

XLINKS' MOROCCO-UK POWER PROJECT

Consultation Report

**Annex A: Pre-DCO consultation
Appendices A-1 to A-3**

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November 2024

For Issue

XLINKS' MOROCCO – UK POWER PROJECT

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Prepared by:

SEC Newgate UK Ltd

Prepared for:

Xlinks 1 Limited

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1 INITIAL NON-STATUTORY CONSULTATION

1.1 Letter to consultees



Our Ref:

9th November 2022

Name
Address1
Address2
Address3
Address4
Postcode

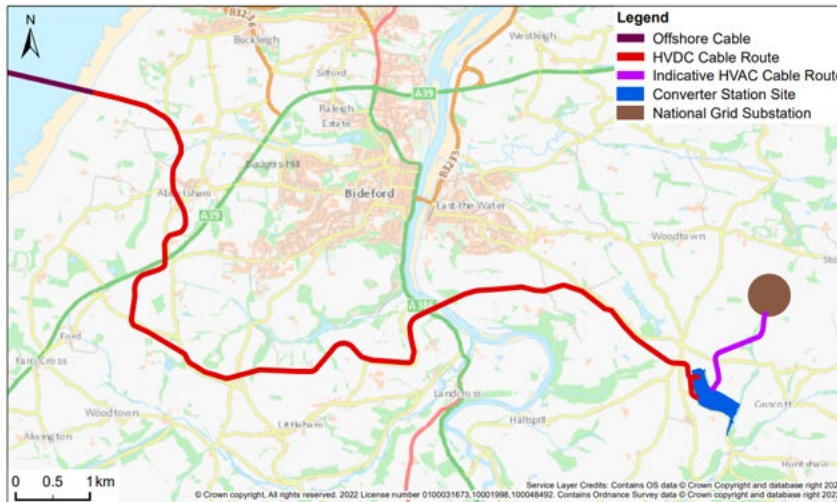
Dear

Xlinks UK Onshore Development

We write to notify you that Xlinks Ltd intends to submit a planning application to Torridge District Council for a renewable energy project in North Devon.

The Xlinks Morocco-UK Power Project will establish a direct electricity connection from Morocco to the UK. The project will deliver 3.6GW of reliable renewable electricity (from solar and wind energy combined with battery storage) to the national grid, representing around 8% of Great Britain's annual electricity needs, enough to provide low cost, clean power to over seven million British homes by the end of the decade.

Indicative Site Location Plan:



Xlinks Limited. Registered in England & Wales. Company Number 11891505
Registered Office: Kingfisher House, 1 Radford Way, Billericay, CM12 0EQ
Website: xlinks.co. Email: hello@xlinks.co

The onshore development will seek to gain planning permission for c.14.7km of underground High Voltage Direct Current (HVDC) cabling, from landfall at [Cornborough](#) to a new converter station site to the southwest of the existing national grid substation located between [Gammaton](#) and [Alverdiscott](#). Connection to the national grid substation via underground High Voltage Alternating Current (HVAC) cables does not form part of this planning application.

As a near-constant supply, averaging twenty hours a day, the project delivers reliable renewable power, free from the environmental and weather constraints holding back the continued expansion of UK-based generation. As such, the project has the scale and ambition to make a real, positive contribution to securing the UK's renewable energy future.

We intend to submit a planning application early next year and are holding Public Information Days to share information about our plans and seek feedback from stakeholders and the local community. These are drop-in events and are being held on:

Wednesday 23rd November 2022 from 12.30pm to 8.00pm
Huntshaw Parish Hall, Huntshaw, Devon, EX38 7HH

Thursday 24th November 2022 from 12.30pm to 8.00pm
[Caddsdow](#)n Business Support Centre, [Caddsdow](#) Industrial Park, Clovelly Road, Bideford, Devon, EX39 3DX

The consultation will be open for 21 days commencing on **Wednesday 23rd November 2022** with the deadline for comments being **Tuesday 13th December 2022**. From commencement of public consultation wider project information and all materials being exhibited at the Public Information Days will be made available on the project website at www.xlinks.co/devon.

You can also send us your feedback via any of the channels listed below:

Feedback form – available at the Public Information Days and online at www.xlinks.co/devon. We will also post hard copies upon request

Email – hello@xlinks.co

Post – [Xlinks](#) Ltd, Kingfisher House, 1 Radford Way, Billericay, CM12 0EQ

Phone – 01271 268830

Should you have any queries about the project, or the consultation process, please feel free to contact the project team via the contact details noted [on](#) this letter, or via the website.

Yours sincerely



David Kelly
[Xlinks](#) UK Development Manager

[Xlinks](#) Limited. Registered in England & Wales. Company Number 11891505
Registered Office: Kingfisher House, 1 Radford Way, Billericay, CM12 0EQ
Website: xlinks.co. Email: hello@xlinks.co

1.2 Press release



November 21st, 2022

XLINKS HOLDS PUBLIC CONSULTATION ON GROUND-BREAKING RENEWABLE ENERGY CONNECTION PLAN

- *Calls for local input in Devon to capture views on proposal to connect 3.6GW of low-cost, reliable, renewable power from Morocco to the GB electricity grid*
- *Proposals are a vital part of the Xlinks Morocco-UK Power Project, which aims to help lower consumer energy prices, enhance national energy security, and meet decarbonisation targets*

Xlinks, a private renewable energy company headquartered in the UK, will this week begin a period of public consultation in Devon regarding its plans to connect 3.6GW of reliable renewable energy from Morocco to the GB electricity grid. The company is calling for local input to further shape its plans, minimise potential disruption during construction, and maximise benefit to the region.

A series of Public Information Days will be held to share with the Devon community proposals for 14.7km of underground High Voltage Direct Current (HVDC) cabling, from landfall at Cornborough, and construction of a HVDC to High Voltage Alternating Current (HVAC) converter station site to the southwest of the existing National Grid substation located between Gammaton and Alverdiscott.

Having worked with National Grid to identify the optimal location to connect to the GB electricity grid, Xlinks has developed its plans in line with the rural character of North Devon. All cables will be installed underground, with land reinstated to its previous use. There will be no permanent infrastructure above-ground along the route. Upon completion, the Xlinks Morocco-UK Power Project will be capable of meeting approximately 8% of Britain's annual electricity demand, enough renewable energy to power over 7 million British homes.

The period of public consultation runs from Wednesday 23rd November 2022 until Wednesday 14th December 2022. All responses will be considered ahead of the submission of a full planning application to the Local Planning Authority in early 2023.

The Public Information Days are open to all and are being held on:

Wednesday 23rd November 2022 from 12.30pm to 8.00pm at Huntshaw Parish Hall, Huntshaw, Devon, EX38 7HH

Thursday 24th November 2022 from 12.30pm to 8.00pm at Caddsdow Business Support Centre, Caddsdow Industrial Park, Clovelly Road, Bideford, Devon, EX39 3DX



All exhibition material will also be available to view online throughout the consultation period at www.xlinks.co/devon.

Nigel Williams, Project Director, HVDC Transmission, Xlinks said: "The need for a project like ours grows by the day. Amid rising volatility in international energy markets, it promises an exclusive and near-constant supply of reliable renewable energy, free from the environmental and weather constraints of UK-based generation.

"The proposed onshore works in Devon represent a vital part of the plan and we're very much looking forward to discussing them. This consultation will help ensure we have the fullest understanding of how to minimise disruption during construction, and how we can be a good neighbour to the local community and the natural environment. We will also explore all opportunities to contribute to social and economic development in Devon."

Ends

Notes to Editors

About Xlinks

Xlinks exists to capture the power of nature to generate a near constant, low-cost energy supply and connect it to the point of consumption in real time.

The Xlinks Morocco-UK Power Project will be a new electricity generation facility entirely powered by solar and wind energy combined with a battery storage facility. Located in Morocco's renewable energy rich region of Guelmim Oued Noun, it will be connected exclusively to Great Britain via 3,800km HVDC sub-sea cables.

Alongside the consistent output from its solar panels and wind turbines, an onsite 20GWh/5GW battery facility will provide sufficient storage to reliably deliver each and every day, a dedicated, near-constant source of flexible and predictable clean energy for Britain, designed to complement the renewable energy already generated across the UK.

For more information, visit www.xlinks.co/devon.

For more details, please contact press@xlinks.co or abby@xlinks.co.

1.3 Exhibition boards

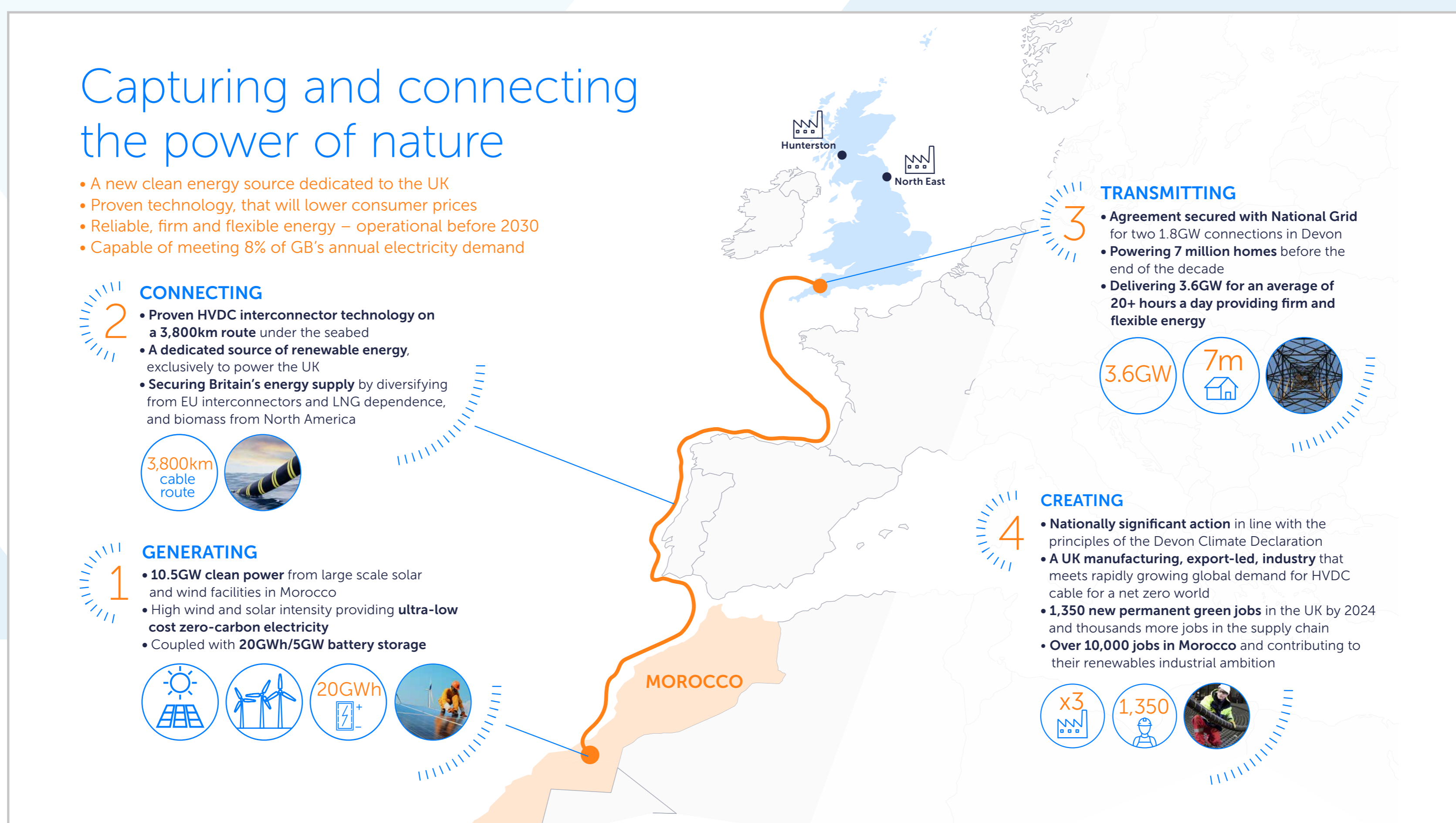
These are inserted overleaf.

Welcome to our public exhibition on Xlinks' Devon Project, a vital part of the plan to deliver a reliable source of low-cost renewable power from Morocco to the GB electricity grid, free from the environmental and weather constraints holding back UK-based generation.

The planning application will seek to gain consent for:

- Approximately 14.7km of underground High Voltage Direct Current (HVDC) cabling, from landfall at Cornborough.
- Construction of a HVDC to HVAC Converter Station site to the southwest of the existing National Grid substation located between Gammaton and Alverdiscott.

THE XLINKS MOROCCO-UK POWER PROJECT



WHY CONNECT TO THE GB ELECTRICITY GRID IN DEVON?

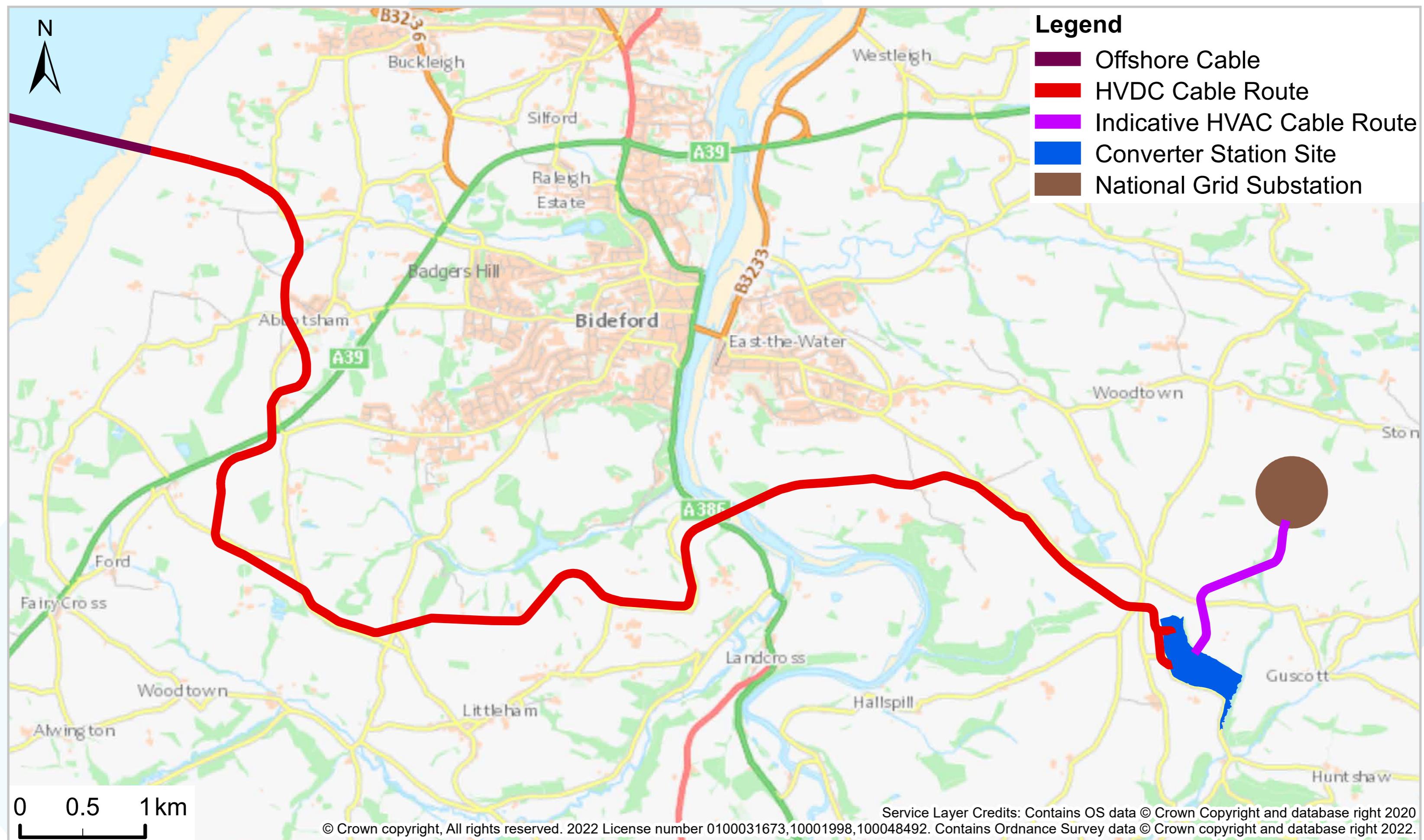
- The project needs to connect at the optimal location in terms of transmission capacity and efficiency.
- This means it can deliver more renewable energy at a lower cost to Britain's households.
- Working with National Grid, the optimal connection site has been identified as the substation located between Gammaton and Alverdiscott.
- Agreement has been reached with National Grid for two 1.8GW connections at this site.

