

# **XLINKS' MOROCCO-UK POWER PROJECT**

## **Consultation Report**

**Annex C: SoCC development, publication and compliance  
Appendices C-1 to C-4**

**Document Number: 5.2**

**PINS Reference: EN10164/APP/5.2**

**Section 37(3)(c) Planning Act 2008**

**APFP Regulations: Regulation 5(2)(q)**

**November 2024**

**For Issue**

## XLINKS' MOROCCO – UK POWER PROJECT

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Document status					
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For Issue	Application	SEC Newgate UK	Xlinks 1 Ltd	Xlinks 1 Ltd	November 2024

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**Prepared by:**

**SEC Newgate UK Ltd**

**Prepared for:**

**Xlinks 1 Limited**

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## **Contents**

<b>1</b>	<b>DRAFT STATEMENT OF COMMUNITY CONSULTATION.....</b>	<b>1</b>
<b>2</b>	<b>LETTERS TO LOCAL AUTHORITIES CONSULTING THEM ON THE DRAFT STATEMENT OF COMMUNITY CONSULTATION .....</b>	<b>2</b>
2.1	Devon County Council .....	2
2.2	Torridge District Council.....	3
2.3	North Devon Council.....	3
<b>3</b>	<b>LOCAL AUTHORITY RESPONSES TO CONSULTATION ON THE DRAFT STATEMENT OF COMMUNITY CONSULTATION .....</b>	<b>4</b>
3.1	Devon County Council .....	4
3.2	North Devon Council.....	5
<b>4</b>	<b>REGARD HAD TO LOCAL AUTHORITY RESPONSES TO THE DRAFT STATEMENT OF COMMUNITY CONSULTATION .....</b>	<b>6</b>

# 1 DRAFT STATEMENT OF COMMUNITY CONSULTATION

This is inserted overleaf.



# Xlinks Morocco-UK Power Project Statement of Community Consultation

**DRAFT FOR LOCAL AUTHORITY CONSULTATION**

25 April 2024

## Introduction

### Overview

Xlinks 1 Ltd ('Xlinks') is inviting feedback from the local community on its proposals for the Xlinks Morocco-UK Power Project, which will connect into the National Grid at Alverdiscott substation in Devon, as part of a public consultation from **START DATE to END DATE**.

**Commented [D1]:** Currently planned for 16 May - 27 June 2024 or equivalent 6 week period

### What is this document?

This document, known as a Statement of Community Consultation (SoCC), sets out how we plan to consult with the local community. It includes details on:

- The proposed development and developer information
- The planning process
- Our approach to community consultation
- What we will be consulting on
- Who we will be consulting
- How we will consult the local community
- How we will publicise the consultation
- The consultation arrangements
- What we will do with feedback from the consultation

### Why are we publishing this document?

The project is a Nationally Significant Infrastructure Project (NSIP) for the purposes of the Planning Act 2008 and requires consent from the Secretary of State for Energy Security and Net Zero via a Development Consent Order (DCO). We have therefore published this document, in line with the requirements of section 47 of that Act and regulation 12 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, to help people understand how we will seek their views on the project. We very much want feedback from the local community on our proposals and this document sets out the different ways you can find out more and respond.



## The Applicant

### About us

Xlinks is the company behind the Xlinks Morocco-UK Power Project. We are a private business, headquartered in the UK and made up of team of power industry leaders driven by an ambition to change the way we think about low carbon energy. Our team includes the technical and project leads who delivered the North Sea Link, currently the longest subsea interconnector in the world.

### About the Xlinks Morocco-UK Power Project

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.

This "first of a kind" project will generate 11.5GW of zero carbon electricity from the sun and wind to deliver 3.6GW of reliable energy for an average of 20+ hours a day. This is enough to provide low-cost, clean power to over 7 million British homes. Once complete, the project will be capable of supplying 8 percent of Great Britain's electricity needs.

Alongside the consistent output from its solar panels and wind turbines, an onsite 22GWh/5GW battery facility will provide sufficient storage to reliably deliver, a dedicated, near-constant source of flexible and predictable clean energy for Great Britain, designed to complement the renewable energy already generated across the UK.

