicant has provided updates to PINS at meetings on 15 January 2024 and 2 May 2024.
2 May 2024	The Applicant raised potentially applying under s53 of the PA 2008 for rights of entry for a single plot of land for which it requires access. The Inspectorate advised should this be pursued; the Applicant should ensure it provides the required evidence in support of any s53 application. The Inspectorate advised the Applicant to read Advice Note 5: Section 53 on the Planning Inspectorate's website. The Inspectorate advised that there are no statutory timescales, and that the determination period would depend on the complexity of the request, the quality of the information provided, and the responses received.	The Applicant has continued to seek land access on a voluntary basis and has not submitted an application under s53 of PA 2008 to date.
2 May 2024	The Inspectorate stressed the importance that plans submitted with an application match the DCO and advised the Applicant to pay attention	The Applicant has had regard to this in preparing the plans included in Part 2 of the DCO application (Document Refs 2.1 – 2.9),

	to this in preparing for submission. Further, the Inspectorate advised that the plans must be clear and logical and simple to read in terms of indicating permanent, temporary rights and permanent easements.	which match the draft DCO (Document Ref: 3.1).
2 May 2024	The Inspectorate advised the Applicant to look out for soon to be published guidance on Nationally Significant Infrastructure Project reforms. The Inspectorate also advised that the Inspectorate is in the process carrying out transboundary screening on behalf of the Secretary of State and will inform the Applicant of the outcome, including whether any EEA States will be contacted.	This is noted. The Applicant has considered the updated guidance in preparing its DCO application.
2 May 2024	The Applicant intends to submit the application in November 2024. The Inspectorate advised the Applicant to avoid submitting during the Christmas period to avoid delays in responses	The Applicant submitted its DCO application in November 2024.
22 May 2024	The Inspectorate would like to inform you that as the scoping opinion request for the Xlinks Morocco-UK Power Project was received prior to 30 April 2024, the list of consultation bodies notified and consulted by the Planning Inspectorate before adopting the scoping opinion (as set out in the 'Regulation 11 list' provided to the Applicant as per Regulation 11(1)b of the Infrastructure Planning (Environmental Impact Assessment (EIA)) Regulations 2017), will not reflect the recent amendments to the APFP Regulations. The Applicant is therefore advised to review the transitional	The Applicant included bodies notified through the Regulation 11 list as well as those prescribed as statutory consultees as a result of recent amendments to the APFP Regulations. This included some new bodies. A list of consultees identified and consulted by the Applicant on this basis is included in Appendix E-1 (Document Ref: 5.2) of this report.

provisions in Regulation 4 of the MP Regulations 2024, together with the amendments to the APFP Regulations, and consider whether any new or different consultation bodies should be included in the consultations for the project.

4 EIA SCOPING

- 4.1.1 The Proposed Development is considered to be “EIA development” as defined by the Infrastructure EIA Regulations 2017. As a result, the Applicant proceeded straight to EIA scoping without requesting a screening opinion from the Secretary of State (to confirm whether the Proposed Development was EIA development). As such, the Applicant prepared a Scoping Report in support of its application to the Secretary of State for a Scoping Opinion as to the scope, and level of detail of the information to be provided in its ES.
- 4.1.2 On 30 January 2024, the Applicant submitted its request for a scoping opinion under Regulation 10(1) of the EIA Regulations 2017 to PINS (on behalf of the Secretary of State) and at the same time gave its notification under Regulation 8(1)(b) of the EIA Regulations 2017 that the Applicant proposed to provide an ES in respect of the Proposed Development.
- 4.1.3 A scoping opinion was adopted by the Secretary of State on 7 March 2024. The ES (Document Ref: 6) as part of the DCO application is based on the scoping opinion and the scoping opinion was also considered in the production of the PEIR published during the statutory consultation. The regard had to consultee responses provided with the scoping opinion is set out for each topic in the relevant chapter of the ES (Document Ref: 6).
- 4.1.4 In addition, following receipt of the scoping opinion, the Applicant reviewed the list of consultees contacted by PINS as part of its consultation on the Scoping Report. These are the bodies listed in Appendix 1 of PINS’s Scoping Opinion. This was to ensure that all organisations contacted by PINS were included in subsequent consultation activity.
- 4.1.5 The Applicant did not receive notification of additional consultees under Regulation 11(1)(c) of the EIA Regulations 2017.
- 4.1.6 The Scoping Report is available at the Planning Inspectorate’s portal concerning the Proposed Development. A copy of the response letter from PINS including the Regulation 11 list is provided within **Appendix B-1** (Document Ref: 5.2) of this Report.
- 4.1.7 Compliance with the consultation requirements of Regulations 12 and 13 of the Infrastructure EIA Regulations 2017 is addressed in Chapter 6 of this Report.

5 DEVELOPMENT OF THE STATEMENT OF COMMUNITY CONSULTATION (SOCC)

5.1 Preparation of the SoCC

5.1.1 As prescribed by s47(1) of the PA 2008, the Applicant prepared a SoCC setting out how it proposed to consult people living in the vicinity of the land affected by the Proposed Development about its proposal. Before preparing the SoCC to reflect the requirements of s47 of the PA 2008, the Applicant consulted with each local authority that is within s43(1) of the PA 2008 on a draft of the SoCC, as required by s47(2) of the PA 2008. Prior to that formal consultation, the Applicant had also undertaken various discussions on the SoCC with the relevant local authorities as set out in **Table 3-4**. The Applicant then finalised the SoCC, having regard to the responses from local authorities, before publishing it in accordance with s47(6) of the PA 2008.

5.2 Identification of local authorities within s43(1) of PA 2008

- 5.2.1 At the time of preparing the SoCC, the Applicant identified Torridge District Council and Devon County Council as local authorities within s43(1) of the PA 2008 for the purposes of consultation on the SoCC under section s47(2) of the PA 2008 (the 'host authorities') based on its understanding of the likely Order limits at that point.
- 5.2.2 Given the proximity of parts of the Proposed Development to the administrative area of North Devon Council, the Applicant also formally consulted on the draft SoCC with North Devon Council as though it was a local authority within s43(1) of PA 2008.
- 5.2.3 The Applicant subsequently identified that a small part of the Order limits where there may be oversail by AILs and other highways works is within the administrative area of North Devon Council. As these are highways works, Devon County Council would normally be the relevant planning authority rather than North Devon Council.
- 5.2.4 The Applicant considers that it fulfilled its duty to consult with North Devon Council on the draft SoCC by consulting as though it was a local authority within s43(1) of PA 2008.

5.3 Development of the SoCC

- 5.3.1 The Applicant's preparation of a draft SoCC considered best practice and guidance from the Planning Inspectorate, early engagement with host authorities, outcomes from the non-statutory public consultation, and desk research.
- 5.3.2 This included proactively seeking the views of the host authorities on the Applicant's proposed approach to community consultation during the preparation of the SoCC.
- 5.3.3 Initially, the Applicant discussed consultation at a meeting with Torridge District Council, Devon County Council and North Devon Council on 23 November 2023.

- 5.3.4 Given the extent of the Proposed Development within their administrative boundaries, the Applicant also made an early draft of the SoCC available for review by Torridge District Council on 11 November 2023 and by Devon County Council on 29 January 2024. The Applicant received feedback from Torridge District Council on 12 December 2023 and from Devon County Council on 22 February 2024.
- 5.3.5 The Applicant made changes to the draft SoCC in response to feedback from this early review, including:
- Clarifying the distribution zone for consultation publicity;
 - Clarifying the purpose of deposit points;
 - Clarifying the number of exhibitions proposed as part of the consultation;
 - Clarifying the proposed use of social media as part of the consultation; and,
 - Clarifying the scope of direct engagement with consultees.
- 5.3.6 The draft SoCC shared by the Applicant for consultation was therefore informed by early feedback from the local authorities where the majority of the Proposed Development is located.

5.4 Contents of the draft SoCC

- 5.4.1 The draft SoCC included the following information and proposals for consulting with the local community:
- An overview of the document;
 - A statement of the Applicant's intention to submit a DCO application and details of where to find out more about the planning process;
 - A summary of the Proposed Development;
 - A definition of consultees under s47 of the PA 2008, including four zones of consultation (see **Table 6-3**) categorising consultees based on their vicinity to the Proposed Development;
 - Details of the scope of the consultation as being to seek views on the Proposed Development, the potential short- and long-term impacts of the Proposed Development during construction, operations, and decommissioning, and the PEIR;
 - A consultation period lasting from 16 May 2024 to 27 June 2024;
 - Details of the methods the Applicant proposed to engage with the local community, including:
 - Sending a newsletter summarising the project and how to take part in the consultation to properties in consultation zones 1 and 2;
 - Holding public exhibitions at the venues in consultation zones 1 and 2;
 - Providing copies of consultation materials for review at deposit points in consultation zones 1 and 2 and online via a dedicated page on the Proposed Development website;
 - Contacting parish and town councils, community and voluntary organisations within consultation zones 1 and 2 to offer direct engagement;

- Inviting elected representatives to take part in briefings;
- Publication of consultation information online at a dedicated page for the Proposed Development on the Applicant's website;
- Inviting enquiries and responses online through the Proposed Development website, by Freephone, Freepost or email;
- Hosting a minimum of one webinar about the proposals online during the consultation period;
- Holding a minimum of one public consultation event regarding the offshore elements of the proposals in Bideford;
- Setting out how the Applicant would have regard to comments received and how it would move forward with a DCO application following the statutory consultation.