WHO IS XLINKS?

- A private business, headquartered in the UK.
- A team combining FTSE100 and power industry leadership with British entrepreneurship.
- Driven by an ambition to change the way we think about the low carbon energy transition.
- Our team includes technical and project leads that delivered the North Sea Link, which became operational in Oct 2021 and is currently the world's longest subsea interconnector.

OUR PROPOSALS

UNDERGROUND HVDC CABLE ROUTE



Four HVDC cables will be installed underground for c.14.7km along the same route between the proposed landfall and converter station site.

Once the installation of the underground HVDC cables is complete, the land will be reinstated to its previous use and condition. There will be no permanent infrastructure above ground along the Xlinks HVDC cable route.

Selection of the HVDC cable route

We have sought to select an underground cable route that causes minimum disruption to local communities, ecology and the environment.

In selecting our preferred route corridor, we have taken into account:

- Early feedback from local stakeholders
- Environmental effects
- Project engineering requirements
- Construction requirements
- Land ownership and land use
- Cost

OUR PROPOSALS

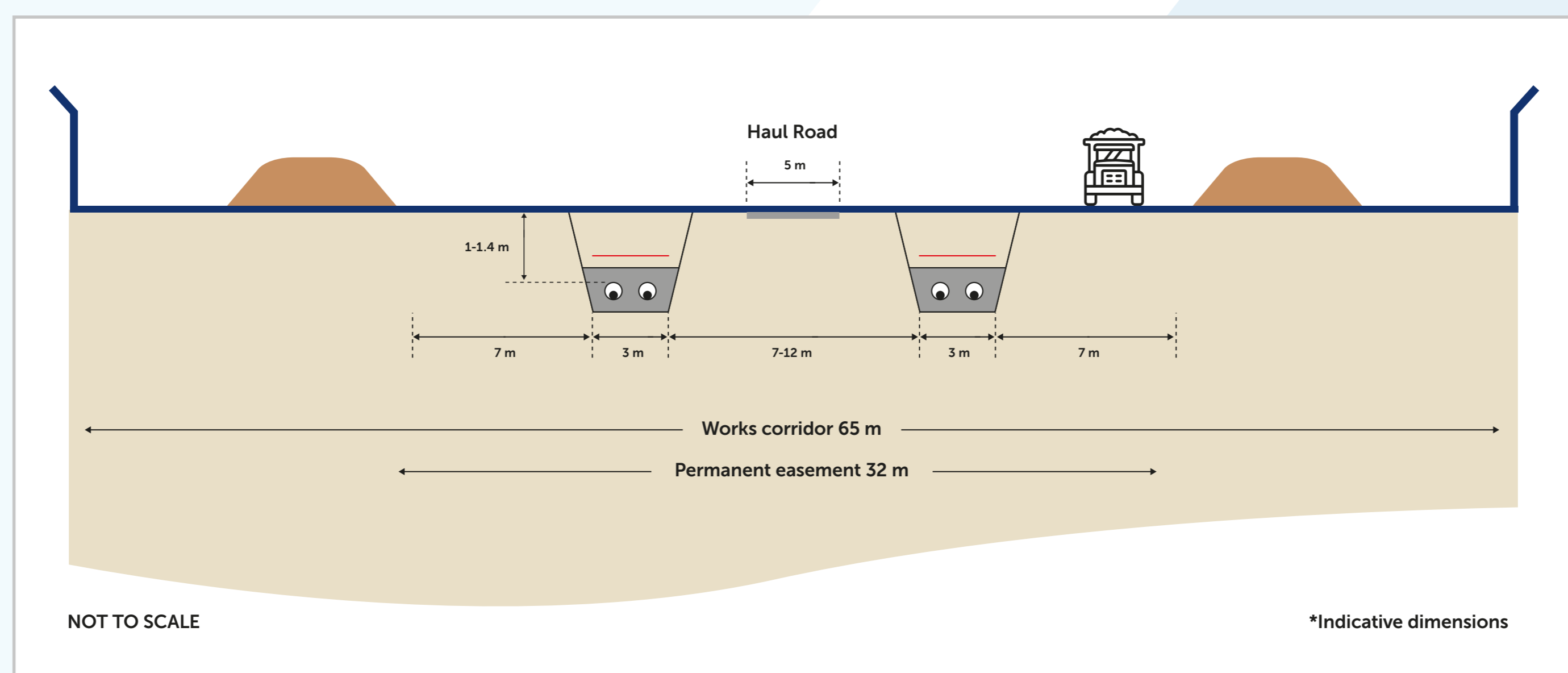
HVDC cable construction area

The project needs to acquire a permanent corridor of land approximately 32m in width for the HVDC cable route. Temporary construction compounds will also be created along the cable route.

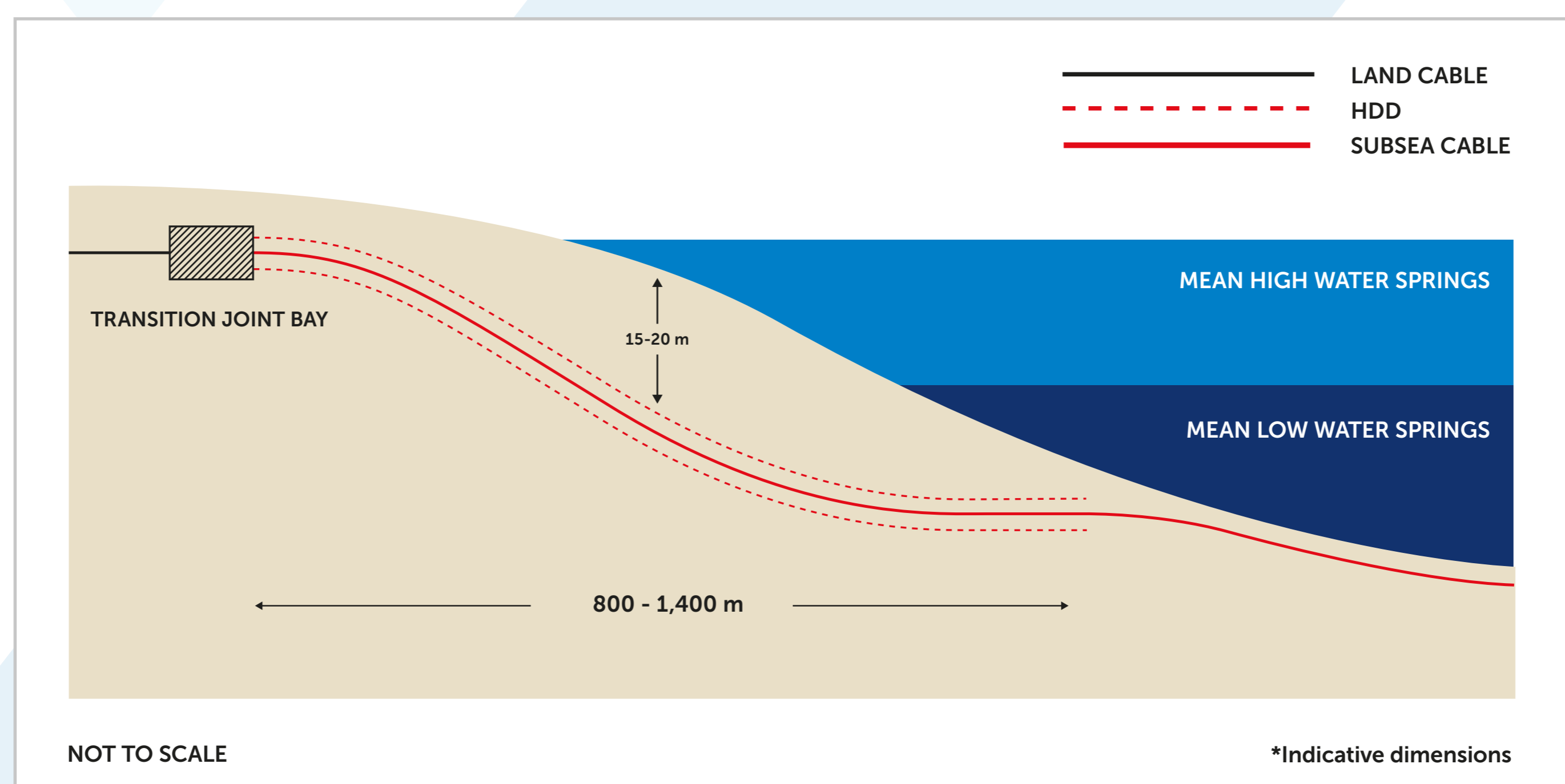
The temporary construction 'working width' along the route will be up to 65m wide in places but will be narrower at road crossings and sensitive locations.

A Construction Environmental Management Plan (CEMP) will be agreed with Torridge District Council which will outline how the construction works will avoid, minimise or mitigate effects on the environment and surrounding area.

Typical haul road swathe for two bipoles (DC)



Landfall at Cornborough



- We conducted an extensive assessment of the seabed and potential landfall sites along the North Devon coast to identify a preferred landfall site at Cornborough.
- To protect the sensitive coastal environment, small bore holes will be drilled from land behind the beach underneath the nearshore to ~800m into the sea. Ducts will be inserted, and the subsea cables pulled through these from the sea back under the beach to the shore.
- The subsea cables will connect to the onshore cable route with a joint pit. There will be no permanent infrastructure above ground.
- The offshore cable route will be subject to a separate permitting process and is not included within this consultation for the Xlinks onshore works.

OUR PROPOSALS

CONVERTER STATION SITE

Two converter stations convert electricity from direct current (efficient over long distances) to alternating current (used in homes and businesses).

- DC Yard
- Valve cooling
- Valve and reactor building
- Car Park
- Access Control building
- Transformers
- AC Yard
- Spare parts and Control building
- Temporary contractor laydown area
- Spare transformer



Satellite view

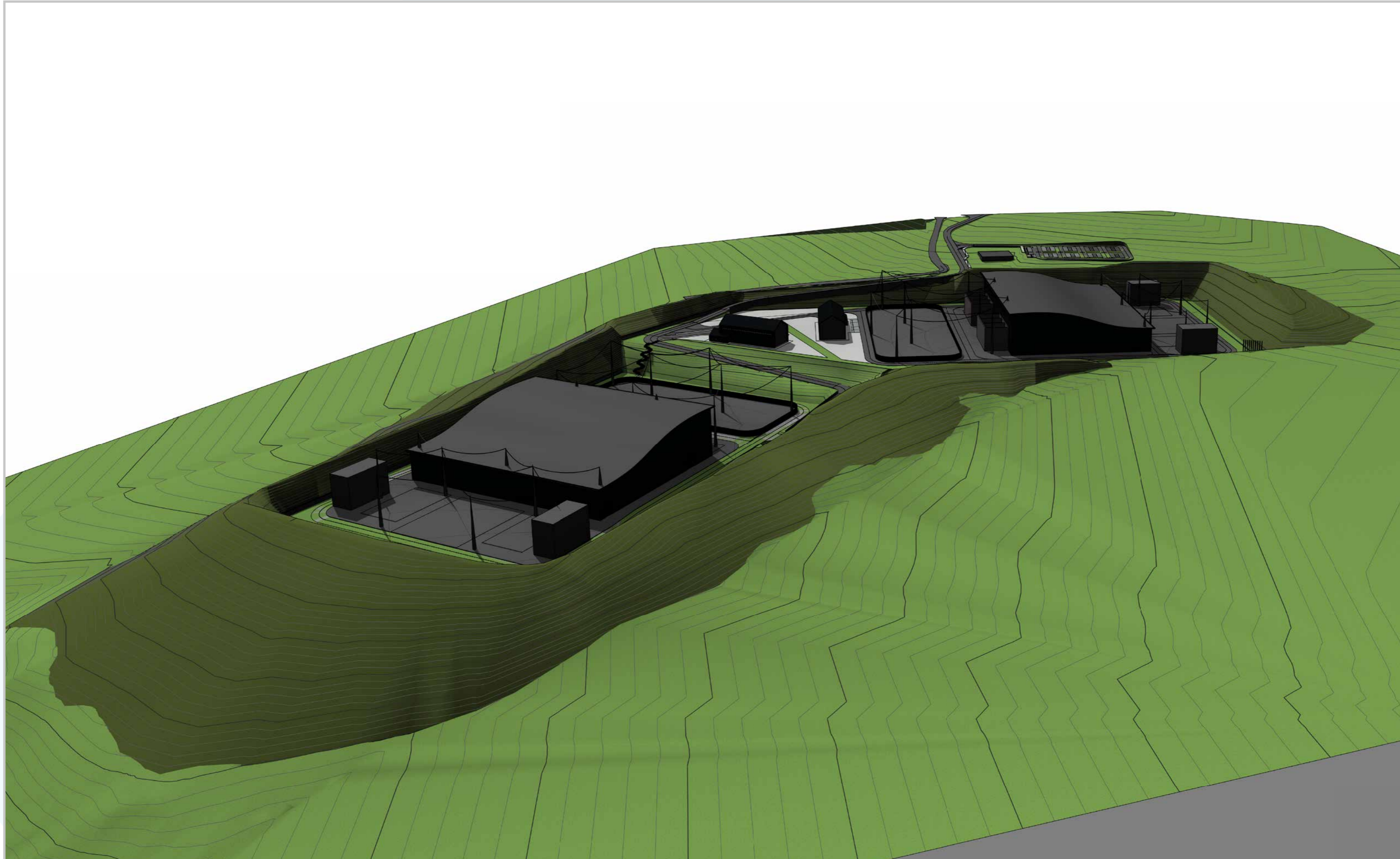
The proposed UK converter station site is located to the southwest of the existing National Grid Substation. This will contain two converter stations, one to serve each of the two 1.8GW connections to the GB electricity grid.

Its total area of development is approximately 22 hectares, approximately 2 hectares of which accounts for the footprint of the converter station buildings.

The chosen site slopes significantly and our proposed construction methodology nestles the buildings into this topography, with additional banking and screening offering opportunities for biodiversity enhancement. Approximately 74% (88% with architectural screening) of the buildings will be screened from surrounding view.

OUR PROPOSALS

CONVERTER STATION SITE



Two converter stations convert electricity from direct current (efficient over long distances) to alternating current (used in homes and businesses).

The converter stations have been designed to minimise their impact on the landscape.

Aerial view

Selection of the converter station site location

- A search area of approx. 10 km² was based principally on the area immediately surrounding the existing National Grid Substation where the project will connect to the GB electricity grid.
- Potential locations were considered having regard to a number of factors including engineering, environmental impacts, landscape, access, land availability and cost.

Underground high voltage alternating cable route

The converter station site will be connected to National Grid Substation via 12 HVAC underground cables. National Grid is currently considering how it will connect Xlinks' project to the GB electricity grid. It is therefore not yet possible to determine a precise underground route for the HVAC cables. Xlinks will continue to work with National Grid over the coming months to jointly develop a coordinated plan for this connection.