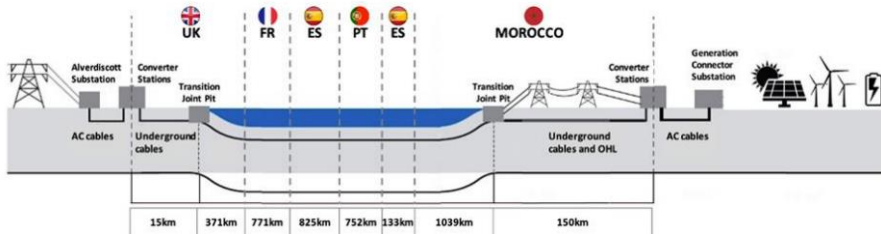
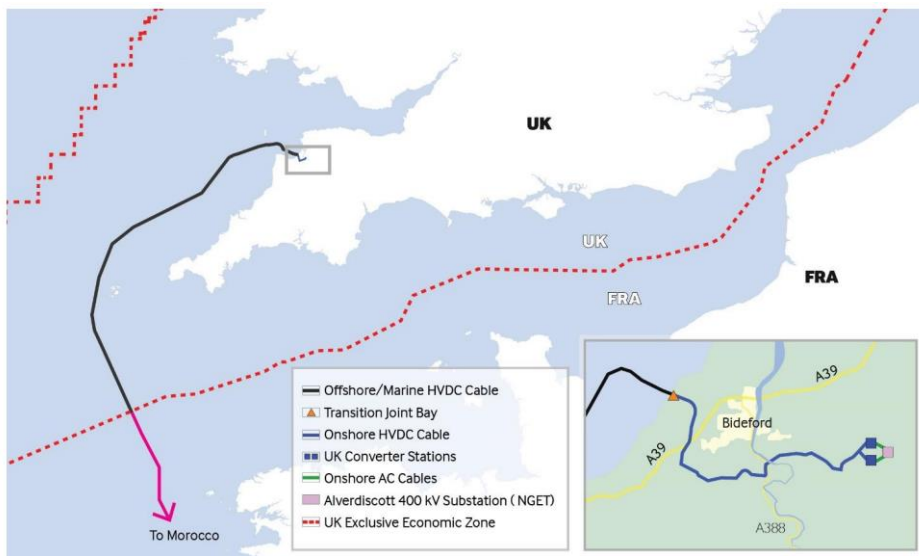


Figure 1: Overview of the Xlinks Morocco-UK Power Project

Within the UK, the project comprises:

- Two bundled pairs of High Voltage Direct Current (HVDC) marine cables laid in two trenches, one trench per bundle, on the seabed for approximately 391km within UK.
- Landfall at Cornborough Range, approximately 2.5km south of Westward Ho! and 4km west of Bideford, comprising the landing point for the offshore HVDC cables and buried transition joint bay on land, near to the shore, where offshore cables are joined to the onshore HVDC cables; and ducts installed below the shoreline into the seabed below mean low water.
- Two converter stations to convert electricity from Direct Current (DC) to Alternating Current (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. These will be connected to the landfall point by approximately 14km of onshore HVDC cables from landfall to two converter stations.
- AC cables from the converter stations to the new equipment proposed to be built by National Grid within the curtilage of its Alverdiscott 400 KV substation for onward connection to the GB high voltage electricity transmission network.

It is these parts of the project that form part of the DCO application and which we are consulting upon.



**Figure 2: The UK elements of the project**

The project design presented through this consultation has been informed by two previous rounds of public consultation, in November 2022 and April-May 2023. Changes made in response to feedback from the community included moving the converter station site to the Old Webbery Showground and diverting the cable route to the west of Abbotsham.



## The planning process

### Why is the project an NSIP?

The Secretary of State for Energy Security and Net Zero directed in September 2023 that the project should be considered as a Nationally Significant Infrastructure Project. This was because:

- The 3.6 Gigawatts (GW) of low carbon electricity it would deliver to the UK's grid could improve the security and diversity of the UK's electricity supply.
- It could play an important role in enabling an energy system that meets the UK's commitment to reduce carbon emissions and the Government's objectives to create a secure, reliable and affordable energy supply for consumers.
- Progressing the development as an NSIP would provide the certainty of a single, unified consenting process and fixed timescales.

Unlike planning applications, which are considered by local authorities, DCO applications are made to the Planning Inspectorate (PINS). This independent body administers the application process on behalf of the relevant Secretary of State – who makes the final decision on the application.

For the project, the decision will be made by the Secretary of State for Energy Security and Net Zero.

PINS has produced a guide to the application process for members of the public. This is available on its website: <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2013/04/Advice-note-8.0.pdf>

Figure 3 shows each stage of the planning process for NSIPs.



Figure 3: the planning process for NSIPs





## The Planning Act 2008 and consultation

NSIPs are governed by a fixed, statutory process, which requires us to:

- Consult with persons with specified interests in the land to which the project relates, and certain bodies as prescribed under section 42 of the Planning Act 2008.
- Consult the local community under section 47 of the Planning Act 2008.
- Publicise the proposals locally and nationally under section 48 of the Planning Act 2008.