5.4.2 A copy of the draft SoCC issued to the host authorities for consultation is included in **Appendix C-1** (Document Ref: 5.2).

5.5 Consultation on the draft SoCC

5.5.1 The Applicant wrote to Torridge District Council, Devon County Council and North Devon Council on 25 March 2024 enclosing a copy of the draft SoCC and requesting comments 22 April 2024.

5.5.2 The local authorities identified as within s43(1) of the PA 2008 therefore received 28 days to respond to the draft SoCC, in accordance with s47(3) of the PA 2008.

5.5.3 A copy of the consultation letter to each local authority is included in **Appendix C-2** (Document Ref: 5.2).

5.6 Local authority responses to the draft SoCC

5.6.1 The Applicant received responses to the draft SoCC from Devon County Council on 15 April 2024 and from North Devon Council on 8 April 2024. Torridge District Council did not provide a response to the consultation on the draft SoCC, although they had provided feedback on a pre-consultation draft as set out in paragraph 5.3.4.

5.6.2 Copies of the respective responses are included in **Appendix C-3** (Document Ref: 5.2).

5.7 Regard had to local authority responses to the draft SoCC

5.7.1 The Applicant has had regard to responses from the local authorities consulted on the draft SoCC as required by s47(5) of the PA 2008. Details of the regard had to responses from the host authorities consulted on the SoCC are provided in full in **Appendix C-4** (Document Ref: 5.2).

5.7.2 The Applicant made the following changes to the SoCC having regard to comments from the host authorities it consulted:

- The Applicant scheduled an additional webinar in the consultation period;

- The Applicant included times and dates of consultation events in the published SoCC;
- The Applicant clarified the difference between public exhibitions and public consultation events in the SoCC;
- The Applicant replaced Devon Mobile Library as a proposed deposit point with other local libraries due to its withdrawal from service;
- The Applicant provided further detail about how it would ensure that the consultation event proposed for those interested in the offshore elements of the Proposed Development would reach its intended audience;
- The Applicant provided further detail about how it would engage with identified seldom-heard groups; and,
- The Applicant added further detail of the consultation materials.

5.8 Publication of the SoCC

- 5.8.1 As prescribed by s47(6) of the PA 2008, the Applicant made the SoCC available online at the Proposed Development website, screenshots of which are provided in **Appendix L-1** (Document Ref: 5.2), from 14 May 2024.
- 5.8.2 The Applicant also made the SoCC available to view from the start of the statutory consultation period on 16 May 2024 until the close of the statutory consultation period on 11 July 2024 at:
- Northam Library Fore St, Northam, Bideford EX39 1AW; and,
 - Pollyfield Community Centre Avon Rd, Bideford EX39 4BL
- 5.8.3 The Applicant also publicised the SoCC's availability in a newspaper circulated in the vicinity of the land, as prescribed by s47(6) of the PA 2008. Details of the publication of the notice are included in **Table 5-1**. Copies of the final SoCC and the notice as published (which clearly confirm the name of the publication and the date) are provided within **Appendix D-1** (Document Ref: 5.2).

Table 5-1 Publication of notice of availability of SoCC

Date published	Newspaper
8 May 2024	North Devon Gazette

6 STATUTORY CONSULTATION

6.1 Overview

- 6.1.1 The Applicant conducted a period of statutory consultation on the Proposed Development from 16 May 2024 to 11 July 2024. As consultation had not started prior to 30 April 2024, this meant that the APFP Regulations as amended by the The Infrastructure Planning (Miscellaneous Provisions) Regulations 2024 ('the MP Regulations') applied.
- 6.1.2 The purpose of the consultation was to seek the views of statutory consultees and the public on the Proposed Development; the potential short and long-term impacts of the Proposed Development during construction, operations, and decommissioning; the contribution the Proposed Development could make to the local community; and the PEIR.
- 6.1.3 The Applicant conducted consultation under s42, s47 and s48 of the PA 2008 and Regulation 13 of the EIA Regulations 2017 in parallel. This meant that all materials made available for consultation under s47 and s48 of the PA 2008 were available to consultees under s42 of the PA 2008 and Regulation 13 of the EIA Regulations 2017.
- 6.1.4 Initially, the consultation was publicised as lasting from 16 May 2024 until 27 June 2024. This provided consultees with 42 days to comment, which was greater than the 28 calendar days required to be provided for comments as prescribed by s45(2) of the PA 2008 and Regulation 4(3)(i) of the APFP Regulations.
- 6.1.5 However, the Applicant became aware on 24 May 2024 that Volume 4, Chapter 3: Socio-economics and Tourism was missing from the copy of the PEIR on its website and that Volume 4, Appendix 2.2: Landscape Character Baseline Technical Report and Volume 4, Appendix 2.3: Visual Baseline Technical Report were missing from copies of the PEIR on its website and at deposit locations. The Applicant made the missing sections of the PEIR available online and at deposit points from 29 May 2024.
- 6.1.6 In addition, on 22 May 2024, the Prime Minister called the 2024 General Election for 4 July 2024. While there is no requirement to pause consultation that has already begun during an election period, the Applicant recognised the need to ensure that all consultees had adequate opportunity to respond to the consultation and that the General Election could impact the ability of consultees to respond to the statutory consultation within the original deadline.
- 6.1.7 Taking into account the need to provide the missing sections of the PEIR and the calling of the General Election, the Applicant therefore extended the statutory consultation period for all consultees to 11 July 2024. Details of how the Applicant publicised the extension to the consultation period are set out in this chapter.
- 6.1.8 This provided consultees 43 days to comment once the Applicant had made the missing sections of the PEIR available online and at deposit points. This was greater than the 28 calendar days required to be provided for comments as prescribed by s45(2) of the PA 2008 and Regulation 4(3)(i) of the APFP Regulations.
- 6.1.9 The Applicant therefore does not consider that any consultee was disadvantaged in responding to the statutory consultation as a result of the sections of the PEIR referred to in 6.1.5 being missing from 16 May 2024 to 31 May 2024.

6.2 Consultation under s42 of PA 2008

6.2.1 S42 of the PA 2008 requires the Applicant to consult with the prescribed consultees (s42(1)(a)), relevant local authorities (s42(1)(b)) and landowners, those with an interest in the land and those who would or might be entitled to make a relevant claim (s42(1)(d) and s44).

Identification of consultees under s42(1)(a)

6.2.2 Prescribed consultees are defined in Schedule 1 of the APFP Regulations. This also makes provision through a 'circumstances' test for whether there is a requirement to consult a specific party. **Appendix E-1** (Document Ref: 5.2) sets out each consultee prescribed in Schedule 1 of the APFP Regulations, whether they were included in the consultation, and justification for that inclusion. Regard was had to the Planning Inspectorate's Advice Note Three: EIA Notification and Consultation (The Planning Inspectorate, 2024) in identifying the consultation bodies.

Identification of consultees under s42(1)(b)

6.2.3 S42(1)(b) of the PA 2008 requires the Applicant to consult with the local authorities identified in s43 of the PA 2008, which sets out four categories of authority:

- A is a neighbouring local authority (s43(2)) that shares a boundary with a unitary council or lower-tier district 'B' council within whose area development is situated;
- B is either a unitary council or a lower-tier district council in which the development is situated – a host local authority;
- C is an upper-tier county council in which the development is situated – a host local authority; and,
- D is either a unitary council or an upper tier county council which shares a boundary with a host 'C' authority – a neighbouring local authority (s43(2A)).

6.2.4 Details of the identification of relevant local authorities, including whether they are an A, B, C or D authority, and the criteria for their identification, are included in **Table 6-1**. **Figure 6-1** displays the relationship between the A and B authorities and **Figure 6-2** displays the relationship between the C and D authorities. Full details of consultees under S42(1)(b) are set out in **Appendix E-2** (Document Ref: 5.2).

Table 6-1: Identification of local authorities under s43 of PA 2008

Name	A, B, C or D authority	Criteria for identification
Cornwall Council	A and D	Cornwall Council is a unitary authority which shares a boundary with a B authority, Torridge District Council, and a C authority, Devon County Council.

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Dartmoor National Park Authority	D	Dartmoor National Park shares a boundary with a C authority, Devon County Council.
Devon County Council	C	Devon County Council is an upper-tier local authority which includes part of the Proposed Development
Dorset Council	D	Dorset Council is a unitary authority which shares a boundary with a C authority, Devon County Council
Exmoor National Park Authority	D	Exmoor National Park shares a boundary with a C authority, Devon County Council.
Mid Devon District Council	A	Mid Devon District Council is a lower-tier local authority which shares a boundary with the B authorities, Torrington District Council and North Devon Council
North Devon Council	B	North Devon Council is a lower-tier local authority which includes part of the Proposed Development.
Plymouth City Council	D	Plymouth City Council is a unitary authority which shares a boundary with a C authority, Devon County Council
Somerset Council	A and D	Somerset Council is a unitary authority which shares a boundary with a C authority, Devon County Council and a B authority, North Devon Council
Torbay Council	D	Torbay Council is a unitary authority which shares a boundary with a C authority, Devon County Council
Torrington District Council	B	Torrington District Council is a lower-tier local authority in which the Proposed Development is situated.
West Devon District Council	A	West Devon District Council is a lower-tier local authority which shares a boundary with a B authority, Torrington District Council.