OUR PROPOSALS

PROTECTING THE ENVIRONMENT

The Environmental Impact Assessment process and how it will inform the development of the proposals.

For proposed projects such as the Xlinks' Devon Project, we are required to undertake an Environmental Impact Assessment (EIA) and produce an Environmental Statement (ES), which will be submitted as part of the planning application.

A full range of environmental studies are being conducted to inform the preferred route, access, installation and temporary construction methods.

Our plans have been developed against a priority objective to deliver a net positive environmental impact for regional biodiversity.



ECOLOGY

Ensuring that our proposals do not have a detrimental impact to local wildlife and habitats is a key priority for the project. As such, we have been working hard to identify a number of measures to mitigate any issues and provide improvements wherever possible. These will be identified in detail in our Ecological Management Plan, which will be submitted as part of the planning application.

We are working to map and assess all habitats for ecological value and potential to support protected or otherwise important species.

Detailed surveys undertaken include:

- Dormice
- Bats
- Otters
- Water voles
- Badgers
- Breeding birds
- Wintering and migratory birds
- Reptiles
- Aquatic invertebrates



OUR PROPOSALS

PROTECTING THE ENVIRONMENT



LANDSCAPE AND VISUAL IMPACT

A Landscape and Visual Impact Assessment (LVIA) has been conducted to assess the effects of our proposals on both landscape character and the views from publicly accessible locations. This includes a computer-generated Zone of Theoretical Visibility (ZTV) around the converter station site to give an indication of how much of the converter station buildings can be seen and which character areas might be affected.

Representative viewpoints were chosen at publicly accessible locations from a variety of distances and geographical locations, to determine the degree of visibility.



BEFORE

Viewpoint 2b: This viewpoint is located approximately 390 metres north up the road from Huxhill and right into the lane towards the proposed converter site. This viewpoint looks in an easterly direction towards the proposed converter site.



AFTER



BEFORE

Viewpoint 16: This viewpoint is located 450 metres to the south west from Guscott Lane, towards Thornpark Copse. The viewpoint looks in a north west direction towards the proposed converter site.



AFTER

OUR PROPOSALS

PROTECTING THE ENVIRONMENT



TRANSPORT ROUTES

During construction, HGVs will transport materials to the cable route and to the converter station site using the A39 wherever possible. HGVs are not expected to travel through Bideford.

Some local roads will need to be used to reach some parts of the cable route. If necessary, traffic management measures will be adopted along local roads, to maintain road safety and access for existing users.

Some large components, classed as abnormal loads, will need to be delivered to the converter station site during construction. We are working with Devon County Council to identify the most appropriate transportation routes, including potential off-road haul routes which could minimise use of the local road network and avoid constrained areas.



HERITAGE

All project locations have been selected in order to avoid direct impacts on any designated heritage assets such as listed buildings and scheduled monuments. Indirect impacts such as visibility will be minimised through sympathetic landscaping and tree planting programmes.

A programme of geophysical surveys is ongoing to identify the presence and extent of archaeological remains within all of the works areas, and will be followed by a programme of investigations via trial trenches.



NOISE

Noise emissions during construction will be managed through the Construction Environment Management Plan (CEMP) which will be agreed with Torridge District Council. It will outline how the construction works will avoid, minimise or mitigate effects on the environment and surrounding area.

Noise levels post construction will be minimal. There will be no permanent infrastructure above ground along the HVDC cable route. At the converter station site there will be very few moving parts and noise levels will be kept within the relevant statutory limits.



ONGOING OPERATIONS

Once operational, there will be a small team based at the converter station site. Occasional inspections and maintenance would be conducted at the converter station site and along the HVDC cable route.



OUR PROPOSALS



OUR COMMITMENT

We are committed to engaging fully and thoroughly with the Devon community.

1. As a major piece of energy infrastructure, we recognise that the project's construction will give rise to a degree of disruption to local communities. We will engage with local stakeholders to ensure that we have the fullest understanding of how to minimise disruption during construction.
2. We will explore all opportunities to contribute to the social and economic development of the local Devon community.
3. It is our priority to be a good neighbour to Devon's communities and natural environment.



LISTENING TO YOU

Today, and through the course of this consultation, we're especially keen to hear your views including:

1. Comments, questions or concerns relating to our proposals.
2. Ways in which components, materials, work packages and services can be tendered and sourced locally.
3. Options we should consider to achieve a net positive impact on biodiversity.
4. Ways in which a community benefit fund might be structured, and examples of local projects that could take advantage of such a scheme.



GET IN TOUCH

Thank you for taking the time to visit us today. You can send us your thoughts via any of the channels listed below:

Feedback form – available today and online at www.xlinks.co/devon. We will also post hard copies upon request.

Email – written feedback can be sent to hello@xlinks.co

Post – written feedback can also be posted to Xlinks Ltd, Kingfisher House, 1 Radford Way, Billericay, CM12 0EQ

Phone – register your views or request a call back from the team by calling 01271 268830

The deadline for response to this consultation is **Tuesday 13th December 2022**. All responses will be gratefully received and will be analysed as we refine our proposals ahead of submitting a planning application. A Statement of Community Involvement (SCI) will accompany the planning application, which will set out the methods used to consult, the views expressed and how these have been taken into account in relation to the project.

OUR PROPOSALS

INDICATIVE PROJECT TIMELINE

2021 - agreement with National Grid for connection to the GB electricity grid.



November 2022 - start of public consultation.



January 2023 – submission of planning application to Torridge District Council.



Early 2023 - commencement of tender process for work packages.



June / July 2023 – anticipated planning decision.



2025 – anticipated start of construction.

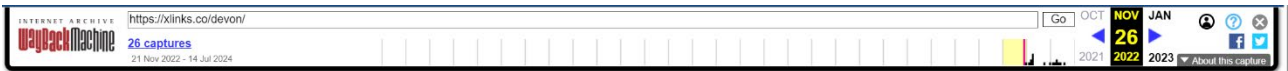


2030 – target for project completion.

All project information can be viewed at
www.xlinks.co/devon

1.4 Screenshots of website and Facebook page

1.4.1 Website



Home Morocco-UK Power Project ▾ Our Impact Who We Are News & Insights Contact

Project summary

Xlinks' Renewable Energy Development in Devon is a vital part of the plan to deliver a reliable source of low-cost renewable power from Morocco to the GB electricity grid, free from the environmental and weather constraints holding back UK-based generation.

The proposed onshore works in Devon comprise:

- Approximately 14.7km of underground High Voltage Direct Current cabling, from landfall at Cornborough.
- Construction of a HVDC to HVAC Converter Station site to the southwest of the existing National Grid substation located between Gammaton and Alverdiscott.



We're listening

We look forward to discussing our plans with local stakeholders at our public exhibition.

- **Wednesday, 23rd November 2022** from 12.30pm to 8.00pm at Huntsshaw Parish Hall, Huntsshaw, Devon, EX38 7HH
- **Thursday, 24th November 2022** from 12.30pm to 8.00pm at Caddsdow Business Support Centre, Caddsdow Industrial Park, Clovelly Road, Bideford, Devon, EX39 3DX

The drop-in exhibition marks the start of consultation with the Devon community. All information is also available to view on this website.

We are especially keen to hear your views during the course of this consultation, including:

1. Comments, questions or concerns relating to our proposals.
2. Ways in which components, materials, work packages and services can be tendered and sourced locally.
3. Options we should consider to achieve a net positive impact on biodiversity.
4. Ways in which a community benefit fund might be structured, and examples of local projects that could take advantage of such a scheme.

Frequently Asked Question

- Why connect to the GB electricity grid in Devon?** ✓
Our project needs to connect at the optimal location in terms of transmission capacity and efficiency. This means it can deliver more renewable energy at a lower cost to Britain's households.
We worked with National Grid to identify the optimal connection site. Agreement has been reached with National Grid for two 1.8GW connections at this site.
- How can Devon benefit?** ➤
- Will it impact rural views and character?** ➤
- How will lorries access the construction?** ➤

How can Devon benefit?	>
Will it impact rural views and character?	>
How will lorries access the construction?	>

Get in touch

Please send us your thoughts via any of the channels listed below:

- [Feedback form](#)
- Email – hello@xlinks.co
- Phone – [01271 268830](tel:01271268830)
- Post – Xlinks Ltd, Kingfisher House, 1 Radford Way, Billericay, CM12 0EQ

The deadline for responses to our public consultation is Tuesday 13th December 2022. All responses will be gratefully received and will be analysed as we refine our proposals ahead of submitting a planning application. A Statement of Community Involvement will accompany the planning application, and will set out the methods used to consult, the views expressed and how these have been taken into account.

Stay Updated

As a good neighbour, we want to keep you updated on Xlinks' Renewable Energy Development. [Click here to sign up](#) to receive relevant Xlinks updates and other communications.

You can also [follow us on Facebook: @xlinksdevon](#).

Further information

View the information boards from our public exhibition.

[Download here](#)

1.4.2 Facebook page

Xlinks Devon

Intro

Page · Energy company

hello@xlinks.co

xlinks.co/devon

Not yet rated (0 reviews)

Photos [See All Photos](#)

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Xlinks Devon
23 November 2022

We look forward to discussing our plans with local stakeholders at our public exhibition in Devon today and tomorrow. You can join us on:

- Wednesday, 23rd November 2022 from 12.30pm to 8.00pm at Huntshaw Parish Hall, Huntshaw, Devon, EX38 7HH
- Thursday, 24th November 2022 from 12.30pm to 8.00pm at Caddsdwn Business Support Centre, Caddsdwn Industrial Park, Clovelly Road, Bideford, Devon, EX39 3DX... [See more](#)

Xlinks

XLINKS.CO
Devon - Xlinks

2 SECOND NON-STATUTORY CONSULTATION

2.1 Letter to consultees



Our Ref:

17th April 2023

Name
Address1
Address2
Address3
Address4
Postcode

Dear

Xlinks' Renewable Energy Development in Devon – updated proposal

Xlinks Ltd intends to submit a planning application to Torridge District Council for a renewable energy project in North Devon.

The Xlinks Morocco-UK Power Project will establish a direct electricity connection from Morocco to the UK. The project will deliver 3.6GW of reliable renewable electricity (from solar and wind energy combined with battery storage) to the national grid, representing around 8% of Great Britain's annual electricity needs, enough to provide low cost, clean power to over seven million British homes from the end of the decade.

Xlinks' Renewable Energy Development in Devon is a vital part of this plan. It will seek to gain planning permission for approximately 14km of underground High Voltage Direct Current (HVDC) cabling, from landfall at Cornborough Range to a new converter station site close to the existing National Grid substation located between Gammaton and Alverdiscott.

Following feedback received from the local community and stakeholders during the first round of public consultation last year, we have made a number of key enhancements to our proposals. They include the relocation of the converter station site to the old Webbery Showground and an alternative route for the underground cable to avoid Abbotsham village.

We are holding further Public Information Days to share information about our updated plans and seek feedback from stakeholders and the local community. These are drop-in events and are being held on:

Wednesday 26th April 2023 from 12.30pm to 8.00pm
Huntshaw Parish Hall, Huntshaw, Devon, EX38 7HH

Thursday 27th April 2023 from 12.30pm to 8.00pm
Alverdiscott Community Hall, Stoney Cross, Bideford, Devon, EX39 4PZ

Wednesday 17th May 2023 from 12.30pm to 8.00pm
Caddsdow Business Support Centre, Caddsdow Industrial Park, Clovelly Road, Bideford, Devon, EX39 3DX

From **Monday 17th April 2023**, all materials being exhibited at the Public Information Days will be made available on the project website at www.xlinks.co/devon.

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Registered Office: Kingfisher House, 1 Radford Way, Billericay, CM12 0EQ
Website: xlinks.co. Email: hello@xlinks.co

Deadline for comment is **Wednesday 31st May 2023**.

You can send us your feedback via any of the channels listed below:

Feedback form – available at the Public Information Days and online at www.xlinks.co/devon. We will also post hard copies upon request

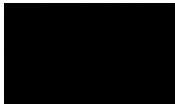
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Post – Xlinks Ltd, Kingfisher House, 1 Radford Way, Billericay, CM12 0EQ

Phone – 01271 268830

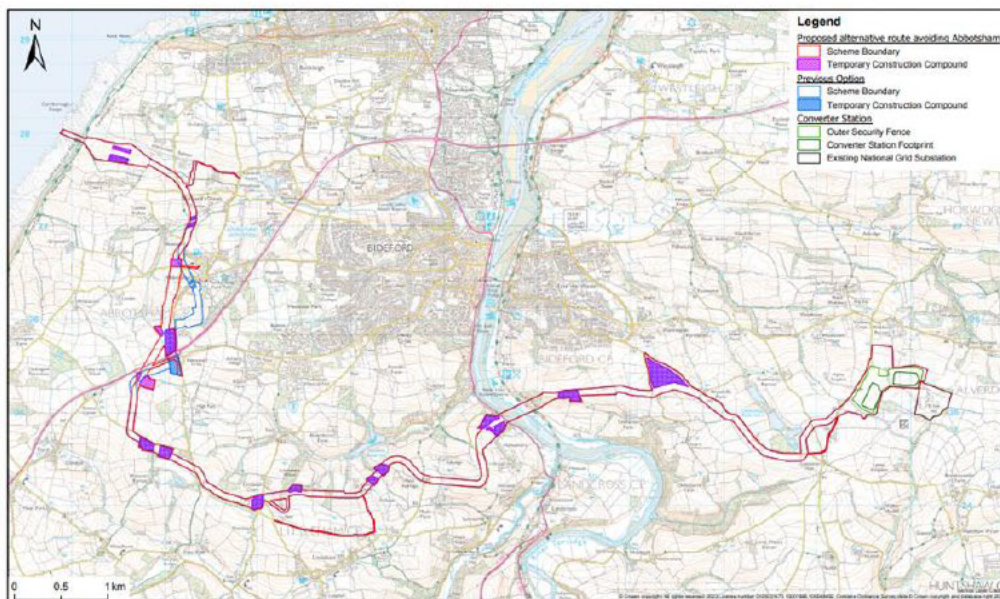
Once we have carefully considered all feedback gathered, it is our intention to submit a planning application for the project in the summer.

Yours sincerely



David Kelly
Xlinks UK Development Manager

Indicative Site Location Plan:



Xlinks Limited. Registered in England & Wales. Company Number 11891505
Registered Office: Kingfisher House, 1 Radford Way, Billericay, CM12 0EQ
Website: xlinks.co. Email: hello@xlinks.co

2.2 Press release



April 17th, 2023

XLINKS HOLDS SECOND PUBLIC CONSULTATION ON GROUND-BREAKING RENEWABLE ENERGY CONNECTION PLAN

- *Second round of public exhibitions to capture local views on proposed project enhancements.*
- *Following community feedback at first public exhibitions, project timeline was extended to enable work on enhancements.*
- *Proposals are a vital part of the Xlinks Morocco-UK Power Project, which aims to help lower consumer energy prices, bolster national energy security, and meet decarbonisation targets.*

Xlinks, a private renewable energy company headquartered in the UK, today begins a second period of public consultation in Devon regarding its plans to connect 3.6GW of reliable renewable energy from Morocco to the GB electricity grid.

Xlinks' Renewable Energy Development in Devon will seek to gain planning permission for 14km of underground High Voltage Direct Current (HVDC) cabling, from landfall at Cornborough Range, and construction of a HVDC to High Voltage Alternating Current (HVAC) converter station site in close proximity to the existing National Grid substation located between Gammaton and Alverdiscott.

Having worked with National Grid to identify the optimal location to connect to the GB electricity grid, Xlinks has developed its plans in line with the rural character of North Devon. All cables will be installed underground, with land reinstated to its previous use. There will be no permanent infrastructure above-ground along the route.