This means we are following a well-established and clear process to develop our proposals. This provides a fixed role for local authorities, including reviewing and commenting on this SoCC and responding to our proposals as a statutory consultee.

We will meet these requirements for consultation by holding what is known as a statutory consultation. We are publishing this document before the statutory consultation to help local people understand how they can find out more and share their views. We will use the feedback that we receive during the statutory consultation to help us develop our final proposals for the project, before submitting our DCO application.

As part of our DCO application, we will submit a Consultation Report detailing our approach to consultation, the feedback that we received during the statutory consultation, and how we have had regard to it. This means we will explain how we have considered feedback – either to update our proposals or to explain where this has not been appropriate.

When considering our DCO application, the Secretary of State will consider whether the consultation that we have undertaken has been adequate, including whether we have had due regard to consultation feedback.

## Environmental Impact Assessment (EIA)

The project counts as EIA development for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and so we are also carrying out an EIA in line with these. This involves assessing any likely significant environmental effects from our proposals and, where appropriate, proposing mitigation. We have already sought advice from PINS and stakeholders on how we should assess potential environmental impacts from the project. PINS has set out the results of this process in a document called a Scoping Opinion. This is available online at the following location:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010164/EN010164-000008-EN010164-Scoping%20Opinion.pdf>

As part of the statutory consultation, we will share preliminary findings of our EIA and our initial proposals for mitigation through a document called a Preliminary Environmental Information Report (PEIR). The PEIR will be publicised and consulted upon during the statutory consultation in the same way described in this document for the other consultation materials included in that consultation.

Following the consultation, we will finalise our assessments and report on them in a document called an Environmental Statement (ES). This will form part of our DCO application.



#### [Find out more](#)

You can find more information about the Planning Act 2008, PINS and its role and how to participate in the DCO process on the PINS National Infrastructure Planning website:

<https://infrastructure.planninginspectorate.gov.uk/>, or by calling PINS on 0303 444 5000.



## Consulting the community

### Overview of the consultation

We are inviting the community living in the vicinity of the project to take part in the statutory consultation and provide feedback on our proposals. Through consultation, we want to:

- Ensure that those potentially affected by our proposals have ample opportunity to understand them and provide their views.
- Gain useful feedback on the project which will help improve our design and EIA process.
- Comply with the requirements set by the Planning Act 2008 for projects of this type.

In this period of statutory public consultation, we will make information about our plans available, including details of our advanced design proposals. This will be an opportunity for members of the community to influence the project by submitting feedback.

### Developing our approach to consultation

We have already consulted extensively with the community on our plans for the Xlinks Morocco-UK Power Project. This has included two rounds of consultation already, in November 2022 and March-April 2023.

These have informed the approach to consultation set out in this document, by:

- Highlighting key local stakeholders, including residents.
- Establishing the most appropriate locations to hold public consultation events.
- Identifying the issues of most concern to residents and interested parties.

In addition, we have consulted with Torridge District Council and Devon County Council as host authorities as defined by section 43(1) of the Planning Act 2008 on the development of this SoCC. We have also sought views from North Devon Council given the proximity of parts of the project to its administrative area.

**Table 1** below summarises comments received from these authorities through the consultation and how we have had regard to them in developing the SoCC.

**Table 1: Regard had to local authority comments on the draft SoCC**

Issue raised	Regard had
The use of diagrams, maps etc in the SoCC and future consultation documents to establish the context of the proposal and the NSIP process is encouraged.	Diagrams are included at figures 1, 2 and 3 in this document to explain the planning process and the proposals. Further use will be made throughout consultation materials.
It is recommended that Table 3 is edited to show Zone 2 as receivers on newsletters.	Table 3 has been updated to reflect this comment.
Table 3 should be clearer that more than one exhibition is planned.	Table 3 has been updated to reflect this comment



Direct engagement is offered to community and voluntary organisations, should parish councils within Zones 1 & 2 also be offered direct engagement?	Yes – Table 3 has been updated to reflect this comment.
The SoCC should be clearer about the purpose of deposit points.	These are places in and around consultation zones 1 and 2 where consultation documents will be made available to view. The language in the section on consultation materials and around the list of deposit points has been updated to make this clear.
The use of social media should be considered to publicise and attract engagement with the project – at present, the statement only looks to utilise social media platforms of other organisations	Table 3 has been updated to make it clear that the consultation will be publicised through social media advertising.
More detail should be provided on how Xlinks will respond to consultation feedback.	Additional detail has been provided in the section above on the Planning Act 2008 and consultation.
More detail should be provided on the seldom heard groups that will be consulted. This should include local authority economic development teams.	We have shared a list of seldom heard groups proposed to be consulted with Torridge District Council, Devon County Council and North Devon Council. This includes local authority economic development teams.
Consultation could inform legacy points for the project.	This is agreed and considered to be within the scope of ‘short and long term effects’ set out in the ‘What will we be consulting on?’ section below.