Figure 6-1: A and B authorities (including draft Order limits at time of consultation)

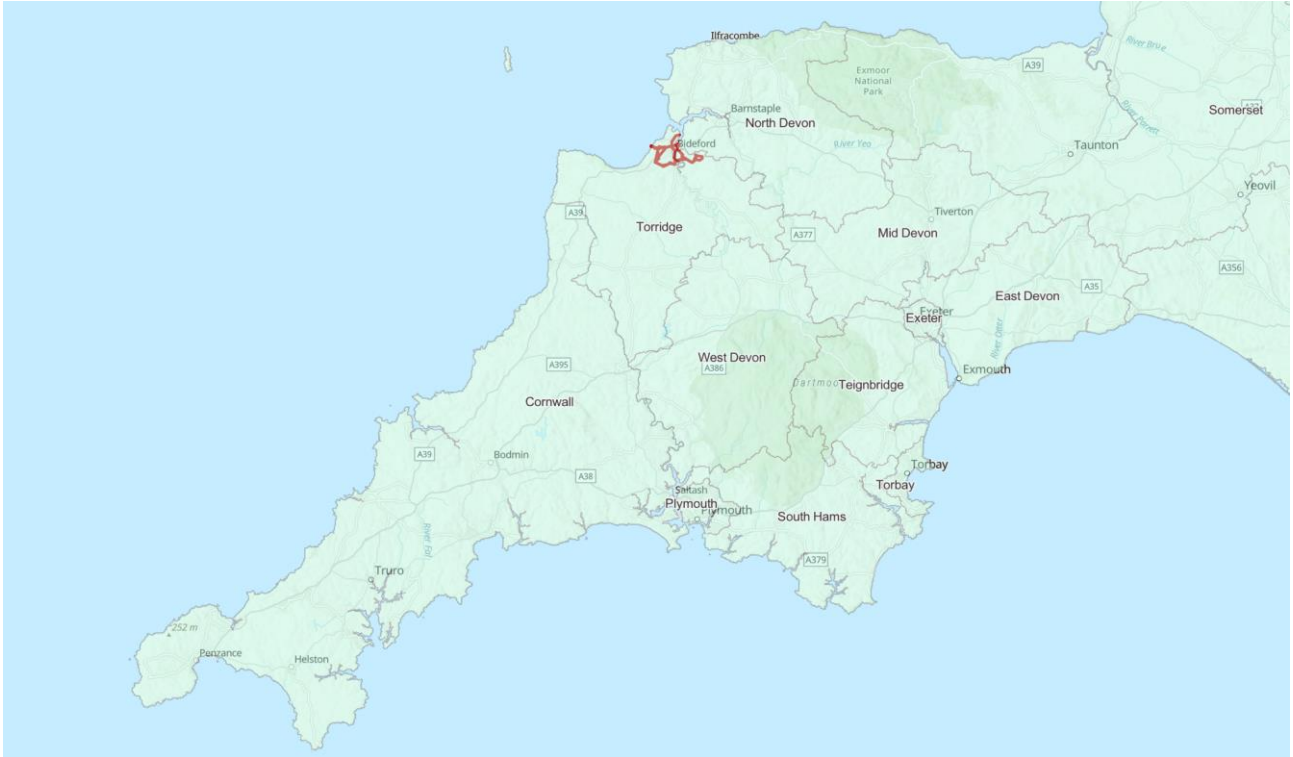


Figure 6-2: C and D authorities (including draft Order limits at time of consultation)



Identification of consultees under s42(1)(d)

- 6.2.5 S42(1)(d) of the PA 2008 requires the Applicant to consult each person who is within one or more of the categories set out in s44 of the PA 2008. This requires the developer to consult with landowners, lessees, tenants or occupiers (Category 1 persons, as per s44(1)); those with an interest in the land or certain powers with respect to the land (Category 2 persons, s44(2)); and those who the Applicant thinks would or might be entitled to make a relevant claim under s44(4) (Category 3 persons).
- 6.2.6 A list of land interests consulted (noting their interest in the land) during the statutory consultation period is provided in **Appendix E-3** (Document Ref: 5.2). Persons as identified within **Appendix E-3** (Document Ref: 5.2) and the Book of Reference (Document Ref: 4.3) (at that time) were consulted.
- 6.2.7 The Category 1 persons were identified via a diligent inquiry process covering six research methods: title information, land interest questionnaire, environmental impact assessment information, host and Companies House searches, site investigations, and internet-based research. Category 2 persons were identified via: title information, requests for information, site visits, and collaboration with the wider project team to identify any interests not identified through the land referencing process. This process informed a landowners' Book of Reference (Document Ref: 4.3).
- 6.2.8 Category 3 persons were identified as persons: who may be able to make a claim pursuant to Part 1 of the Land Compensation Act 1973 (that is, people who live outside the Order limits but whose property may be sufficiently close to be depreciated in value due to noise, vibration, smells, fumes, smoke or light emissions or discharge onto land caused by the use of the authorised project once it is in operation); persons who may be able to make a claim for injurious affection under s10 of the Compulsory Purchase Act 1965 or s152(3) of PA 2008.

Consultation under s42 of PA 2008

- 6.2.9 The Applicant wrote by recorded delivery to consultees under s42(1)(a) and s42(1)(b) of the PA 2008 on 9 May 2024, setting out the background to the Proposed Development, the Applicant's intention to submit a DCO application, the fact that the Applicant had identified them as a consultee under s42(1)(a) or s42(1)(b) of the PA 2008, the documents being provided as part of the consultation, how to respond to the consultation and the deadline for responses. Where possible, a follow up email was also issued to all consultees ensuring they also had digital versions of the materials.
- 6.2.10 The Applicant included in the letter a link to the Document Library on its website including a copy of a consultation booklet, which provided more information about the Proposed Development, plans showing the proposed Order limits, the PEIR and a copy of the consultation questionnaire. A notice of the proposed application which was publicised in accordance with s48 of the PA 2008 and the requirements set out in Regulation 4 of the APFP Regulations was also provided to consultation bodies as required by Regulation 13 of the EIA Regulations 2017.
- 6.2.11 The letter also confirmed that these documents, alongside the PEIR and its non-technical summary, were available electronically on a website maintained by the Applicant, and the website address was provided.

- 6.2.12 The Applicant wrote by recorded delivery to consultees under s42(1)(d) of the PA 2008 with a Category 1 and 2 interest in land on 9 May 2024 setting out the background to the Proposed Development, the Applicant's intention to submit a DCO application, the fact that the Applicant had identified them as a consultee under s42(1)(d) of the PA 2008, how consultees could access the documents provided as part of the consultation, and how to respond to the consultation.
- 6.2.13 The Applicant included in the letter a link to the Document Library on its website including a copy of a consultation booklet, which provided more information about the Proposed Development, plans showing the proposed Order limits, the PEIR and a copy of the consultation questionnaire.
- 6.2.14 Once the Applicant identified that some information was missing from the published version of the PEIR as set out in 6.1.5-6.1.6, it wrote to all identified consultees under s42 of PA 2008 to notify them of the error, how it had made the missing information available and the extension of the consultation period until 11 July 2024 on 31 May 2024.
- 6.2.15 For consultees under s42(1)(a) and (b) of PA 2008, the Applicant included with the letter an updated copy of the notice of the proposed application which was publicised in accordance with s48 of the PA 2008 and the requirements set out in Regulation 4 of the APFP Regulations was also provided to consultation bodies as required by Regulation 13 of the EIA Regulations 2017.
- 6.2.16 Through ongoing diligent enquiry, a number of persons with a Category 3 interest in land were also identified after the start of the consultation period on 16 May 2024. The Applicant wrote to these consultees on 31 May 2024, providing until 11 July 2024 to respond to the consultation. This meant that these consultees were provided with 41 days to respond to the consultation. This was greater than the 28 calendar days required to be provided for comments as prescribed by s45(2) of the PA 2008 and Regulation 4(3)(i) of the APFP Regulations.
- 6.2.17 The Applicant included in the letter a link to the Document Library on its website including a copy of a consultation booklet, which provided more information about the Proposed Development, plans showing the proposed Order limits, the PEIR and a copy of the consultation questionnaire.
- 6.2.18 In addition, following the Prime Minister's announcement that there would be a General Election on 4 July 2024, Torridge District Council and Devon County Council both identified that it would be helpful to be allowed more time to provide responses to the consultation. The Applicant agreed to accept responses from Torridge District Council and Devon County Council by 22 July 2024 at their request.
- 6.2.19 Copies of the letters sent to consultees under s42 of the PA 2008, including those relating to the extension of the consultation period, are included in **Appendix F-1** (Document Ref: 5.2). Consultation materials sent to consultees under s42 of the PA 2008 are available to view in **Appendix G-2** (Document Ref. 5.2).
- 6.2.20 The Applicant also had further engagement with a number of statutory consultees during the statutory consultation period. This is summarised in **Table 6-2** below. Meetings relevant to the preparation of the ES are set out in each relevant chapter of the ES (Document Ref: 6.1 – 6.4)