Upon completion, the Xlinks Morocco-UK Power Project will be capable of meeting approximately 8% of Britain's annual electricity demand, enough renewable energy to power over 7 million British homes.

Xlinks' second round of public exhibitions in Devon seeks local views on the project enhancements being proposed following community feedback at its first public exhibitions held last year.

Firstly, the company proposes to relocate the converter station site to the old Webbery Showground. This site is closer to the existing National Grid substation and less disruptive to local residents, particularly during construction. Work is being undertaken to ensure that the site is also less visually intrusive and substantially screened from view.



Secondly, the company proposes an alternative route for the underground cable to avoid Abbotsham village. This takes the underground cable away from homes and schools.

Finally, further detail has been made available regarding the proposed construction methods and transport routes employed by the project. These align with the company's intention to minimise potential disruption during construction, including on local roads.

The second period of public consultation runs from Monday 17th April 2023 until Wednesday 31st May 2023. All responses will be considered ahead of the submission of a full planning application to the Local Planning Authority in summer 2023.

The drop-in public exhibitions are open to all and are being held on:

Wednesday 26th April 2023 from 12.30pm to 8.00pm at Huntshaw Parish Hall, Huntshaw, Devon, EX38 7HH

Thursday 27th April 2023 from 12.30pm to 8.00pm at Alverdiscott Community Hall, Stoney Cross, Bideford, Devon, EX39 4PZ

Wednesday 17th May 2023 from 12.30pm to 8.00pm at Caddsdow Business Support Centre, Caddsdow Industrial Park, Clovelly Road, Bideford, Devon, EX39 3DX

All exhibition material is also available to view online throughout the consultation period at www.xlinks.co/devon.

Nigel Williams, Project Director, HVDC Transmission, Xlinks said: "From day one of our work in Devon, we recognised the need for local input to help us shape our plans, minimise potential disruption during construction, and maximise benefit to the region.

"We were delighted that our first public exhibitions were so well attended and extended our project timeline to carefully consider, and then act upon, feedback from the local community. Consequently, we've made some key enhancements to our project proposals and look forward to discussing these at our second public exhibitions and throughout the course of this second round of public consultation.

"While our project can make a real difference to UK energy security and the pursuit of national decarbonisation targets, we consider it equally important to be a good neighbour to the local community and the natural environment, and to explore all opportunities to contribute to social and economic development in Devon."

Ends

2.3 Exhibition boards

These are inserted overleaf.

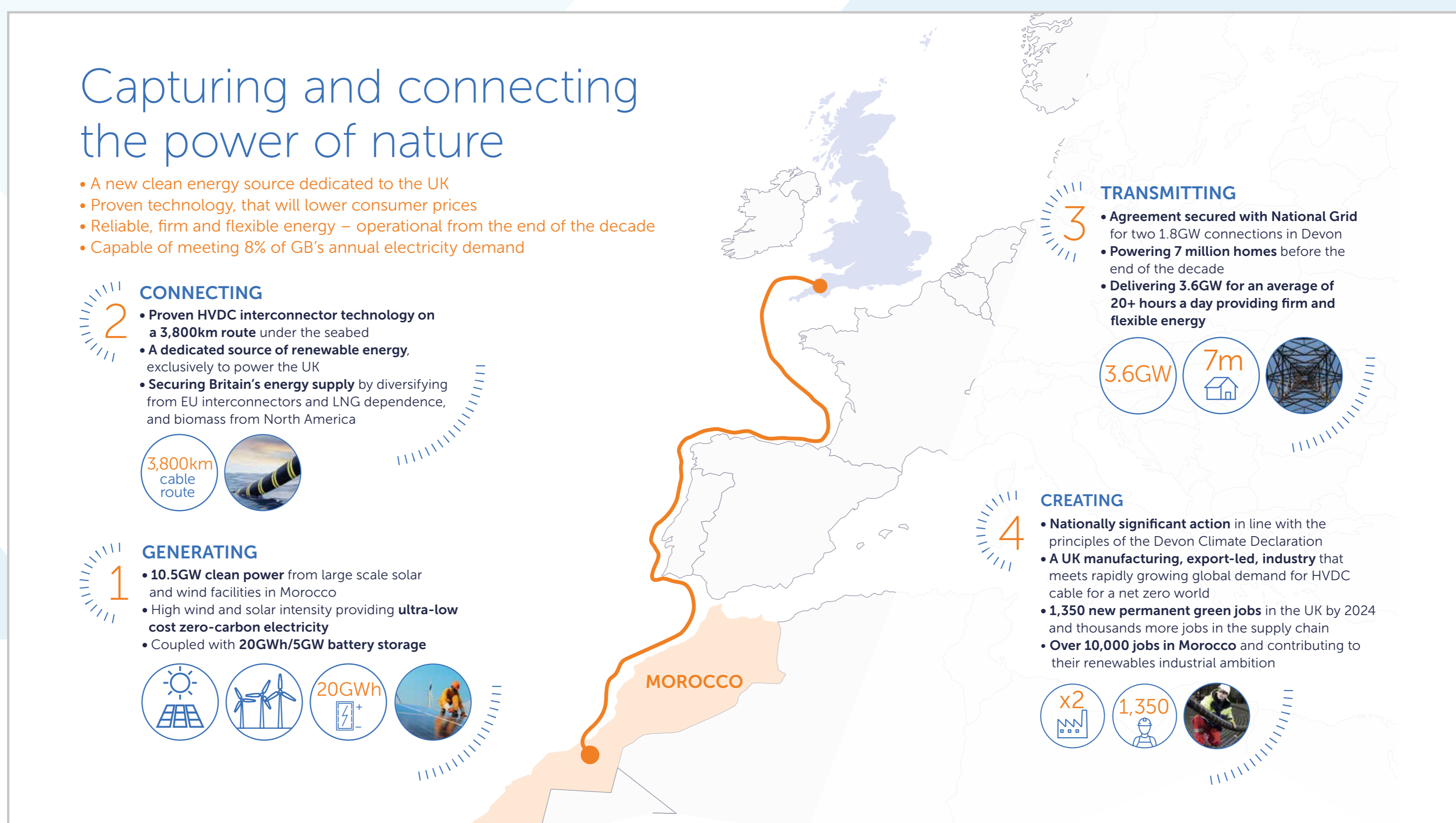
Welcome to our second round of public exhibitions on the Xlinks' Renewable Energy Development in Devon.

- A vital part of the plan to deliver reliable and low-cost renewable power from Morocco to the GB electricity grid.
- Free from the environmental and weather constraints holding back UK-based generation.

The planning application will seek to gain permission for:

- Approximately 14km of underground High Voltage Direct Current (HVDC) cabling, from landfall at Cornborough Range.
- Construction of a HVDC to HVAC Converter Station site in close proximity (to the west) of the existing National Grid substation located between Gammaton and Alverdiscott.

THE XLINKS MOROCCO-UK POWER PROJECT



WHY CONNECT TO THE GB ELECTRICITY GRID IN DEVON?

- The project needs to connect at the optimal location in terms of transmission capacity and efficiency.
- This means it can deliver more renewable energy at a lower cost to Britain's households.
- Working with National Grid, the optimal connection site has been identified as the substation located between Gammaton and Alverdiscott.
- Agreement has been reached with National Grid for two 1.8GW connections at this site.

WHO IS XLINKS?

- A private business, headquartered in the UK.
- A team combining FTSE100 and power industry leadership with British entrepreneurship.
- Driven by an ambition to change the way we think about the low carbon energy transition.
- Our team includes technical and project leads that delivered the North Sea Link, which became operational in Oct 2021 and is currently the world's longest subsea interconnector.

What's changed?

Following feedback from the local community at our first public consultation, we extended our project timeline and worked to enhance our proposals.



THREE KEY ENHANCEMENTS TO OUR PROPOSALS

You said

Proposed enhancement

1

- There is a better, less disruptive and visually intrusive, location for the converter station site.

- ✓ Converter station site relocated to the old Webbery Showground, closer to the National Grid substation and substantially screened.

2

- The underground cable runs too close to homes and schools in Abbotsham.

- ✓ Alternative underground cable route avoids Abbotsham village.

3

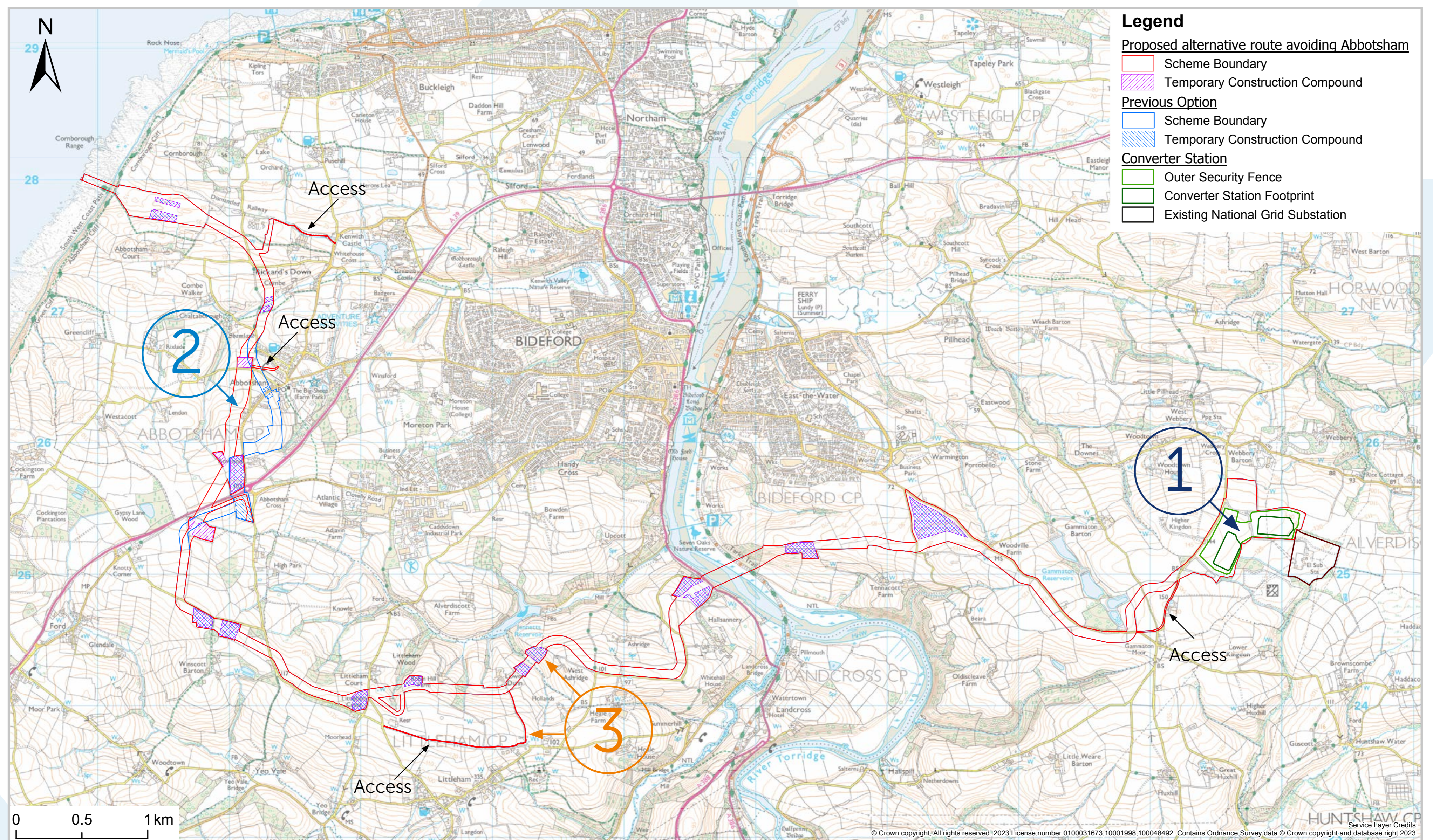
- We need more detail on the construction plans and are particularly concerned about potential road closures and the volume of traffic on local roads.

- ✓ Further detail available on construction methods. Updated transport routes employ temporary haul roads and marine delivery to minimise disruption on local roads.

You can read more about these proposed enhancements at today's public exhibition. Our team would be delighted to discuss these plans with you.

OUR PROPOSALS

PROJECT BOUNDARY



Four HVDC cables will be installed underground for approximately 14km along a single corridor between the proposed landfall and converter station site.

Once the installation of the underground HVDC cables is complete, the land will be reinstated to its previous use and condition. There will be no permanent infrastructure above ground along the Xlinks HVDC cable route.

Selection of the HVDC cable route

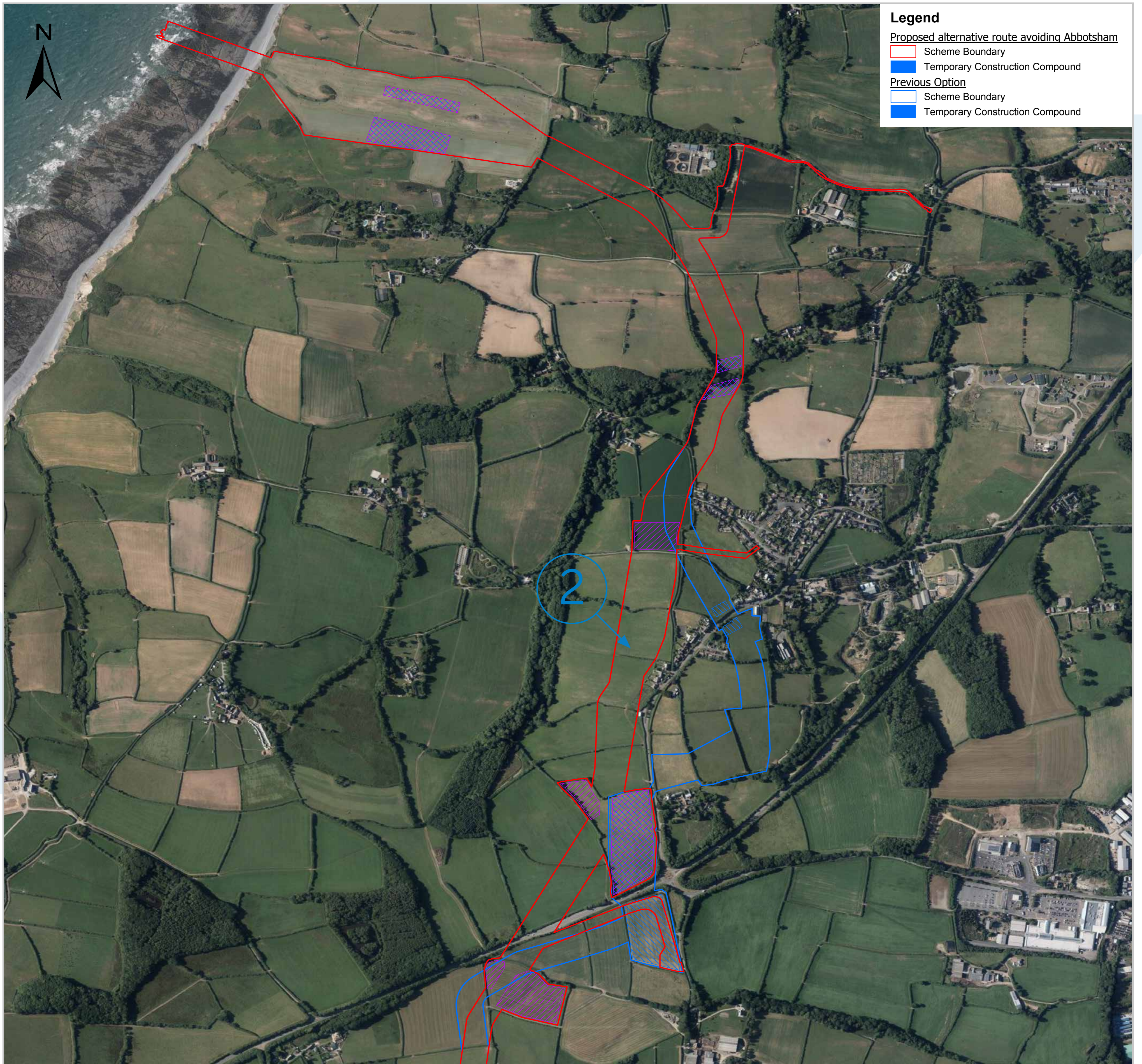
We have sought to select an underground cable route that causes minimum disruption to local communities, ecology and the environment.