### What will we be consulting on?

During the statutory consultation, we will be asking for views on:

- The project.
- The short-term and long-term effects of the project including:
  - Construction impacts.
  - Environmental impacts.
  - Operational impacts.
- The Preliminary Environmental Information Report.

### Who will we consult?

We will consult widely in accordance with this SoCC and encourage participation in the consultation from any person or group who is interested in the project within the geographic areas set out in Table 2 below.



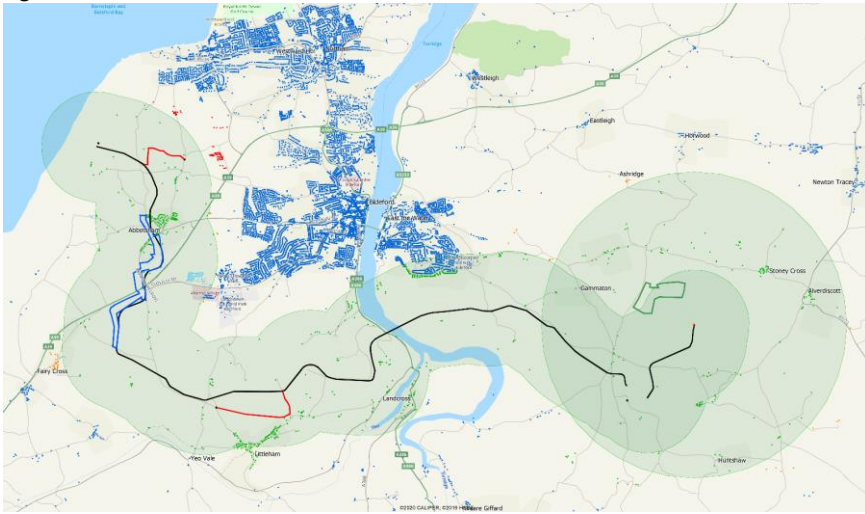
We have defined a series of 'zones of consultation' for publicising the consultation directly to the local community for the purposes of section 47 of the Planning Act 2008. This recognises that the levels of potential impact and interest are likely to vary with geography. We will use different consultation techniques within each zone.

These zones are set out in Table 2 below alongside a map of the zone 1 and 2 consultation area in Figure 4.

**Table 2: Zones of consultation**

Zone	Definition
1	People living and working within an area of 1.5 miles from the converter station site.
2	People living and working within an area of 0.5 miles from the onshore cable route from the converter stations to landfall.
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.
4	People with an interest in the offshore parts of the project.

**Figure 4: Consultation zones 1 and 2**



We will also continue our engagement and consult with a range of statutory consultees as set out by section 42 and section 48 of the Planning Act 2008 and regulation 13 of the EIA Regulations.



## How will we consult?

We will use a range of techniques to consult the community, which will be guided by the zones of consultation. These are designed to allow people with different needs across the community to take part in the consultation in a way that is convenient to them. These are set out in Table 3 below.

**Table 3: Consultation publicity and techniques**

How we will publicise the consultation	Zone 1	Zone 2	Zone 3	Zone 4
Writing to all addresses within the zone	✓	✓		
Writing to elected representatives, parish and town councils and community groups within the zone with details of the consultation	✓	✓		
Sharing a poster with consultation details with parish councils and community groups within the zone	✓	✓		
Writing to the Leader and Chief Executive of local authorities within the zone	✓	✓	✓	
Publicising the consultation in the North Devon Gazette, Devon Live and Fishing News	✓	✓	✓	✓
Publicising the consultation via regional and local broadcasters including BBC Radio Devon	✓	✓	✓	✓
Advertising the consultation online and through social media advertising	✓	✓	✓	✓
How we will consult				
Sending a newsletter summarising the project and how to take part in the consultation	✓	✓		
Holding public exhibitions at the venues listed in Table 4 below in or close to the zone	✓	✓		
Providing copies of consultation materials for review at the locations ('deposit points') listed in Table 5 below and online via a dedicated page on the project website	✓	✓		
Contacting parish and town councils, community and voluntary organisations within the zone to offer direct engagement	✓	✓		
Inviting elected representatives to take part in briefings	✓	✓	✓	
Publication of consultation information online at a dedicated project page on the project website	✓	✓	✓	✓
Inviting enquiries and responses online through the consultation 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				✓

## Changes to consultation arrangements

It may be necessary to publicise changes to specific consultation arrangements during the consultation period – for example, should we need to provide updated information about the timing or venue for a



consultation event. If this is the case, we will publicise the change in arrangements using the methods set out for the relevant consultation zone in Table 3.