Table 6-2: Further engagement with statutory consultees

Date	Consultee:	Summary of engagement:
16 May 2024 – 11 July 2024 (fortnightly)	Devon County Council and Torridge District Council	Routine calls with planning teams to coordinate wider engagement.
30 May 2024	Devon County Council	Meeting to discuss travel counts.
4 June 2024	Devon County Council and Torridge District Council	Meeting to discuss General Election taking place on 4 July 2024 and potential extension to the consultation period.
6 June 2024	Environment Agency	Meeting to discuss Flood Risk Action Plan and protective provisions
12 June 2024	North Devon Council	Meeting with the Leader, Deputy Leader and Chief Executive of North Devon Council regarding the Proposed Development and statutory consultation.
16 June 2024	All members of Torridge District Council	A briefing introducing the Project and the Proposed Development, the DCO planning process, and the consultation process.
20 June 2024	Natural England	Discussion regarding Biodiversity Net Gain (BNG)
26 June 2024	Historic England	Meeting to introduce the Proposed Development and provide an overview of the historic environment chapter of the PEIR.
26 June 2024	Devon County Council and Torridge District Council	Meeting to discuss highways design.
8 July 2024	Torridge District Council	Meeting to discuss Landscape Assessment and Torridge District Council's feedback on the landscape and visual assessment included within the PEIR.

6.3 Section 46 (notifying the Planning Inspectorate)

- 6.3.1 Pursuant to s46 of the PA 2008, the Applicant must send the Planning Inspectorate (on behalf of the Secretary of State) the s42 consultation documents on or before commencing the s42 consultation. The Applicant wrote to the Planning Inspectorate on 15 May 2024 to provide the letters and documents listed in 6.2.13.
- 6.3.2 Alongside these documents, the Applicant provided a covering letter which set out the background to the Proposed Development, the Applicant's intention to submit a DCO application, details of the documents included and the fact they would be sent to consultees under s42 of the PA 2008, and a summary of the consultation process.
- 6.3.3 The Applicant received an acknowledgement of the receipt of its notification under s46 of the PA 2008 from the Planning Inspectorate on 15 May 2024.
- 6.3.4 A copy of the letter sent to the Planning Inspectorate and its response is provided in **Appendix F-2** (Document Ref: 5.2) alongside the accompanying consultation materials.

6.4 Section 47 (local community consultation)

- 6.4.1 The Applicant consulted with the local community in accordance with the SoCC provided in **Appendix D-1** (Document Ref: 5.2), as prescribed by s47(7) of the PA 2008.

Definition of consultees

- 6.4.2 For the purposes of community consultation, the Applicant defined three zones of consultation. These are described in **Table 6-3**.

Table 6-3 Zones of consultation

Zone	Parameters
Zone 1	People living and working within an area of 1.5 miles from the converter station site.
Zone 2	People living and working within an area of 0.5 miles from the onshore cable route from the converter stations to landfall.
Zone 3	People living and working in the administrative areas of Torridge District Council, Devon County Council and North Devon Council outside of zones 1 and 2.
Zone 4	People with an interest in the offshore parts of the Proposed Development.

- 6.4.3 In addition, the Applicant consulted a range of relevant community organisations and other relevant bodies in the vicinity of the Proposed Development. These were identified through a combination of desk research, engagement with local authorities and other stakeholders, and the non-statutory consultations. A list of these organisations is included in **Appendix H-1** (Document Ref: 5.2).

Consultation publicity

6.4.4 The Applicant publicised the consultation to the community by:

- Sending a newsletter summarising the Proposed Development and setting out how to take part in the consultation on 15 May 2024 to all addresses in consultation zones 1 and 2;
- Writing to elected representatives, parish and town councils and community groups (as set out in **Appendix H-1** (Document Ref: 5.2)) within consultation zones 1 and 2;
- Writing to the leaders and chief executives of Torrridge District Council, Devon County Council and North Devon Council;
- Sharing a poster with town and parish councils in consultation zones 1 and 2;
- Issuing a press release to media outlets including the North Devon Gazette, Devon Live and BBC Radio Devon;
- Placing adverts and notices in the print editions of the North Devon Gazette (on 8 May 2024) and Fishing News (16 May 2024); and,
- Advertising online via the Devon Live website and posts on the Xlinks Devon Facebook social media page.

6.4.5 Copies of materials used to publicise the consultation to the local community alongside media coverage are included in **Appendix G-1** (Document Ref: 5.2).

Consultation materials

6.4.6 In support of consultation with the community, the Applicant prepared and published materials including:

- A consultation newsletter providing an overview of the Proposed Development and how to take part in the consultation;
- A consultation booklet providing information about the Proposed Development, the planning process, EIA, community benefit and the consultation process;
- A consultation questionnaire designed to allow consultees to respond to the consultation;
- Information boards for use at public consultation events;
- A presentation to be given as part of webinars;
- Plans and maps showing the Proposed Development; and,
- The PEIR with its accompanying non-technical summary.

6.4.7 Copies of the consultation newsletter, consultation booklet, information boards, presentation and plans and maps, along with evidence of availability of the PEIR during the consultation, are available to view in **Appendix G-2** (Document Ref: 5.2).

Consultation activity

6.4.8 The Applicant used a range of techniques to consult the community. These were designed to allow people with different needs across the community to take part in the consultation in a way that is convenient to them.

6.4.9 This included:

- Holding public consultation events, including in-person public exhibitions and webinars including presentation and Q&A, at the times, dates and locations shown in **Table 6-4**;
- Providing copies of the consultation materials listed at 6.4.6 at a number of deposit points in consultation zones 1 and 2 as listed in **Table 6-5** and at a dedicated Document Library on the Applicant’s website;
- Contacting parish and town councils, community and voluntary organisations listed in **Appendix H-1** (Document Ref: 5.2) to offer direct engagement;
- Inviting elected representatives within consultation zones 1 and 2 to take part in briefings;
- Publishing all consultation information online at a dedicated page on the Proposed Development website; and,
- Inviting enquiries and responses online through the Proposed Development website, by freephone, freepost or email.

Table 6-4: Public consultation events

Date and time	Location
Monday, 20 May 2024, 4pm - 8pm	Abbotsham Village Hall, Abbotsham, Bideford EX39 5AP
Tuesday, 21 May 2024, 4pm - 8pm	Alverdiscott Village Hall, Stoney Cross, Bideford EX39 4PZ
Wednesday 22 May 2024, 12.30pm - 4.30pm	Event for offshore stakeholders: Caddsdwn Business Centre, Caddsdwn Industrial Park, Clovelly Rd, Bideford EX39 3BE
Wednesday 29 May 2024, 6pm - 7.30pm	Online via Zoom
Thursday, 30 May 2024, 1pm - 5pm	Pollyfield Community Centre, Avon Rd, Bideford EX39 4BL
Friday, 31 May 2024, 11am - 3pm	Huntshaw Parish Hall, Huntshaw, Torrington EX38 7HH
Wednesday 5 June 2024, 6pm - 7.30pm	Online via Zoom

Table 6-5: Deposit points

Location	Opening hours
Northam Library Fore St, Northam, Bideford EX39 1AW	Monday/Saturday: 10am - 1pm Wednesday/Friday: 10am - 5pm Tuesday/Thursday/Sunday: CLOSED
Pollyfield Community Centre Avon Rd, Bideford EX39 4BL	Monday to Sunday: 9:30am - 11pm

6.4.10 The Applicant also held further engagement with community consultees during the consultation period. This is summarised in **Table 6-6**.

Table 6-6: Further engagement with community consultees

Date	Consultee:	Summary of engagement:
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14 May 2024	Individual residents	Home visits to three individual residents living close to the converter station.
17 May 2024	Representatives of surfing community	Meeting with representatives of the surfing community to discuss horizontal directional drilling at landfall.
31 May 2024	Individual residents	Home visits to two individual residents of Gammaton Road and a resident living close to Cornborough Range.

Collection of responses

- 6.4.11 To capture feedback, the Applicant produced a consultation questionnaire inviting comments on the different elements of the Proposed Development. The questionnaire was made available by direct mail to people living in consultation zone 1, online at the Applicant's website and in hard copy on request.
- 6.4.12 The questionnaire asked the following questions:
- Do you have any comments on our proposals for the converter station site during:
 - A) construction?
 - B) operations?
 - Do you have any comments on our proposals for onshore cables during:
 - A) construction?
 - B) operations?
 - Do you have any comments on our proposals for offshore during:
 - A) construction?
 - B) operations?
 - Do you have any thoughts on benefits to the community and how we can support local initiatives?
 - Do you have any thoughts on opportunities that you feel exist locally to enhance the local environment, particularly biodiversity?
 - Do you have any other comments you think we should consider?
- 6.4.13 Consultees were able to respond by completing a questionnaire online at the consultation website or returning a completed questionnaire by email or to Xlinks Morocco-UK Power Project consultation, FREEPOST SEC NEWGATE UK LOCAL.
- 6.4.14 The Applicant also accepted written responses by email and by letter to Xlinks Morocco-UK Power Project consultation, FREEPOST SEC NEWGATE UK LOCAL.