In selecting our preferred route corridor, we have taken into account:

- Early feedback from local stakeholders
- Community feedback from our first round of consultation
- Environmental effects
- Project engineering requirements
- Construction requirements
- Land ownership and land use

OUR PROPOSALS

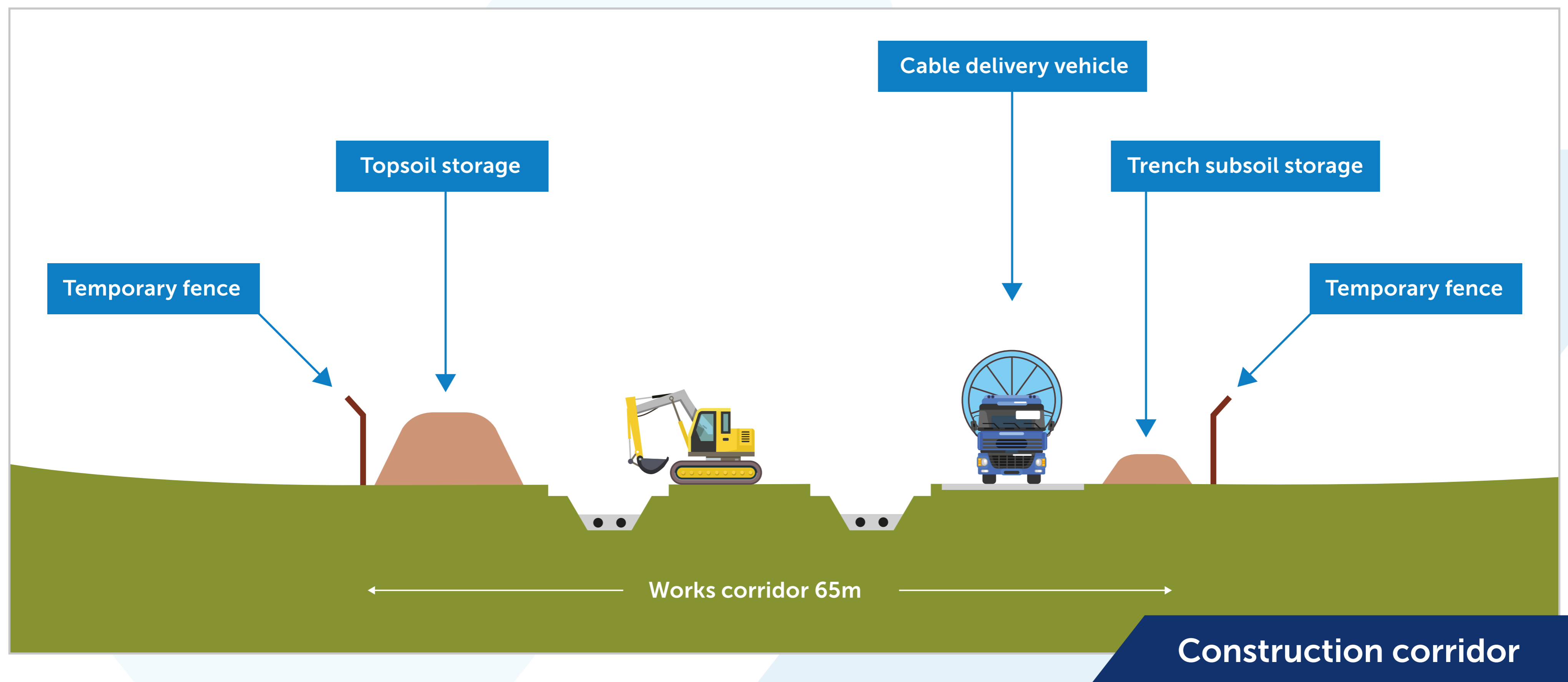
ALTERNATIVE UNDERGROUND CABLE ROUTE AT ABBOTSHAM



- The alternative underground cable route passes to the west of Abbotsham and continues on the western side of the road which runs north of Abbotsham Cross roundabout, before turning to cross underneath the A39.
- Route does not run close to homes or schools and is outside the area designated for future development in the Local Plan.
- Route further reduces the use of public highways by construction traffic and reduces the environmental impact from hedge crossings.

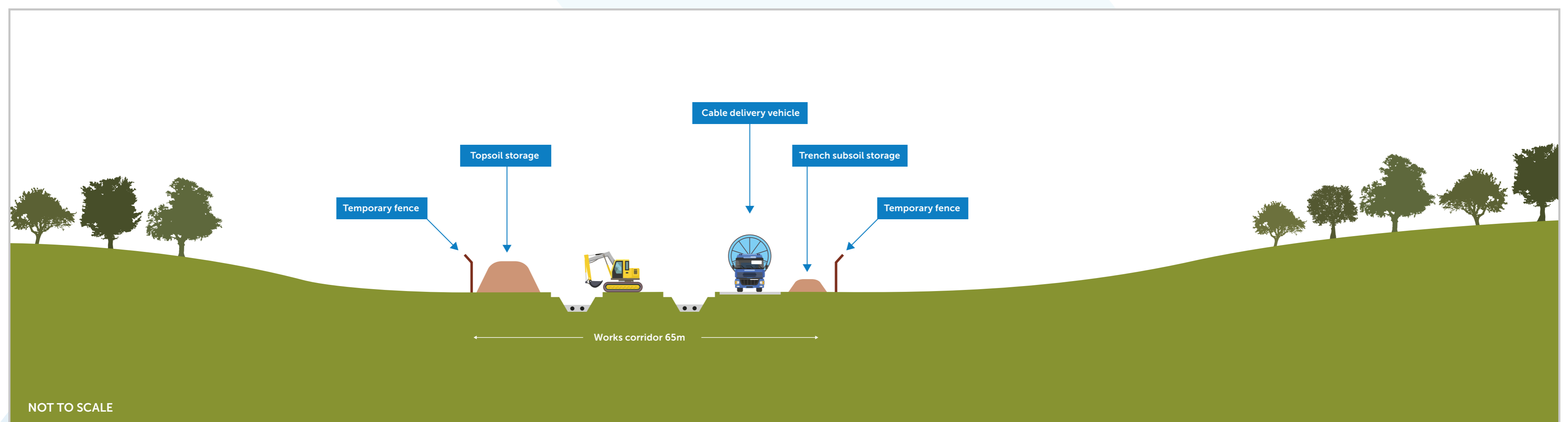
OUR PROPOSALS

CONSTRUCTION METHODS ALONG THE UNDERGROUND CABLE ROUTE



Construction sequence

- Fence off the 65m cable route construction corridor in sections
- Carefully strip back top soil and store it on one side of the construction corridor
- Construct the haul road
- Dig the cable trenches and joint bays storing excavated material, separately from the topsoil, on the opposite side of the construction corridor
- Place ducts into the trenches, surrounding them with thermally efficient sand based material, and backfill the trenches with the original subsoil
- Cable drums delivered to site
- Pull the cable through the ducts (each approx. 1km long) and connect at the joint bays
- Fill and cover the joint bays in the same way as the cable trenches
- Carefully replace the topsoil over the whole construction corridor once the cable has been tested
- Reinststate drainage and haul road and return the land to its previous use



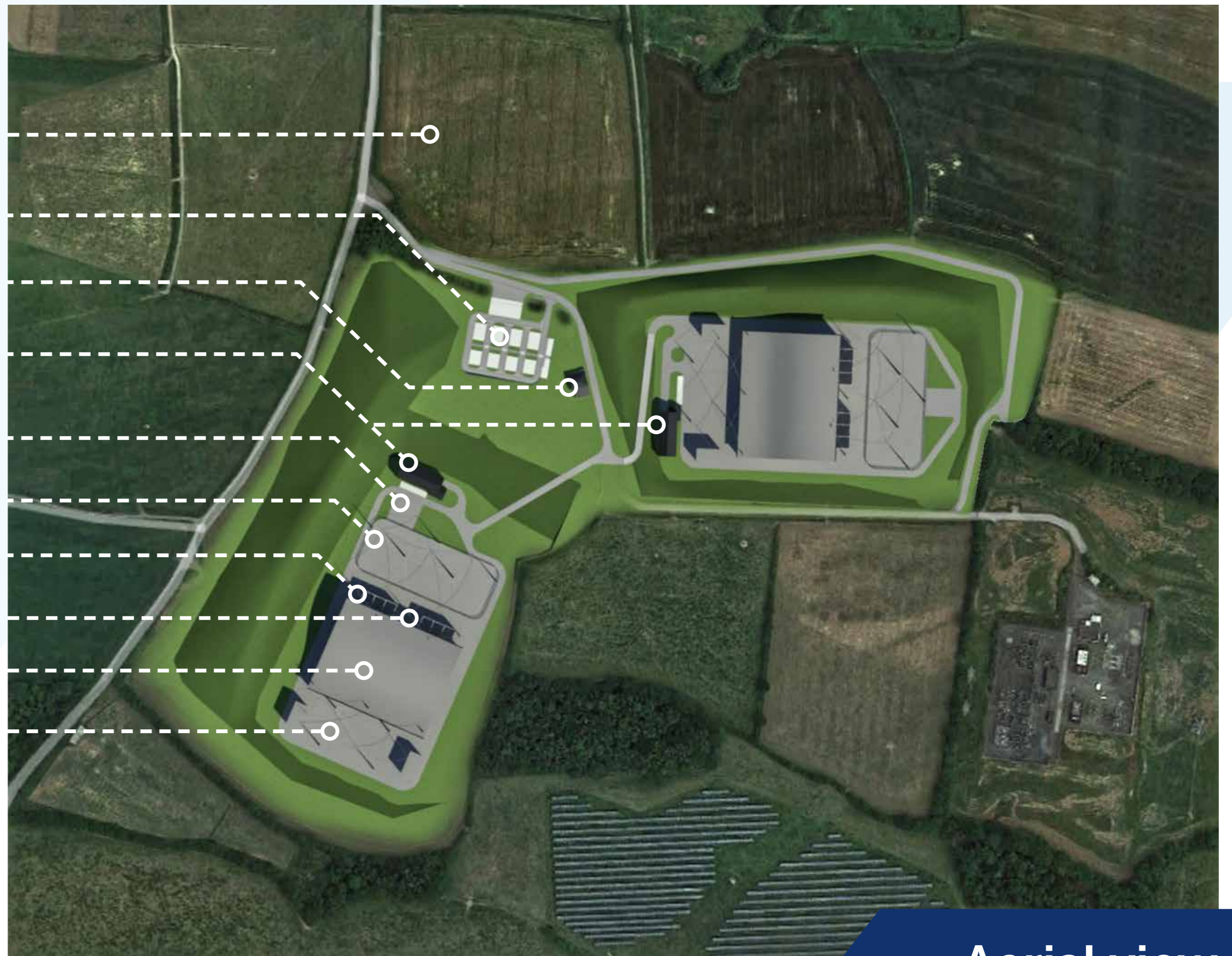
- DC cable route expected to be constructed over a period of 2 years
- Construction activity is transitory in most places
- Permanent easement reduces to 32m

OUR PROPOSALS

NEW CONVERTER STATION SITE

Two converter stations convert electricity from direct current (efficient over long distances) to alternating current (used in homes and businesses).

- Temporary contractor laydown area
- Main car park
- Control access building
- Spare parts and control building
- Harmonic filter
- AC Yard
- Spare transformer
- Transformers
- Valve and reactor building
- DC Yard



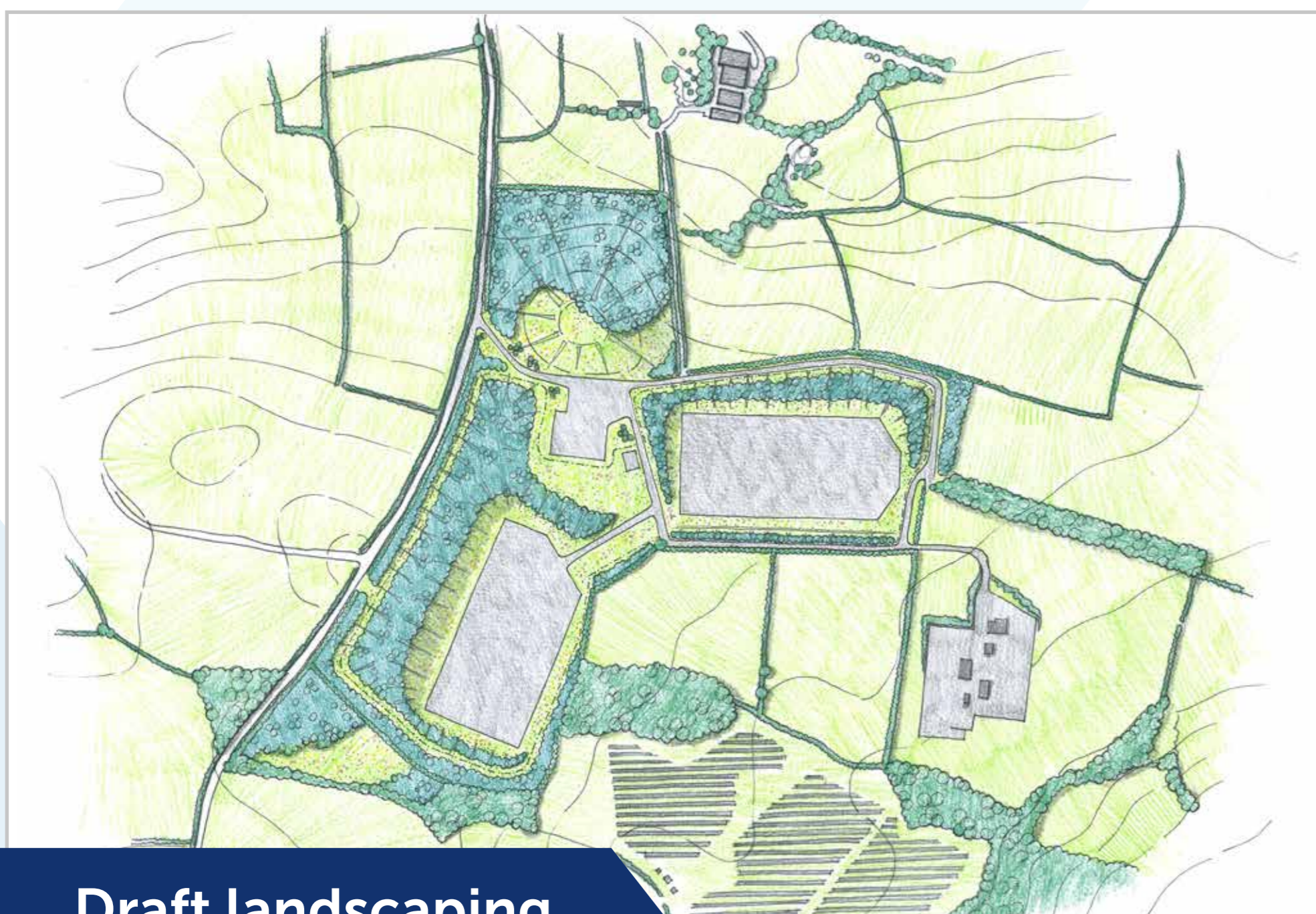
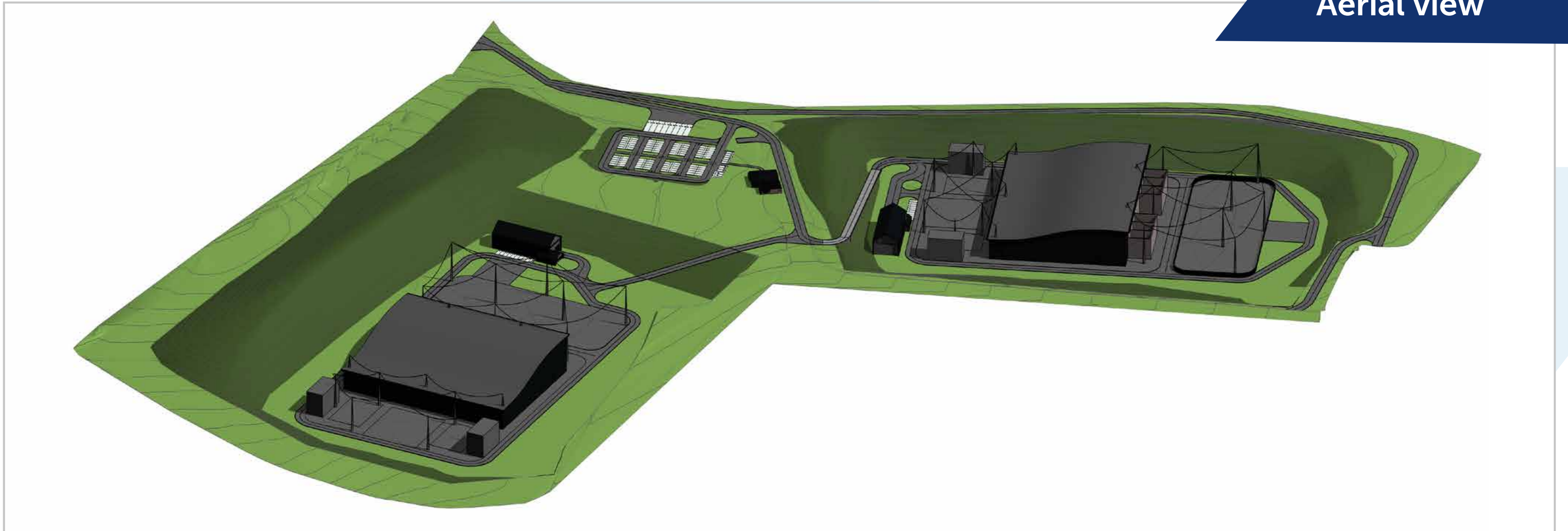
Aerial view

- The proposed converter station site at the old Webbery Showground is immediately west of National Grid's existing Alverdiscott substation.
- The site will include two converter stations, one to serve each of the two 1.8GW connections to the GB electricity grid.
- The total area of development is approximately 27.6 hectares of which 6.9 hectares accounts for the footprint of the converter station and other buildings.
- The site slopes gently downwards towards the east and south east.
- Our proposed construction methodology nestles the buildings into this topography, with additional banking to screen the site from views from the north and the AONB to the west.
- The landscaping scheme will also offer opportunities for biodiversity enhancement on the site.
- The converter station site will be connected to National Grid substation via 12 HVAC underground cables.

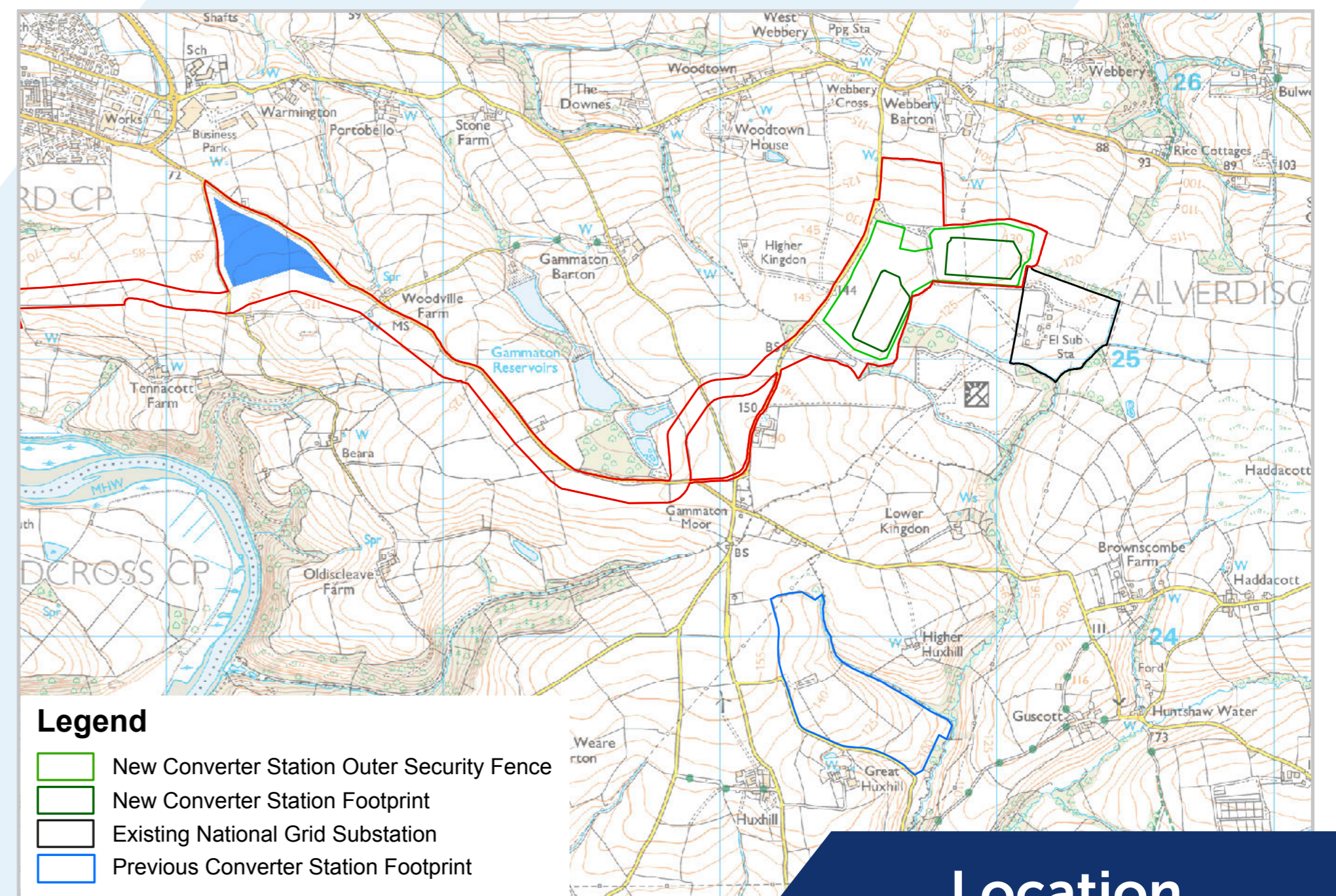
OUR PROPOSALS

NEW CONVERTER STATION SITE

Aerial view



Draft landscaping



Location

The converter stations are still in the design process which will seek to minimise their impact on the landscape.

We would welcome your feedback on these plans.

Selection of the converter station site location

Following community feedback and further engineering evaluation, Xlinks has decided to relocate its proposed converter stations closer to the existing National Grid substation.

Factors affecting site selection include:

- Reducing the number of properties impacted by construction and associated traffic
- Reducing the number of properties affected by visual impact
- Concentrating grid and energy infrastructure in one place

OUR PROPOSALS

LANDSCAPE AND VISUAL IMPACT

A Landscape and Visual Impact Assessment (LVIA) is being conducted to assess the effects of our proposals on both landscape character and views from publicly accessible locations. This includes a computer-generated Zone of Theoretical Visibility (ZTV) around the converter station site to give an indication of how much of the converter station buildings could be seen and which landscape character areas might be affected.

Representative viewpoints were chosen at publicly accessible locations from a variety of distances and geographical locations, to determine the degree of visibility. These viewpoints are represented as photomontages at this exhibition.

Looking South

Existing view



Proposed illustrative view



This viewpoint is located along the Public Right of Way between Mutton Hall and Ashridge, approximately 550 metres south of Horwood. The viewpoint looks in a southerly direction towards the proposed converter site.

OUR PROPOSALS

Looking North East

Existing view



Proposed illustrative view



This viewpoint is located north of Gammaton Moor. It is situated 120 metres north up the road from Moorland Cottage. The viewpoint looks in a north-easterly direction towards the proposed converter site.

Looking North

Existing view



Proposed illustrative view



This viewpoint is located along the footpath which is routed between Huntshaw and Sheddymoor Heights. It is situated approximately 240 metres east along the road from Huntshaw, left onto the public footpath, and 120 metres north east along the footpath towards Sheddymoor Heights. The viewpoint looks in a northerly direction towards the proposed converter site.

OUR PROPOSALS

Looking West

Existing view



Proposed illustrative view



This viewpoint is located adjacent to Alverdiscott, approximately 50 metres south from the junction with the B3232 and towards Abbaton. The viewpoint looks in a westerly direction towards the proposed converter site.

Looking West

Existing view



Proposed illustrative view



This viewpoint is located approximately 145 metres north east up the road from Abbaton, towards Alverdiscott. The viewpoint looks in a westerly direction towards the proposed converter site.

OUR PROPOSALS

PROTECTING THE ENVIRONMENT

The Environmental Impact Assessment process and how it will inform the development of the proposals.

For proposed projects such as this, we are required to undertake an Environmental Impact Assessment (EIA) and produce an Environmental Statement (ES), which will be submitted as part of the planning application.

A full range of environmental studies are being conducted to inform the preferred HVDC cable route, access for construction vehicles and the design of the converter station complex.

Our plans have been developed against a priority objective to deliver a net positive environmental impact for regional biodiversity.



ECOLOGY

Ensuring that our proposals do not have a detrimental impact to local wildlife and habitats is a key priority for the project. As such, we have been working hard to identify a number of measures to mitigate any issues and provide improvements wherever possible. These will be identified in detail in our Ecological Management Plan, which will be submitted as part of the planning application.

We are working to map and assess all habitats for ecological value and potential to support protected or otherwise important species.

Detailed surveys have been undertaken which have found the following general results so far:

- Dormice
- Bats
- Otters
- Water voles
- Badgers
- Amphibians
- Breeding birds
- Wintering and migratory birds
- Reptiles
- Aquatic invertebrates



OUR PROPOSALS

PROTECTING THE ENVIRONMENT



TRANSPORT

We will seek to minimise disruption to local roads during construction by:

- Transporting large, infrequent, converter station components by water to Appledore shipyard.
- Employing construction haul roads along the underground cable route to remove frequent vehicle movements from the public highway.
- Transporting materials to strategically located compounds adjacent to the A39, A386 and Gammaton Road.



NOISE

- Noise during construction will be managed through the Construction Environment Management Plan (CEMP) which will be agreed with Torridge District Council. It will outline how the construction works will avoid, minimise or mitigate effects on the environment and surrounding area.
- Noise levels post construction will be minimal. There will be no permanent infrastructure above ground along the HVDC cable route. At the converter station site there will be very few moving parts and noise levels will be kept within the relevant statutory limits.



ONGOING OPERATIONS

- Once operational, there will be a small team based at the converter station site. Occasional inspections and maintenance would be conducted at the converter station site and along the HVDC cable route.
- Outdoor lighting at the converter station site will normally be restricted to motion-activated security lighting. Most outdoor night-time activity, such as occasional deliveries, can be conducted with torchlight. Only on rare occasions, such as maintenance outages in the winter months, will it be necessary to employ any further outdoor lighting.



OUR PROPOSALS



OUR COMMITMENT

We are committed to engaging fully and thoroughly with the Devon community.

1. Our priority is to be a good neighbour to Devon's communities and natural environment.
2. As a major piece of energy infrastructure, we recognise that the project's construction will give rise to a degree of disruption to local communities. We will engage with local stakeholders to ensure that we have the fullest understanding of how to minimise disruption during construction.
3. We will explore all opportunities to contribute to the social and economic development of the local community.



LISTENING TO YOU

Today, and through the course of this consultation, we're especially keen to hear your views including:

1. Comments, questions or concerns relating to our proposals.
2. Ways in which components, materials, work packages and services can be tendered and sourced locally.
3. Options we should consider to achieve a net positive impact on biodiversity.
4. Ways in which a community benefit fund might be structured, and examples of local projects that could take advantage of such a scheme.



GET IN TOUCH

Thank you for taking the time to visit us today. You can send us your thoughts via any of the channels listed below:

Feedback form – available today and online at www.xlinks.co/devon. We will also post hard copies upon request.

Email – written feedback can be sent to hello@xlinks.co

Post – written feedback can also be posted to Xlinks Ltd, Kingfisher House, 1 Radford Way, Billericay, CM12 0EQ

Phone – register your views or request a call back from the team by calling 01271 268830

The deadline for response to this consultation is **Wednesday 31st May 2023**. All responses will be gratefully received and will be analysed as we refine our proposals ahead of submitting a planning application. A Statement of Community Involvement (SCI) will accompany the planning application, which will set out the methods used to consult, the views expressed and how these have been taken into account in relation to the project.

OUR PROPOSALS

INDICATIVE PROJECT TIMELINE

2021 – agreement with National Grid for connection to the GB electricity grid



November-December 2022 – first round of public consultation



January-March 2023 – re-design of converter station



April-May 2023 – second round of public consultation



Summer 2023 – submission of planning application to Torridge District Council



Winter 2023 – anticipated planning decision



2025 – anticipated start of construction

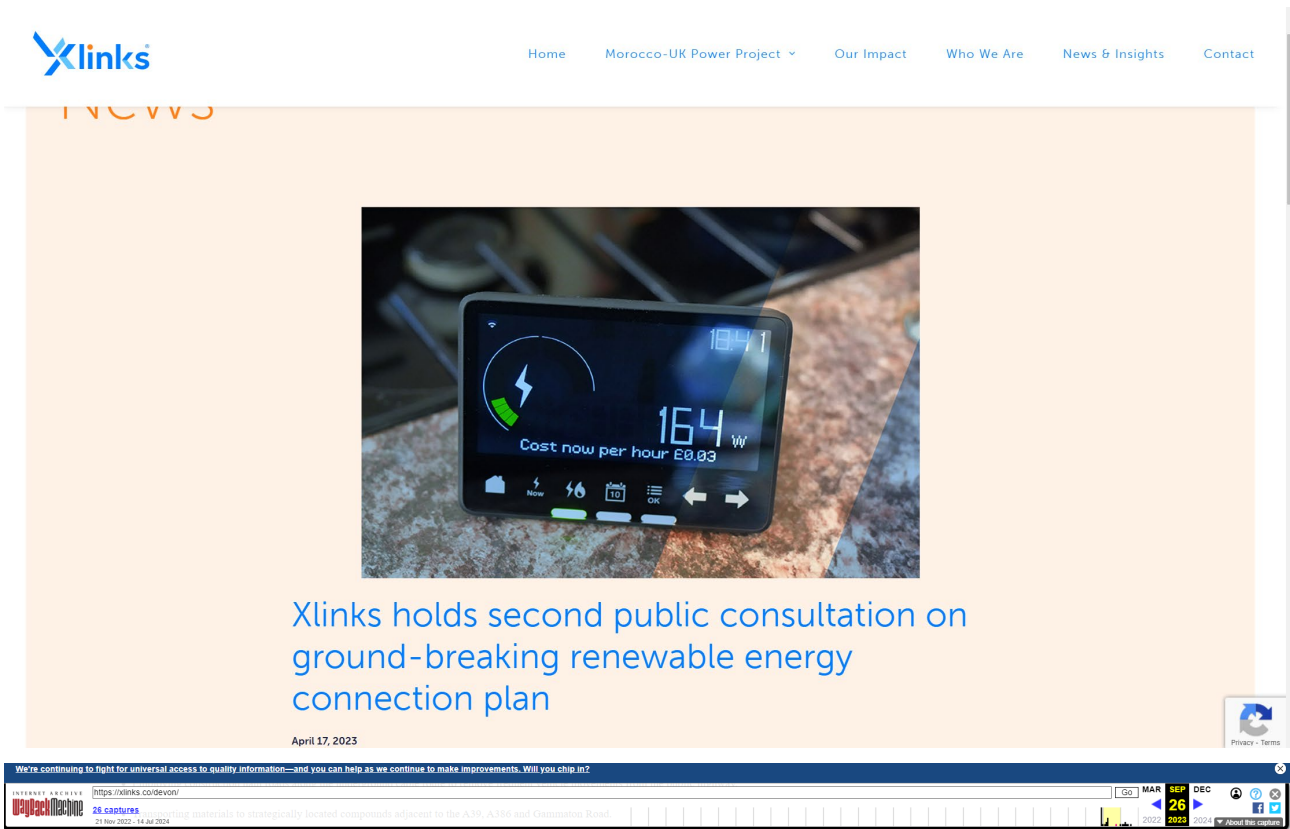


2030 – target for project completion

All project information can be viewed at www.xlinks.co/devon

2.4 Screenshots of website and Facebook page

2.4.1 Website



The screenshot shows the Xlinks website with a navigation menu (Home, Morocco-UK Power Project, Our Impact, Who We Are, News & Insights, Contact) and a news article titled "Xlinks holds second public consultation on ground-breaking renewable energy connection plan" dated April 17, 2023. The article features an image of a smart meter displaying a cost of 164 p/kWh. Below the article is a browser window showing a document titled "28 captures" with a date range of 21 Nov 2022 - 14 Jul 2024.