Changes to consultation arrangements

- 6.4.15 Once the Applicant identified that some information was missing from the published version of the PEIR as set out in 6.1.5, it discussed and agreed its approach to informing the community about the change in arrangements with Torridge District Council and Devon County Council.
- 6.4.16 The Applicant publicised that it had made the missing information available and that it had extended the consultation period until 11 July 2024 by:
- Sending a letter to all addresses in consultation zones 1 and 2;
 - Writing to elected representatives, parish and town councils and community groups (as set out in **Appendix H-1** (Document Ref: 5.2)) within consultation zones 1 and 2;
 - Sending a poster to parish and town councils in consultation zones 1 and 2;
 - Writing to the leaders and chief executives of Torridge District Council, Devon County Council and North Devon Council;
 - Publicising the change in arrangements via the North Devon Gazette, Devon Live and the Fishing News; and
 - Publicising the change online via the Proposed Development website and the Xlinks Devon Facebook social media page.
- 6.4.17 Copies of information publicising the change in consultation arrangements are available in **Appendix G-3** (Document Ref: 5.2).

Compliance with the SoCC

- 6.4.18 Details of the way in which the Applicant complied with commitments made in the SoCC are set out in **Appendix D-2**. In short, the Applicant believes it complied with all commitments made in the SoCC.

6.5 Section 48 (newspaper notices)

- 6.5.1 S48 of the PA 2008 imposes a duty on the Applicant to publish a notice of the proposed application in accordance with Regulation 4 of the APFP Regulations.
- 6.5.2 **Table 6-7** includes details of the newspapers used to publicise the proposed application, including a national newspaper, a local newspaper, a fishing trade journal, Lloyds List and the London Gazette.
- 6.5.3 The first notice published under s48 of the PA 2008 gave the deadline of 27 June 2024 for responses (28 clear days from the date when the last notice was published).
- 6.5.4 The additional notices published following the extension of the consultation period gave the deadline of 11 June 2024 for responses (28 clear days from the date when the last notice was published).

Table 6-7: Publication of newspaper notices under s48 of the PA 2008

Name:	Week 1:	Week 2 (local only):	Re-notice Week 1	Re-notice Week 2 (local only)
National Newspaper				
The London Gazette	16 May 2024		7 June 2024	
The Guardian	16 May 2024		5 June 2024	
Fishing News	23 May 2024		13 June 2024	
Lloyds List	16 May 2024		7 June 2024	
Local Newspaper				
North Devon Gazette	15 May 2024	22 May 2024	5 June 2024	12 June 2024

6.5.5 Copies of the newspaper notices as noted in **Table 6-7** are provided within **Appendix I-1** (Document Ref: 5.2).

6.5.6 In accordance with Regulation 13 of the EIA Regulations 2017, the Applicant issued a copy of the s48 notice to EIA consultation bodies as defined in Regulation 3 of the EIA Regulations 2017 (being those bodies prescribed under s42(1)(a) of the PA 2008 and set out in Schedule 1 of the APFP Regulations and the authorities within s43 of the PA 2008). These bodies are set out in **Appendix E-1** (Document Ref: 5.2). This took place at the same time as publishing notice of the proposed application under s48(1) of the PA 2008, and as the consultation under s42 of the PA 2008 as set out in 6.2. The s48 notice was sent to the prescribed consultees as part of the consultation materials as set out in paragraphs 6.2.10 to 6.2.17.

7 RESPONSES TO THE CONSULTATION

7.1 Chapter overview

- 7.1.1 This chapter of the Consultation Report provides an overview of relevant responses received from consultees under s42, s47 and s48 of the PA 2008, as well as details of the regard had to them by the Applicant.
- 7.1.2 A total of 88 “relevant responses” for the purposes of s49 of the PA 2008 were received in response to the statutory consultation. **Table 7-1** includes a breakdown of responses by response type, **Table 7-2** shows responses by stakeholder type and **Table 7-3** shows the number of responses to each of the questions in the consultation questionnaire.

Table 7-1 Number of responses received by method

Method	Number of responses
Email	61
Online questionnaire	20
Hard copy questionnaire	7

Table 7-2 Number of responses received by type of consultee

Method	Number of responses
Section 42(1)(a)	20
Section 42(1)(b)	3
Section 42(1)(d)	17
Section 47	48
Section 48	0

Table 7-3 Number of responses received to questions within the feedback questionnaire

Question	Number of responses
Q1a. Do you have any comments on our proposals for the converter station site during construction?	15
Q1b. Do you have any comments on our proposals for the converter station site during operations?	14
Q2a. Do you have any comments on our proposals for onshore cables during construction?	20
Q2b. Do you have any comments on our proposals for onshore cables during operations?	18
Q3a. Do you have any comments on our proposals for offshore during construction?	13

Q3b. Do you have any comments on our proposals for offshore during operations?	8
Q4. Do you have any thoughts on benefits to the community and how we can support local initiatives?	19
Q5. Do you have any thoughts on opportunities that you feel exist locally to enhance the local environment, particularly biodiversity?	12
Q6. Do you have any other comments you think we should consider?	16

- 7.1.3 Responses were received, securely recorded and analysed by a consultancy specialising in public consultation and stakeholder engagement. The following process was utilised:
- When a response was received which provided identifying details (e.g., a postcode, company name), the Applicant identified whether the response had been submitted by an individual or organisation under s42, s47 or s48;
 - Each response was assigned a unique ID number, and their feedback was recorded against this number in a secure database;
 - Hard copy questionnaires and letters were manually typed and recorded against the respondent's unique ID number;
 - Responses were analysed at sentence level, using thematic coding to group together comments on similar topics, with unique ID numbers logged against comments to indicate frequency;
 - An individual response was coded in as many layers as required to ensure that the entire sentiment was captured; and
 - The coding process enabled all responses to be indexed according to the issues raised by respondents and allowed a detailed summary to be prepared of the content by themes and topics raised.
- 7.1.4 As recommended by the Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on the Consultation Report (August 2024), in preparing this section, the Applicant considered grouping the responses under the three strands of consultation – s42, s47 and s48 – and then further by their relation to the Proposed Development – prescribed consultees/local authorities, members of the local community and landowners/ those with a land interest. None of the consultees who responded identified themselves as specifically responding to the s48 notice and so there is no separate grouping for s48 notice respondents. The Applicant notes that all consultees prescribed under s42(1)(a) and (b) were required to receive the s48 notice, and those responses are dealt with together in section 7.2. Responses from consultees under s42(1)(d) are addressed in section 7.3. Responses from the local community, consulted under s47, are addressed in section 7.4. The approach to s48 consultees is explained briefly at section 7.5. An overview of changes made in response to consultation feedback is provided at section 7.6.

7.2 Section 42(1)(a) & (b) (s42) consultation: prescribed consultees & local authorities

7.2.1 A total of 23 responses were received from consultees under s42(1)(a) and (b) of the PA 2008. All respondents opted to email comments that did not follow the format of the consultation questionnaire, due to the detailed and specific nature of their comments.

7.2.2 Respondents whose feedback was relevant to the onshore aspects of the Proposed Development included:

- Torridge District Council;
- Devon County Council;
- Cornwall Council;
- Parkham Parish Council;
- Littleham and Landcross Parish Council;
- Braunton Parish Council;
- Alverdiscott and Huntshaw Parish Council;
- Alwington Parish Council;
- Bideford Town Council;
- Environment Agency;
- NATS;
- Somerset Drainage Boards Consortium;
- National Grid Electricity Transmission;
- Devon and Somerset Fire and Rescue Service;
- Natural England;
- Historic England;
- Health and Safety Executive;
- GTC UK Ltd; and,
- The Coal Authority.

7.2.3 Topics raised within these responses included:

- Air quality;
- Alternatives and need;
- Climate;
- Community benefit;
- Construction;
- Cable route;
- Converter station design;
- Ecology;
- Flood risk;

- Geology, Hydrology and ground conditions;
- Historic environment;
- Human health;
- Land use and recreation;
- Landscape and visual impact;
- Location of assets;
- Minerals;
- Noise and vibration;
- Socioeconomics and tourism;
- Transport and access; and,
- Waste.

7.2.4 Respondents whose feedback was relevant to the offshore aspects of development included:

- Torridge District Council;
- Cornwall Council;
- Marine Management Organisation;
- Maritime and Coastguard Agency;
- Natural England;
- Historic England;
- Joint Nature Conservation Committee;
- Environment Agency;
- Trinity House; and,
- Natural Resources Wales.

7.2.5 Topics raised within these responses included:

- Assessment and methodology;
- Construction;
- Design;
- Ecology/benthic ecology/fish and shellfish;
- Fisheries;
- Geology, hydrology, and ground conditions;
- Marine archaeology and heritage;
- Marine environment and mammals;
- Ornithology;
- Physical processes;
- Shipping and navigation; and,
- Socioeconomics.