Further information

View the information boards from our second round of public exhibitions.

[Download here](#)



[Representative Viewpoints – Photomontages](#)

[Route Map](#)

[Proposed Alternative Route Avoiding Abbotsham – Aerial](#)

[View the information boards from our first round of public exhibitions](#)

Read our [Community Consultation Commitment](#).

2.4.2 Facebook page

Xlinks Devon

Intro

Page · Energy company

hello@xlinks.co

xlinks.co/devon

Not yet rated (0 reviews)

Photos See All Photos

Information about Page Insights data · Privacy · Terms · Advertising · Ad choices · Cookies · More · Meta © 2024

Xlinks Devon
17 April 2023 ·

Today marks the start of the second period of public consultation in Devon for our plans to connect 3.6GW of reliable renewable energy from Morocco to the GB electricity grid. Our public drop-in exhibitions are open to all, and you can find more information about attending at our website here:

Xlinks

XLINKS.CO

Devon - Xlinks
Xlinks' Renewable Energy Development in Devon, Morocco – UK Power Project is a vital part of...

Like Comment Send Share

3 SECTION 35 RESPONSE

3.1 Applicant's letter to the Secretary of State

These are inserted overleaf.

David Wagstaff OBE
Head of Energy Planning & Cyber Policy
Department for Energy Security and Net Zero
1 Victoria Street
London SW1H 0ET

30th August 2023

Dear Mr Wagstaff,

Request for a Direction by the Secretary of State under Section 35 of Planning Act 2008 (PA 2008) relating to the Xlinks Morocco - UK Power Project.

This letter is sent on behalf of Xlinks 1 Ltd (“Xlinks”) in relation to the project known as the Xlinks Morocco – UK Power Project (“the Project”). The Project is a generation project, dedicated to the UK, comprised of 11.5GW of renewable power (wind and solar) in Morocco, supported by battery storage with a two bi-pole HVDC system. It will deliver 3.6 Gigawatts (GW) of low carbon electricity to the UK’s grid and will improve the security and diversity of the UK’s electricity supply.

Xlinks is a privately funded UK company, which has been created to capture the power of nature to generate a near constant, low carbon energy supply and connect it to the point of consumption in real time.

The UK element of the Project comprises two converter stations, onshore high voltage direct current (HVDC) cables and offshore HVDC marine cables, high voltage alternating current (HVAC) cables connecting the convertor stations to a National Grid Electricity Transmission (NGET) substation located near Alverdiscott, in Devon, and other works required to build, maintain and operate the project (for ease of identification we shall refer to these elements as “the UK Project”).

We explain in more detail on page 3 of this letter the elements of the UK Project that should be considered as ‘Development’ for which a Direction is sought. Essentially this is the two converter stations. The proposed ‘Development’ does not fall squarely within the existing PA 2008 definition of a ‘nationally significant infrastructure project’ (S.14 to S.30 PA 2008). As such, Xlinks respectfully invites the Secretary of State to exercise his powers under S.35 of the PA 2008 in respect of it. Xlinks believes that the two UK converter stations that will provide electricity in the form required to feed into the GB electricity transmission system will be of national significance and should be considered as development for which a Development Consent Order (DCO) is required.

We are aware that it is not the purpose of S.35 of the PA 2008 to define what might be properly included as ‘associated development’. However, other elements of the UK Project are also likely to benefit from inclusion in a DCO made further to an application pursuant to PA 2008 as ‘associated development’ for the purposes of S.115 PA 2008. For clarity, we have also set out some of the considerations relating to this matter on page 4 of this letter.

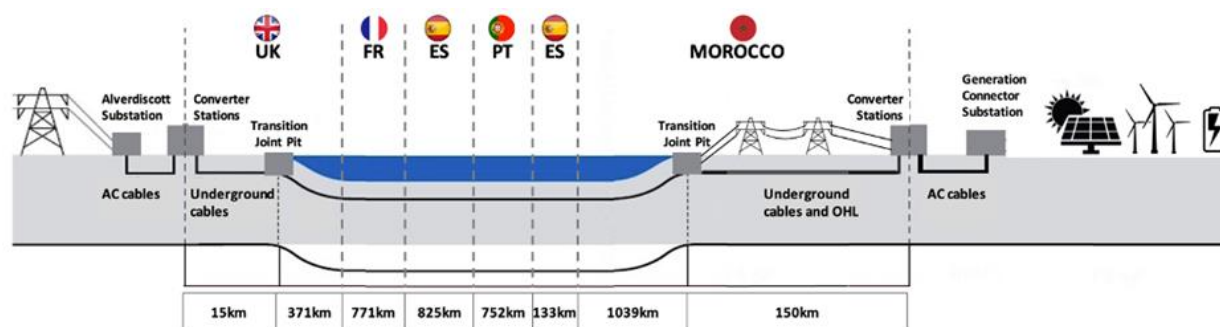
Onshore, the UK Project is located in the local authority areas of Torridge District Council (TDC) and Devon County Council (DCC). TDC is the relevant local planning authority and DCC is the relevant highway authority. Both TDC and DCC have been engaged to date and would be formal consultees under S.43(1) of PA2008. Xlinks has informally consulted with TDC on a number of matters relating to the UK Project since 2021. TDC has confirmed that it is supportive of the Secretary of State giving the requested direction, as set out in their letter of support (see Appendix A).

The Project

The Project will be a new electricity generation project entirely powered by 11.5GW of solar and wind energy combined with a battery storage facility. The generation assets will be located in Morocco and will cover an area of approximately 1,500 km², and the dedicated power will be delivered to the UK through two bi-poles, consisting of 4 HVDC cables, with an offshore route of approximately 3,800 km.

The Project will unlock the potential of dedicated, remote, renewable energy and enable the UK to diversify its energy supply, increase resilience and help support local and national carbon ambitions. The Project will provide a reliable supply of electricity that seeks to help address the needs of the GB power market, especially during periods of low offshore wind production around the UK. The Project will be entirely powered by solar and onshore wind energy combined with a battery storage facility. With the generation infrastructure located in Morocco, it will be capable of supplying 3.6 GW of power to the UK, meeting around 8% of the UK's electricity needs and helping the UK to meet carbon reduction commitments as well as diversifying and securing its energy supplies.

An overview of the Project is illustrated in the diagram below. It comprises an offshore route for the HVDC sub-sea cable circuits of approximately 3,800 km, together with shorter lengths of onshore electricity HVDC cable routes between new converter stations at each end, which are required to convert electricity from AC to DC and vice versa.

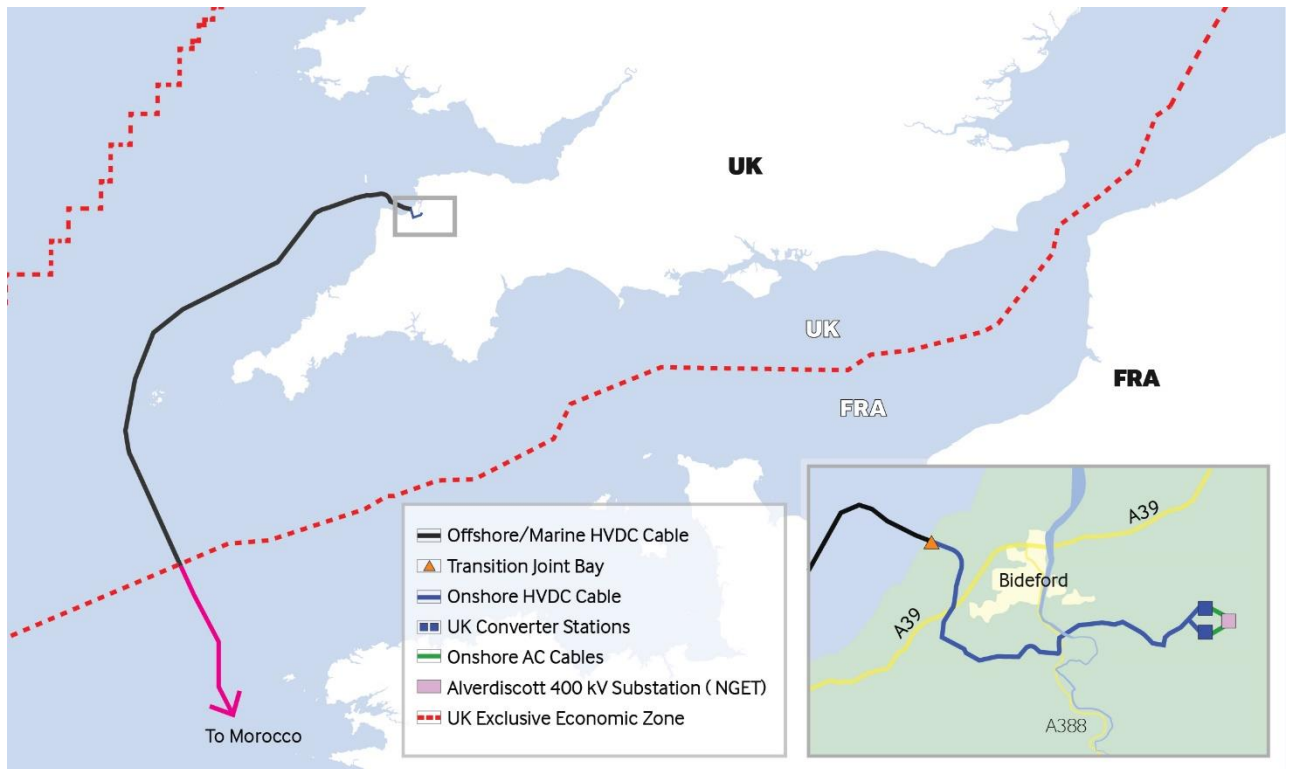


More specifically the Project comprises the following:

1. In Morocco, which is the 'Moroccan Onshore Scheme':
 - Generation assets comprising approximately 7.5 GW solar PV array, 4 GW wind turbine array and 22.5 GWh battery storage. In combination, and taking into account HVDC losses, generating 3.6 GW of power for the UK.
 - AC cables connecting the generation assets to the converter stations.
 - Converter stations to change electricity from AC to DC.
 - Onshore high voltage DC cables from the converter stations to the coast of western Morocco.
 - Transition joint to connect the onshore cables to the subsea cables.
 - The Project will only connect to the GB grid. It will not connect to the Moroccan grid.
2. In the sea (Morocco, Portugal, Spain, France and the UK) Exclusive Economic Zones (EEZ) and Territorial Waters (TW), which is the 'Offshore Scheme'.
 - Cable route of approximately 3,800 KM buried in the seabed or laid on the seabed with protection.
 - Of which approximately 371km are within UK waters.
 - The Project will not connect to the French, Portuguese or Spanish grids.
3. In the onshore administrative area of TDC:
 - Two converter stations to convert electricity from DC to AC electricity proposed on land immediately to the west of Alverdiscott 400KV substation, which will be screened from view by cut and fill earthworks and comprehensive landscaping.

- AC cables from the converter stations to the new equipment to be constructed by National Grid proposed within the curtilage of the Alverdiscott 400 KV substation for onward connection to the UK high voltage electricity transmission network.
- Offshore HVDC cables from Mean Low Water Springs to the Transition Joint Bay (“TJB”) proposed at landfall at Cornborough Range, approximately 2.5 kilometres south of Westward Ho! and 4 kilometres west of Bideford.
- Onshore HVDC cables from the TJB, via a route of approximately 14 kilometres, to the converter station site.

The UK Project is comprised of the parts of the Project within UK jurisdiction and within the scope of PA 2008. These are shown, schematically, in the figure below.



The onshore elements of the UK Project will cover an area of approximately 170 hectares in Devon, comprising approximately 30 hectares for the converter stations site and 140 hectares for cable routes. Other development may also be required for access, construction, operation and maintenance, including environmental mitigation and/or compensation measures.

The Project would, therefore, be a novel energy infrastructure project for the UK albeit it contains some of the physical elements of both interconnectors and offshore wind farms employing HVDC transmission, in that there are sub-sea cables connected to converter stations in the UK.

Development to which this request relates

Xlinks considers that the construction and operation of the two converter stations in the UK to convert and supply the electricity to the GB grid forms the development for which development consent should be required (“**the Development**” for the purposes of this request).

The Project is an innovative solution to meeting the UK’s net zero carbon goal and energy requirements; however, the elements which are not within the UK cannot be consented under the PA 2008. The converter stations are the most substantial elements of the UK Project in terms of built form and function and are the key elements of the UK Project delivering the electricity to GB and enabling electricity to be compatibly supplied to the GB transmission system. The converter stations are, therefore, the UK

elements of the Project that are comparable in form and function to those elements of other UK Nationally Significant Infrastructure Projects (NSIPs) in the field of electricity for which development consent is automatically required.

The Development (i.e. the converter stations) will facilitate the supply of 3.6GW of electricity for the UK and enable its delivery to the GB transmission system. This is vastly more electricity than the threshold for a generating station to be an NSIP by virtue of S.15 PA 2008 (50MW and 100MW for onshore and offshore generating stations, respectively).

Other elements of the UK Project may also benefit from inclusion in a DCO as “associated development” for the purposes of S.115 PA 2008. These elements include:

- The onshore HVDC cables from the TJB to the converter stations;
- The offshore HVDC cables and/or works to install the cables within the UK inshore territorial waters;
- Other works to facilitate the connection of the Project to the UK National Grid.

However, Xlinks does not consider these elements as development for which development consent should be required because these forms of development are more usually considered to be “associated development”¹. It is for applicants to decide whether to include something that could be considered as associated development in an application for development consent or whether to apply for consent for it via other routes².

Furthermore, parts of the offshore HVDC cables may not require a separate marine licence, being exempt under S.81 of the Marine and Coastal Access Act 2009, or might be dealt with more efficiently under a separate marine licence or licences³. Xlinks believes, therefore, that the parts of the HVDC system that should be included in the DCO should be determined as associated development in the same way that transmission works of this type are normally included in DCOs for other projects in the field of energy. Little purpose would be served by requiring development consent for parts of the project that would not otherwise require a licence (or consent) which would be the effect of requiring development consent for all elements of the UK Project. We have acknowledged that it is not for S.35 directions to determine what is properly considered as ‘associated development’ but this issue is important to defining the development to which the S.35 request does relate. Other projects that have been subject to S.35 directions have also adopted this approach, notably the Nautilus Interconnector and the Continental Link Multi-Purpose Interconnector.

Reasons to give the Direction

The proposed Development does not fall within the existing PA 2008 definition of a ‘nationally significant infrastructure project’ (S.14 to S.30 PA 2008). As such, Xlinks respectfully invites the Secretary of State to exercise his powers under S.35 of the PA 2008 in respect of it.

This letter is a qualifying request within the meaning of S.35ZA(11) of the PA 2008 as it specifies the development to which the request relates (i.e. the Development) and because the conditions in S.35(2)(a) and (b) PA 2008 are met in relation to the Development as follows:

1. Field of Energy (PA 2008 S.35(2)(a)(i))

The Development forms an integral and essential part of the UK Project (which itself forms part of the wider Project) which is in the field of energy, as it will enable a considerable amount of low carbon electricity to be exclusively supplied to the GB electricity network, as described above. The converter stations form an integral part of the technology that facilitates the supply of the energy to the GB grid.

¹ Annex A and Annex B of Planning Act 2008 - Guidance on associated development applications for major infrastructure projects. DCLG 2013 (the “Guidance”).

² Ibid. Page 4 (8) of the Guidance.

³ E.g. offshore cable protection requirements, some of which might become apparent later, nearer to installation.

2. Wholly in England (PA 2008 S.35(2)(b))

The request only relates to the Development which is wholly located within England.

National Significance (PA 2008 S.35(2)(c))

Xlinks considers the UK Project (and the proposed Development forming a part of it) to be of national significance for several reasons including:

- i) The UK Project is part of the Project which is large-scale in terms of the electricity generation capacity delivering 3.6GW of electricity to the GB grid. The UK Project is the relevant part of the Project for the purposes of PA 2008.
- ii) The Project (and the UK Project element) is in response to the pressing need for the UK to decarbonise its electricity network, which currently is overly reliant on gas power stations with a small number of coal-fired power stations as emergency back-up. In order to decarbonise its electricity supply network by 2050, the UK needs to act now to bring on stream more reliable and efficient low carbon energy sources and at scale.
- iii) The Project (and the UK Project element) will generate electricity to meet approximately 8% of the UK's electricity needs and as such will also help to secure and diversify electricity supply at a time when energy security and diversity is an increasing concern for the UK.
- iv) The Project is greater in scale than other projects that have been considered to be of national significance, including: AQUIND Interconnector; Continental Link Multi-Purpose Interconnector; LionLink Multi-Purpose Interconnector; Nautilus Interconnector; and Sea Link Reinforcement Project.
- v) The converter stations, proposed on land to the west of Alverdiscott electricity sub-station, will be substantial buildings located in the Devon countryside. Considerable amounts of "cut and fill" earthworks, combined with significant landscaping proposals, will be required to blend the Development into the rural landscape. It is important to ensure that these important buildings, and their effects, in combination with other elements of the Project, are given the correct level of consideration at a national level.
- vi) The amount of electricity generated by the Project (and delivered by the Development) will be considerably more than that of many generating stations that would fall within S.15 of PA 2008.

Xlinks also confirms that no previous application for a consent or authorisation mentioned in S.33(1) or (2) of PA 2008 has been made in relation to either the UK Project or the proposed Development forming part of it.

Approving this request under S.35 of the PA 2008 will ensure that the proposed Development is considered by the same decision maker as other relevant projects in England, such as those listed above. In addition, this may avoid any confusion amongst stakeholders that could result from different projects with similar features being considered under different consenting regimes (e.g. TCPA 1990) with differing processes and potentially different outcomes.

Also of importance to note is that the UK Government's stated vision is to ensure safe, secure and affordable power supplies for the future. This is set out in the overarching National Policy Statement (NPS) EN-1 (2011), which includes the following:

- Paragraph 2.2.16, EN-1 sets out that "about a quarter of the UK's generating capacity is due to close by 2018 and new low carbon generation is required which is reliable, secure and affordable." This paragraph also notes that "with the total investment requirement in the electricity sector alone estimated to be over £100 billion by the end of this decade, much more has to be done to unlock this investment".
- Paragraph 3.3.15 states that "In order to secure energy supplies that enable us to meet our obligations for 2050, there is an urgent need for new (and particularly low carbon) energy NSIPs to be brought forward as soon as possible, and certainly in the next 10 to 15 years, given the crucial role of electricity as the UK decarbonises its energy sector."

Application of National Policy Statements

It is our view that Overarching National Policy Statement 1 (NPS EN-1) (and any updated version of NPS EN-1) should have effect in relation to the application and we seek Secretary of State's confirmation in the Direction.

Although when EN-1 was written (in 2011) the Project was not even considered, EN-1 does acknowledge that (3.2.2) *'We need to become less dependent on some forms of energy, as new and innovative low carbon technologies and energy efficiency measures are taken up ...'* and the urgent need for new NSIPs at 3.3.15 (as above).

The emerging version of NPS EN-1 (March 2023) is even more clear that new and innovative technologies are required. At 3.2.2 it acknowledges *'We need a range of different types of energy infrastructure to deliver these objectives. This includes the infrastructure described within this NPS but also more nascent technologies, data, and innovative infrastructure projects consistent with these objectives'*. Also, at 3.2.4 *'It is for industry to propose new energy infrastructure projects within the strategic framework set by government... the government does not consider it appropriate for planning policy to set limits on different technologies but planning policy can be used to support the government's ambitions in energy policy and other policy areas.'*

At paragraph 3.3.62 the emerging version of EN-1 (March 2023) also acknowledges that the need for secure, reliable and net-zero consistent electricity supply and the weight attached to it in the NPS should also apply to novel projects: *'Other novel technologies or processes may emerge during the life of this NPS, which are nationally significant and can help deliver our energy objectives. Where these deliver on our objectives, then such technologies or processes can be regarded as needed, and as such should be given substantial weight.'*

It is for the Secretary of State to determine whether the NPS has effect. If he were to then this would form an important part of the policy basis for consideration of the UK Project (including the Development) that is consistent with other energy NSIP projects. It would also mean that the UK Project would be required to be considered in accordance with policy that takes account of the national need for energy infrastructure, which the UK Project helps to address.

Conclusion

For the reasons set out above the proposed Development, which forms part of the larger-scale Project, is a proposal in the field of energy (PA 2008 S.35(2)(a)(i)); is wholly in England (PA 2008 S.35(2)(b)) and is of national significance (PA 2008 S.35(2)(c)).

This request is a qualifying application within the meaning of S.35ZA of the PA 2008. No previous request for consent or authorisation mentioned in S.33(1) or (2) of the PA 2008 has been made in relation to the proposed Development nor any element of the UK Project.

Accordingly, Xlinks respectfully invites the Secretary of State to direct that the UK Project is of national significance and that the proposed Development is treated as development for which development consent is required.

Yours sincerely

David Kelly
Development Director, Xlinks

Appendix A – Letter of support from Torridge District Council

3.2 Letter from Torridge District Council to the Applicant

Torridge – a great place to live, work and visit
Riverbank House, Bideford, Devon, EX39 2QG



Please reply to:

Principal Planning Officer: Ryan Steppel
Direct Dial: [REDACTED]
Email: [REDACTED]@torridge.gov.uk

Date: 16th August 2023

Dear Mr Bailey,

X-Links Project – HVDC Cables and Converter Stations (Morocco- Alverdiscott Link)

Thank you for your correspondence which advises the Local Planning Authority of your intention to submit a request to the Secretary of State to seek confirmation that the project is a Nationally Significant Infrastructure Project (NSIP) for which development consent is required.

Torridge District Council is supportive of the proposal being considered a Nationally Significant Infrastructure Project, as per the Planning Act 2008. Torridge District Council considers that the proposal would be best considered through the DCO process, noting that similar projects have been considered under such legislation.

Torridge District Council looks forward to assisting you with the DCO process where possible, whilst supporting the delivery of any community benefits which will be derived from this project.

Yours sincerely,

Ryan Steppel

Principal Planning Officer – Torridge District Council

Kristian Evely

Development Manager – Torridge District Council

torridge.gov.uk



[@torridgedc](https://twitter.com/torridgedc)

3.3 Newsletter

This is inserted overleaf.

INTRODUCTION

It's been a few months since our previous public consultation on the Morocco-UK Power Project.

We've been busy since then considering feedback from the consultation, continuing our environmental assessments, and developing our plans in more detail.

This newsletter includes an update on what we've been doing since the consultation. It also has an important update on how and when we will be seeking planning permission for the project.

WHAT HAVE WE BEEN UP TO?

We'd like to thank the many members of the local community who attended our last set of public information days in Huntshaw, Alverdiscott, East-the-Water, and at Caddsdwn in April and May.

It was a pleasure to update participants on our proposals, including the relocation of the converter station site closer to the existing National Grid substation, an alternative underground cable route to avoid Abbotsham village, and further detail regarding the construction and transport routes to be employed by the project.

Since then, we have carefully considered all feedback from the consultation, as well as completing archaeological and ecological survey work and continuing technical work to support our landscape and transport strategies.

UPDATE ON THE PLANNING PROCESS

You may remember that we had originally planned to seek planning permission from Torridge District Council for the project. After careful consideration, we have come to the conclusion that it would be more appropriate to apply to the Secretary of State for Energy Security and Net Zero for a Development Consent Order (DCO).

This is because we believe the project is a Nationally Significant Infrastructure Project (NSIP). This is a type of project that needs a special type of planning permission through the DCO process.

This reflects the major contribution that the project will make to the country's climate commitments and energy security. The planning process for projects of this type is set in law by the Planning Act 2008. This provides certainty and clarity for everyone involved in the process.

WHAT IS THE PLANNING PROCESS FOR NATIONALLY SIGNIFICANT INFRASTRUCTURE PROJECTS?

NSIPs are major developments which require development consent to be granted by the relevant Secretary of State through a DCO. This is a process established by the Planning Act 2008.

Unlike local planning applications, which are considered by local authorities, DCO applications are made to the Planning Inspectorate (PINS). PINS administers the application process on behalf of the Secretary of State. In this case, the relevant government department is the Department for Energy Security and Net Zero.

This process includes an independent examination of the application, which results in a recommendation to the Secretary of State on whether to grant a DCO or not. Before submitting a DCO application, project promoters are required by the Planning Act 2008 to consult with local authorities, statutory bodies, land interests and the community. Further information is available at: <https://infrastructure.planninginspectorate.gov.uk/>

WHAT DOES THIS MEAN FOR ME?

The consultation we have carried out to date has been really important in shaping our plans. We will include a full record of it with our application for a DCO. Consultation is also a legal requirement for NSIPs. This means we must conduct a further round of consultation, before we submit our DCO application.

As part of this, we will consult with the community, local authorities, statutory bodies and people with a legal interest in land affected by the project. While the decision on the application will not be made by your local council, it still has a really important role in the process. We must consult with Torridge District Council and Devon County Council on our approach to consultation, as well as our plans.

When we submit our DCO application, PINS will ask these councils to confirm whether we have met the legal requirements for consultation. If they feel our consultation has not been adequate, or we haven't properly considered consultation responses, our application will not progress to the next stage of the process.

Environmental Impact Assessment (EIA) Scoping

We will seek PINS' views on the issues that are to be considered in our EIA.

Statutory consultation

We will consult in line with the requirements of the Planning Act 2008.

Submission of the DCO application

We will have regard to all consultation responses, continue our EIA and finalise our DCO application.

Acceptance

PINS will have 28 days to decide whether to accept our DCO application. It will consider whether we have complied with pre-application requirements, including for consultation.

Pre-Examination

There will be an opportunity to register as an Interested Party and take part in the examination.

Examination

This is a fixed process with statutory timescales. The DCO application will be scrutinised by an independent Examining Authority.

Decision

The Examining Authority will make a recommendation on whether our DCO application should be granted. The relevant Secretary of State will make the final decision.

Construction

Once we have the required consents, we will be able to begin construction.

Next steps

We have written to the Secretary of State for Energy Security and Net Zero to ask them to confirm that the project can be considered as a NSIP.

This is known as a section 35 request. Our application to be considered as a NSIP is supported by Torridge District Council.

The Secretary of State will have 28 days to decide whether to grant our request. Once we have a decision, we will update you.

We will then carry out further consultation on our proposals with the local community – not only is it a requirement under the Planning Act 2008, but we believe it is the right thing to do. We will be back in touch with further details on this later in the year.

FAQs

Why the change?

The Morocco-UK Power Project holds significant potential to contribute to the country's net-zero goals, making the reliability of project delivery and timelines crucial.

The proposed change in planning process recognises this. It will mean that the project enters a regulatory regime with fixed, statutory processes set in law by the Planning Act 2008.

Isn't this just a way of taking the decision out of local hands and reducing our ability to influence it?

No. Under the Planning Act 2008, we will carry out further consultation with the local community, as well as local authorities, regulatory bodies and service providers. We also need to carry out technical and environmental assessments of our proposals and to undertake an EIA which will be reported in an Environmental Statement that will accompany our DCO application.

As part of our application, we will show how we have considered feedback from the consultation and will produce a consultation report. Our application will not be accepted for examination if PINS judges we have not adequately considered consultation feedback. If our DCO application is accepted, there will be an opportunity for local people to register to take part in the examination.

What about the community's feedback and engagement to date? Is that all wasted?

No. The comments we have received to date, both from local residents and stakeholders, have been carefully reviewed by the project team. Where appropriate, they will be reflected in our proposals moving forward that will be the subject of future consultation.

What does this mean for your timescales?

There is a fixed legal process for applying for a DCO, which comes with set timescales. We need to hold another round of consultation before we can submit our DCO application.

We expect to hold that consultation in early 2024 and to submit our DCO application later in the year.



Contact Us

Email: info@xlinks.co

Phone: 01271 268830

Website: xlinks.co

3.4 Press release



27 September 2023

MOROCCO-UK POWER PROJECT CONFIRMED AS NATIONALLY SIGNIFICANT INFRASTRUCTURE

- *The Secretary of State for Energy Security and Net Zero has confirmed that the Morocco-UK Power Project is a Nationally Significant Infrastructure Project.*
- *The change would mean the project falls under the Planning Act 2008, requiring a Development Consent Order from the Government rather than planning permission from the local authority.*
- *Xlinks will carry out a further round of consultation on its plans before applying for a Development Consent Order next year.*

The Secretary of State for Energy Security and Net Zero has confirmed that proposals by Xlinks, a private renewable energy company headquartered in the UK, to connect 3.6GW of low-cost, reliable, renewable power from Morocco to the Great British electricity grid qualify as a Nationally Significant Infrastructure Project.

Nationally Significant Infrastructure Projects, often known as NSIPs, are major infrastructure projects that require development consent to be granted by the relevant Secretary of State through a Development Consent Order. They follow a strict legal process with fixed timescales set out in the Planning Act 2008, which requires projects to carry out public consultation and undergo an independent examination.

The confirmation that the project is a Nationally Significant Infrastructure Project means Xlinks will need to carry out further consultation with local authorities, statutory bodies and the community before applying to the Secretary of State for Energy Security and Net Zero for planning permission. This consultation is expected to take place early next year.

Simon Morrish, CEO, Xlinks said:

“This is a major milestone for our project, which provides certainty and clarity over the legal process and timescales for consenting the project. The decision reflects the real difference that our project can make to the country’s climate commitments and energy security.

“Our next step will be to consult further with the community to meet the requirements of the Planning Act 2008. We are looking forward to another opportunity to discuss our proposals with people living in the area and will share more details of this later in the year.”

ENDS