7.2.6 Comments made by consultees under s42(1)(a) and the Applicant's response to them, are included within **Appendix J-1** (Document Ref: 5.2) of this document. Comments made by consultees under s42(1)(b) and the Applicant's response to them, are included within **Appendix J-2** (Document Ref: 5.2) of this document. Each appendix sets out feedback received from consultees by theme and topic, along with the regard had by the Applicant's and whether the feedback resulted in a change to the Proposed Development.

7.3 Section 42(1)(d) consultation: persons with an interest in land

7.3.1 In response to the consultation carried out under s42(1)(d) and s44 of the PA 2008, a total of 17 consultees responded.

7.3.2 Of these responses, 14 were in a letter format and 3 used the consultation questionnaire format.

7.3.3 The topics raised by the consultees included the following:

- Air quality;
- Alternatives and need;
- Community benefit;
- Consultation;
- Cumulative impacts;
- Ecology;
- Flood risk;
- Human health;
- Landscape and visual impact;
- Noise and vibration;
- Socioeconomics and tourism; and,
- Traffic and transport.

7.3.4 The Applicant has had regard to all comments received from Section 42(1)(d) and 44 consultation in **Appendix J-3** (Document Ref: 5.2). The appendix sets out feedback received from consultees by theme and topic, along with the regard had by the Applicant's and whether the feedback resulted in a change to the Proposed Development.

7.4 Section 47 consultation: local people living in the vicinity of the Proposed Development

7.4.1 This section sets out "relevant responses" for the purposes of s49 of the PA 2008 received from the local community, including a summary of the most common topics raised in feedback received.

7.4.2 The Applicant received 48 responses to the s47 consultation between 16 May and 11 July 2024, with most responses received via email (50%) and the online

questionnaire (35%). The methods available to respond to the consultation are set out at 6.4.11 to 6.4.14.

7.4.3 **Tables 7-4 to 7-12** summarise the most common themes raised in response to each question received via the consultation questionnaire, and the frequency with which they were raised. **Table 7-13** sets out the most common themes in responses that did not follow the questionnaire format.

7.4.4 **Appendix J-4** (Document Ref: 5.2) sets out feedback received from s47 consultees by theme and topic, along with the regard had to the feedback by the Applicant and whether the feedback resulted in a change to the Proposed Development.

Table 7-4 Summary of most common responses to question 1a: Do you have any comments on our proposals for the converter station site during construction?

Theme	Frequency
<i>No comment</i>	9
Concerned about the increase in traffic	8
Concern about cumulative impacts	4
I support the project	3
Noise and dust pollution concerns	3
Concerned about biodiversity impacts	3
It will have a visual impact on the landscape	2
It will impact local property market	1
Concern about carbon emissions from materials	1
Site safety concerns	1

Table 7-5 Summary of most common responses to question 1b: Do you have any comments on our proposals for the converter station site during operations?

Theme	Frequency
<i>No comment</i>	10
Noise pollution concerns	5
Concerned about the increase in traffic	4
I support the project	2
Concerned about biodiversity impacts	1
It will have a visual impact on the landscape	1
It will impact local property market	1
Concerned about the fire risk	1
The Proposed Development is in the wrong location	1
It will damage agricultural land	1
The Proposed Development is too large	1
Concern about relying on another country for energy	1

Table 7-6 Summary of most common responses to question 2a: Do you have any comments on our proposals for onshore cables during construction?

Theme	Frequency
<i>No comment</i>	4

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Concerned about biodiversity impacts	5
Concerned about the increase in traffic	4
Noise and dust pollution concerns	3
It will impact local property market	2
It will impact recreational routes	2
The Proposed Development is too close to properties	2
Would like more information about the timeline	2
It will have a visual impact on the landscape	2
I support the project	1
Concerned about ground water becoming contaminated	1
Want a change to construction hours	1
Converter stations are in the wrong location	1
Concerned about access to the site	1

Table 7-7 Summary of most common responses to question 2b: Do you have any comments on our proposals for onshore cables during operations?

Theme	Frequency
<i>No comment</i>	6
Concerned about the increase in traffic	3
Wants more information about operational hours	2
The Proposed Development is too close to properties	2
It will impact local property market	2
It will have a visual impact on the landscape	2
Noise pollution concerns	1
Feel that compensation is required	1
Would like more information about the timeline	1
Impact on tourism	1
The Project is not detrimental to marine life	1
Concerned about biodiversity impacts	1
Request that existing parking is not used	1
Concerned that the cable could affect solar generation	1

Table 7-8 Summary of most common responses to question 3a: Do you have any comments on our proposals for offshore during construction?

Theme	Frequency
<i>No comment</i>	11
Concerned about impacts on marine biodiversity	7
I support the project	3
The wrong location for cables	1
Concern about electric and magnetic currents	1
It will affect local fishing industry	1
Concerned about national security	1
It will have an impact on surfers	1
Concerned about the increase in traffic	1
Noise and dust pollution concerns	1
Impact on tourism	1
There is a lack of accommodation for the workforce	1

XLINKS' MOROCCO-UK POWER PROJECT

Concerned about water contamination	1
It will have a visual impact	1

Table 7-9 Summary of most common responses to question 3b: Do you have any comments on our proposals for offshore during operations?

Theme	Frequency
<i>No comment</i>	16
Whether they will be secure from damage	3
Safety monitoring is needed	2
I support the project	1
Concern about electric and magnetic currents	1
Concerned about impacts on marine biodiversity	1
It will have an impact on surfers	1
Security risks need to be considered	1

Table 7-10 Summary of most common responses to question 4: Do you have any thoughts on benefits to the community and how we can support local initiatives?

Theme	Frequency
<i>No comment</i>	5
Supporting local initiatives and charities	7
Cannot see any community benefits	6
Employment opportunities for locals	3
Having community access to the renewable energy	3
Improving access roads	2
Planting trees, wildflower meadows and hedgerows	2
Improving footpaths	1
Providing free energy for locals	1
Installing electric vehicle charging points	1
Improving public transport	1
Providing insulation upgrades for older residents	1

Table 7-11 Summary of most common responses to question 5: Do you have any thoughts on opportunities that you feel exist locally to enhance the local environment, particularly biodiversity?

Theme	Frequency
<i>No comment</i>	12
Liaising with local wildlife trusts and organisations	3
Increasing biodiversity	3
Planting trees, meadows and hedgerows	2
Providing cheaper electricity for the area	1
Creating footpath and cycling access	1
No help to increase biodiversity is needed	1
Not understanding the question	1
Supporting locals to install rooftop solar	1

Table 7-12 Summary of most common responses to question 6: Do you have any other comments you think we should consider?

Theme	Frequency
<i>No comment</i>	8
It will impact local property market	2
Fears around the uncertainty of the project	2
It is the wrong location	2
Concerned about effects on mental health	1
Security risks need to be considered	1
That the cost of the electricity would be high	1
Concerned about relying on another country for energy	1
Want to know how Xlinks will profit	1
Concerned by the effect on local angling	1
I support the project	1
Generally do not support the project	1
Concerned that it will increase climate change	1
Would like more input in the process from National Grid	1
Concerned about the carbon impact of construction	1
Queries about the timeline of the project	1
Concerned about loss of footpath access	1
Would like wider community benefits	1
Support for other forms of renewable energy	1
Concerned about the impact to biodiversity	1

Table 7-13 Breakdown of most common responses from feedback not following questionnaire format

Theme	Frequency
Noise and dust pollution concerns	9
Concerned about increased traffic in the area	9
It will have a visual impact on the landscape	8
Concerned about the impact to biodiversity	4
It will impact tourism	4
The Proposed Development is too close to properties	4
It will affect local property market	3
There need to be community benefits	2
Concerned about workforce accommodation	2
Requested compensation for residents	2
I support renewable energy	2
Would like footpath access to be improved	2
Concerned about relying on another country for energy	2
Questioned Applicant's experience	1
Requested ongoing community consultation	1
Concerned about the reliance on National Grid's plans	1
Concerned about impact on surfers	1
Concerned about access roads and safety	1
Queries about impact on UK economy	1
Requested information on location of pumping station	1

Long term benefits of the training of local people	1
Concerned about impacts on agricultural land	1
Concerned about carbon impact of construction	1

7.5 Responses under section 48

- 7.5.1 As set out in 7.1.2, the Applicant solicited responses from consultees under s48 of the PA 2008.
- 7.5.2 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.

7.6 Changes to the Proposed Development following statutory consultation

- 7.6.1 In response to feedback received through the statutory consultation, the Applicant made the following changes to the Proposed Development:
- Inclusion of land to the west side of Hubbastone Road within the Order limits to account for potential oversail by AILs;
 - Extension of the Order limits to the north of the proposed operational road footprint north of Gammaton Cross to allow for utilities diversion;
 - Relocation of a proposed temporary utility corridor south of East Langdon Farm to avoid an area of woodland;
 - Inclusion of land adjacent to Manteo Way within the Order limits to account for potential oversail by construction vehicles; and,
 - Diversion of utilities north of Alverdiscott National Grid Substation to include an existing 11kV pole north of Alverdiscott National Grid Substation, avoiding the need to divert two 11kV overhead lines.
- 7.6.2 The Applicant did not adopt a number of changes to the Proposed Development requested in statutory consultation. In summary, these included:
- Including permissive paths or wildlife corridors in parts of the onshore cable corridor. The Applicant is required to return land within the onshore HVDC cable route corridor to current landowners to continue their existing use. The Applicant has no legal ability to develop public footpaths or other uses as part of the Proposed Development;
 - Sharing its cable corridor with other developments proposed in the region, notably the White Cross Wind Farm. This is not possible due to the different points that the developments are proposed to connect into the national grid;
 - Connecting into the national grid at another location. 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 Applicants need 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 stations and a lower risk of interactions with nearby infrastructure. Further information is presented in Volume 1, Chapter 4 of the ES (Document Ref: 6.1.4);

- Adopting a landfall point other than Cornborough Range. The Applicant has assessed alternative landfall locations 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). 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;
- Providing finalised design details as part of the DCO application rather than design principles or a design code. The use of Design Principles (design code) has been discussed with both Torridge District Council and Devon County Council in regular planning officer and landscape specific meetings following the submission of the PEIR. The Applicant has proposed a parameter-based approach which will be further informed during detailed design by the appointed Construction contractors. The Design Principles provide a set of principles for which the Construction contractors must comply in the development of the detailed design and provide Torridge District Council (as the detailed design approval authority for the Converter Site) a set of principles to assess the proposed detailed design. The Design Principles document 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. 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 and the Environment Agency. The Design Approach Document (Document Ref: 7.3) provides further details on the proposed design approach following submission of the DCO application;
- Moving the Gammaton Road construction compound. 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. The reasons for the selection of the Gammaton Road construction compound included:
 - the requirement for a suitably sized site near the converter station site to minimise the overall size of the converter station site;
 - the need to minimise the distance HGV and AILs need to travel between a main compound and the converter station 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 station 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.
- The small number of residential properties located within close proximity to the proposed site; and,
- Support of use by the landowner.
- Reducing the height of construction compound fencing. The construction phase fencing requirements will be confirmed through the On-CEMP by the Construction Contractor in accordance with the Outline On-CEMP (Document Ref: 7.7); and,
- Improving walking and cycling facilities to ensure that staff accessing construction compounds can use non-car modes. 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 local authorities and local residents on Gammaton Road.

7.6.3 Full details of all responses to the statutory consultation, as well as the regard had to them by the Applicant, are set out by type of consultee and theme in **Appendices J-1 to J-5** (Document Ref: 5.2).

8 FURTHER CONSULTATION AND ENGAGEMENT

8.1 Overview

- 8.1.1 Following the statutory consultation, the Applicant continued to engage with stakeholders as it prepared its DCO application.
- 8.1.2 This included direct engagement with a number of stakeholders to discuss their responses to the statutory consultation and develop agreement on key issues. This is summarised in section 8.2.
- 8.1.3 The Applicant also made a number of minor changes to the Order limits which required targeted consultation with relevant consultees of the Planning Act 2008. This is summarised in section 8.3.

8.2 Engagement following statutory consultation

- 8.2.1 Throughout the development process, the Applicant has engaged with stakeholders outside of the non-statutory and statutory consultation periods. Details of ongoing engagement with key stakeholders undertaken following the statutory consultation and before the submission of the DCO application, including the composition of each group, when the engagement took place, and a summary of the engagement is provided in Table 8-1. Where engagement referenced below is relevant to EIA, further detail is provided as appropriate in the relevant chapter of the ES (Document Ref: 6.1).

Table 8-1: Engagement following statutory consultation

Date	Consultee	Nature of engagement
From 13 August 2024 to submission of DCO application (weekly)	Devon County Council and Torrridge District Council	Weekly coordination call with officers at Devon County Council and Torrridge District Council. From 24 September 2024 this included a review of an issues tracker for matters raised by the councils through their responses to the statutory consultation and subsequent engagement.
6 August 2024	Torrridge District Council	Meeting regarding draft illustrative landscape and ecological strategy plan
12 August 2024	Natural England	Progress update and review of comments received through statutory consultation

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12 August 2024	Environment Agency	Meeting to discuss fisheries and water quality following statutory consultation
19 August 2024	Historic England	Update meeting regarding offshore elements of the Proposed Development
5 September 2024	Environment Agency	Progress update
9 September 2024	Torrige District Council	Meeting regarding revised illustrative landscape and ecological strategy plan
12 September 2024	Devon County Council	Meeting to confirm interests in land held by Devon County Council relevant to the Proposed Development and to respond to questions from Devon County Council's land team
23 September 2024	Historic England	Meeting regarding response to statutory consultation, approach to Alverdiscott Iron Age enclosure and Roman marching camp, and visualisations
25 September 2024	Devon County Council	Meeting regarding temporary accommodation strategy for construction workers
27 September 2024	Torrige District Council	Meeting regarding temporary accommodation strategy for construction workers
30 September 2024	Torrige District Council	Meeting providing update on ecology surveys
4 October 2024	Devon County Council, North Devon Council and Torrige District Council	Meeting regarding potential approaches to community benefits relating to the Proposed Development
11 October 2024	Historic England	Progress update regarding marine archaeology
14 October 2024	Planning Inspectorate	Project update meeting
17 October 2024	Marine Management Organisation	Meeting regarding response to statutory consultation and deemed Marine Licence
18 October 2024	Historic England	Update meeting regarding offshore elements of the Proposed Development
21 October 2024	Natural England	Meeting regarding protected species
8 November 2024	Centre for Environment, Fisheries and Aquaculture Science and Marine Management Organisation	Meeting regarding construction activities which includes some winter activities, and the latest

potential impact
assessment on brown crab,
European lobster, and
crawfish

8.3 Targeted consultation

- 8.3.1 Following the statutory consultation set out in Chapter 6, the Applicant made a number of minor changes to the Order limits having regard to feedback from the consultation, and in light of further work on the Proposed Development's design and environmental impacts.
- 8.3.2 These changes, broadly speaking, were to facilitate potential oversail by vehicles with AILs during construction and to facilitate utilities diversions. The location and nature of the proposed changes subject to targeted consultation are summarised below:
- **Hubbastone Road:** Further assessment identified the potential for oversail by AILs to the west of Hubbastone Road. This area was added to the Order limits to secure the ability of AILs to travel along this route – no permanent use of land is proposed.
 - **Diversion of utilities north of Gammaton Cross:** Further assessment of the proposed operational access road north of Gammaton Cross identified existing utility connections that may be adversely affected by the construction of the proposed operational access road. An extension of the Order Limits was required north of the proposed operational road footprint to facilitate the diversion of existing utilities and reconnection on Gammaton Road.
 - **Diversion of utilities south of East Langdon Farm:** Further assessment and discussion with consultees in order to have regard to their consultation response identified that the temporary utility corridor south of East Langdon Farm should be moved further southwards to avoid an area of woodland. This required a change to the Order limits.
 - **Manteo Way:** Further assessment identified the potential for limited oversail by construction vehicles in a small part of the proposed route along Manteo Way. These areas need to be included within the Order limits to secure the use of the route for construction vehicles - no permanent use of land is proposed.
 - **Diversion of utilities north of Alverdiscott National Grid Substation:** Further engagement with consultees in order to have regard to their consultation response identified an opportunity to extend the Order limits by around 6 metres to include an existing 11kV pole north of Alverdiscott National Grid Substation. This would avoid the need to divert two 11kV overhead lines.
- 8.3.3 The changes were purely to facilitate the temporary diversion of utilities and ensure that the Applicant acquires the appropriate powers for access during construction. They did not affect the outcomes of the EIA set out in the PEIR during the statutory consultation.

Identification of consultees

- 8.3.4 The Applicant considered the guidance provided by the Planning Inspectorate's Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (Planning Inspectorate, 2024) in identifying consultees:

- *Only where the project taken as a whole changes very significantly, and to such a large degree that what is being taken forward is fundamentally different from what was previously consulted on, should re-consultation on the proposed application as a whole be considered.*
- *In understanding whether there has been a material and substantial change, applicants should take into account the following guiding factors:*
 - *the degree of change as compared to the proposals previously consulted upon as a whole;*
 - *the number of materially worse environmental effects as compared to what has been the subject of previous consultations; and*
 - *the level of public interest, and the likelihood that such interest would merit further consideration in the context of that change.*
- *For any material change to a part of the proposed application where the project as a whole is not fundamentally changed, for example in the case of linear aspects where new information leads to a new alignment for a particular section of the proposal, a bespoke and targeted approach to further consultation can be adopted, which can address the specific consultation obligations arising proportionately.*
- *Targeted consultation can be statutory or non-statutory or a combination of the two depending on whether new persons needing to be consulted under section 42 of the Planning Act have been identified, but such targeted consultation will not require the production of PEI provided proportionate and appropriate information on environmental implications of any changes, where necessary, is provided.”*

8.3.5 The Applicant considered that the proposed changes to the Order limits were minor, did not introduce materially worse environmental effects as compared to those assessed in the PEIR, and were unlikely to generate significant public interest.

8.3.6 It therefore opted to take a targeted approach to consultation with those potentially affected. The Applicant considered these to be people with an interest in land affected by the proposed changes. The Applicant identified these parties using the same process of diligent inquiry set out in 6.2.5 – 6.2.8. This process was repeated with this change to the Order limits to ensure that any additional identified interests were consulted.

8.3.7 Through diligent inquiry, the Applicant considers that there are no persons who might be entitled to make a relevant claim as a Category 3 interest pursuant to Part 1 of the Land Compensation Act 1973. This is in relation to the factors set out in the Book of Reference (Document Ref: 4.3).

8.3.8 Statutory undertakers were also contacted to query whether they had any infrastructure on or over the new land being included the Order limits.

8.3.9 A list of consultees is included in **Appendix K-1** (Document Ref: 5.2).

Consultation

8.3.10 The Applicant wrote by recorded delivery to identified consultees to notify them of the changes and invite comment for a 28 day period between 6 September 2024 and 7 October 2024. The Applicant enclosed an updated Order limits plan with the

letter. Copies of the letters and plan are available in **Appendix K-2** (Document Ref: 5.2).

- 8.3.11 During this targeted consultation, the Applicant continued to make all the consultation materials available to consultees through the Proposed Development website, including the PEIR.
- 8.3.12 All consultees were given a minimum of 28 days to respond to the targeted consultation. The Applicant wrote to each consultee by recorded delivery.
- 8.3.13 Given that this consultation activity was targeted to a small number of consultees, the Applicant did not collect responses through an online questionnaire. Instead, the Applicant invited consultees to respond in writing by Freepost or to the project email address.

Results

- 8.3.14 The Applicant has had due regard to responses from the period of targeted consultation described in 8.3.8-8.3.11.
- 8.3.15 One consultee, Devon County Council, responded to the consultation. Issues raised through the consultation and the regard had to them by the Applicant are set out in **Table 8-2**.
- 8.3.16 The response is set out in full alongside the Applicant’s response in **Appendix K-3** (Document Ref: 5.2).
- 8.3.17 The response did not seek any design changes and so the regard had by the Applicant does not involve any changes to the design of the Proposed Development.

Table 8-2: Responses to targeted consultation and regard had by the Applicant

Response	Regard had by the Applicant
Devon County Council requires clarification as to how specific issues that would ordinarily be covered by the licenses, permissions and agreements under the relevant sections of legislation including, the Highways Act 1980, the New Roads & Street Works Act 1991 and the Road Traffic Regulation Act 1984 would be addressed. This includes contractor insurance and public liability; bonds; inspection fees; arbitration and disputes; change control; quality assurance; any required Traffic Regulation Orders (TROs) or Temporary TROs (TTROs). The Council cannot make any substantive comment until further details are received.	The draft DCO (Document Ref: 3.1) includes a requirement to seek approval of the detailed design of highways works from Devon County Council.
The Order, or any other agreement required, should take into account any street furniture not currently in place but which may be installed prior to works commencing, should the Order be made.	The draft DCO (Document Ref: 3.1) includes an article to allow the removal and replacement of street furniture.

Devon County Council would like it noted that compensation for any easement rights related to Devon County Council land will need be discussed at a later suitable date albeit this is not a matter for the Examining Authority should the DCO be accepted for examination. It is likely however that the Council will require commuted sums for maintenance purposes for any land that will be transferred to the Council. Should the need to acquire the freehold of Devon County Council land arise, the Council must be immediately notified.

The Applicant is not seeking to acquire the freehold of any Devon County Council land. The Applicant will discuss compensation for any easement rights with Devon County Council directly. Any commuted sums would be agreed within a s278 agreement.

It is noted that there is the possibility for 'frac-outs' to occur in areas where horizontal directional drilling is taking place. Any implications of a 'frac-out' on public highways and transport infrastructure should be considered in the submission.

The Outline Bentonite Breakout Plan (Document Ref: 7.20) includes measures to manage frac-out, including notification.

The Devon County Council land affected by the works should be the absolute minimum necessary to deliver the scheme and prior agreement of the working arrangements is required, on the basis that any damage resulting from the works shall be made good to the satisfaction of the Council and upon condition that the constructors and operators shall maintain suitable insurance cover and shall indemnify the Council against any damages, claims, costs expenses and liabilities etc. arising from the installation and existence of the equipment on its land.

The Applicant confirms that use of Council land has been kept to the absolute necessary minimum to deliver the Proposed Development. Where access is required, prior agreement of working arrangements will be sought, noting that the majority of Council land potentially affected by the Project is within the highway corridor and is associated with ALL movements which will have their own agreement process in line with existing policy and legislative requirements for ALL movements (i.e. engagement with Police, National Highways and Local Highways Authorities). The Applicant anticipates that any requirements for maintenance following use of the relevant highway network will be managed through section 106 or section 278 agreements.

Devon County Council would welcome early and continued engaged from Xlinks to properly understand and assess the likely impacts from a land perspective in addition to the other aspects of the proposal.

The Applicant has continued to engage with Devon County Council as set out in **Table 8-1**. It will continue to engage with Devon County Council.

9 CONCLUSION

- 9.1.1 This Consultation Report forms part of the Application for the Proposed Development and is submitted in accordance with section 37(3)(c) of the PA 2008. This Consultation Report describes the pre-application consultation and engagement undertaken by the Applicant, summarises the responses received and explains how the Applicant has had regard to them to develop its proposals.
- 9.1.2 It also demonstrates how the consultation has met and exceeded the requirements set out in sections 42, 47, 48,49 and 50 of the PA 2008 (as well as the requirements of the APFP Regulations and EIA Regulations) and that the Applicant has complied with guidance on the pre-application process and compiling the consultation report (see **Appendices M-1 and M-2** (Document Ref: 5.2)).
- 9.1.3 Feedback has been integral to the design of the Proposed Development, which has helped to shape the Applicant's proposals from the outset of pre-application consultation activity. Throughout the process of preparing the design of the Proposed Development, the Applicant has sought to involve and engage a wide range of stakeholders and the local community.
- 9.1.4 Prior to the designation of the Proposed Development as nationally significant, the Applicant conducted two stages of non-statutory consultation. This informed the Proposed Development as presented by the Applicant as part of statutory consultation.
- 9.1.5 Key changes made by the Applicant to the Proposed Development as a result of consultation and engagement prior to its designation as nationally significant included:
- Moving the converter station site from a proposed location north of Gammaton Cross to its currently proposed location at the Old Webbery Showground;
 - Amending the proposed cable corridor to avoid new homes and a school in Abbotsham; and,
 - Moving the eastern converter station building south and west within the converter station site.
- 9.1.6 Statutory consultation sought feedback on the Proposed Development, along with the PEIR which presented the initial findings of the environmental assessments and preliminary information on mitigation measures.
- 9.1.7 Following statutory consultation, the Applicant made the following key changes to the Proposed Development including:
- Inclusion of land to the west side of Hubbastone Road within the Order limits to account for potential oversail by AILs;
 - Extension of the Order limits to the north of the proposed operational road footprint north of Gammaton Cross to allow for utilities diversion;
 - Relocation of a proposed temporary utility corridor south of East Langdon Farm to avoid an area of woodland;
 - Inclusion of land adjacent to Manteo Way within the Order limits to account for potential oversail by construction vehicles; and,

- Diversion of utilities north of Alverdiscott National Grid Substation to include an existing 11kV pole north of Alverdiscott National Grid Substation, avoiding the need to divert two 11kV overhead lines.
- 9.1.8 The Applicant also carried out an additional targeted consultation which sought feedback on minor changes to the proposed Order limits.
- 9.1.9 The Applicant did not receive any feedback requiring changes to the design as a result of the targeted consultation.
- 9.1.10 Formal stages of pre-application consultation were complemented by an ongoing programme of engagement with stakeholders, including the host authorities, prescribed consultees, near neighbours and the local community. In doing so, the Applicant has sought to exceed the minimum requirements set out in the PA 2008 and in the Applicant's SoCC.
- 9.1.11 The Applicant is very grateful to all those who have responded to the consultation and engaged with the team to help shape the Proposed Development.

10 REFERENCES

Department for Energy Security and Net Zero (2024). National Policy Statement for electricity networks infrastructure (EN-5).

Ministry of Housing, Communities and Local Government (2024). The Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects.

The National Archives (2009). The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (having regard to the changes made in The Infrastructure Planning (Miscellaneous Provisions) Regulations 2024).

The National Archives (2017). Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations 2017).

The National Archives (2008). The Planning Act 2008.

The Planning Inspectorate (2024). Nationally Significant Infrastructure Projects: Advice on the Consultation Report. A

The Planning Inspectorate (2024). Nationally Significant Infrastructure Projects - Advice Note Three: EIA notification and consultation.

The Planning Inspectorate (2020). Nationally Significant Infrastructure Projects - Advice Note Seven: Environmental Impact Assessment: process, preliminary environmental information and ESs.

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