### Consultation materials

We will produce a range of materials providing information as part of the consultation:

- A consultation newsletter.
- A consultation booklet.
- A consultation questionnaire.
- Information boards (for public exhibitions).
- A presentation to be delivered online as part of the webinar.
- Plans and maps showing the project.
- A Preliminary Environmental Information Report.

Copies of consultation information will be made available for review free of charge online at the consultation page on the project website and at publicly accessible locations in consultation zones 1 and 2 ('deposit points'), as well as on a USB key on request. Hard copies of the newsletter and consultation booklet will also be made available on request using the contact details in this document.

### Collection of feedback

To capture participants' feedback, we will produce a consultation questionnaire inviting comments on the different elements of the project. It will be available online through the consultation page on the project website, at consultation events and at deposit points. Consultees will be able to respond during the consultation period by completing a questionnaire online or returning a completed questionnaire using the contact details set out in this document. Pre-addressed Freepost envelopes will also be made available on request.

### Seldom heard audiences

It is important to ensure that consultation is inclusive and enables participation from a wide range of audiences, including those who are seldom heard in public consultation such as young people, people with disabilities and those for whom English is not a first language. We will do this by:

- Making provision for people who do not have access to the internet through the consultation programme. This includes the public exhibitions.
- Choosing accessible venues for public information points and the public exhibitions.
- Producing our consultation materials in accessible formats on request.
- Contacting community and voluntary organisations including parish and town councils and schools within consultation zones 1 and 2 to offer direct engagement and sharing a consultation information pack designed to support them in promoting consultation through their own existing communication channels such as social media feeds.
- Providing a variety of communication channels including a Freephone number, email address and Freepost address for those seeking information.





## Consultation arrangements

### How to take part in the consultation

The statutory public consultation on the project will take place between **START DATE and FINISH DATE**.

Consultees can find out more by:

- Contacting us on [hello@xlinks.co](mailto:hello@xlinks.co) or 01271 268830
- Attending a public exhibition at the following dates and times:

**Table 4: Exhibition venues**

Venue	Date and time
Caddsdwn Business Centre, Caddsdwn Industrial Park, Clovelly Rd, Bideford EX39 3BE	TBC
Huntshaw Parish Hall, Huntshaw, Torrington EX38 7HH	TBC
Alverdiscott Village Hall, Stoney Cross, Bideford EX39 4PZ	TBC
Pollyfield Community Centre, Avon Rd, Bideford EX39 4BL	TBC
Abbotsham Village Hall, Abbotsham, Bideford EX39 5AP	TBC

- Attending a webinar at the following date and time: TBC
- Reading a newsletter summarising our proposals. We will send a copy of the newsletter to all addresses in consultation zones 1 and 2. The letter will also be available from a dedicated project page on the project and on request.
- Reading a consultation booklet summarising our proposals, the PEIR and other consultation documents by going to the dedicated consultation page on the project website ([www.xlinks.co/devon](http://www.xlinks.co/devon)) and the following deposit points in the local area:

**Table 5: Deposit points**

Venue
Bideford Library, Arts Centre, The Quay, Bideford EX39 2EY
Huntshaw Parish Hall, Huntshaw, Torrington EX38 7HH
Alverdiscott Village Hall, Stoney Cross, Bideford EX39 4PZ
Abbotsham Village Hall, Abbotsham, Bideford EX39 5AP
Devon Mobile Library



Details of opening hours when documents will be able to view at locations in the local area will be available on our website and in the consultation newsletter. Should deposit points be unavailable through circumstances beyond our control, we will consider making alternative arrangements.

Copies of consultation documents on USBs will be made available free of charge, one per household. Hard copies of the consultation booklet, consultation questionnaire and consultation newsletter will also be available on request.

### Responding to the consultation

We welcome feedback on our proposals for the project. Anyone can share their views by:

Completing a consultation questionnaire online at our website.

- Returning a questionnaire to Xlinks Morocco-UK Power Project consultation, FREEPOST SEC NEWGATE UK LOCAL or [hello@xlinks.co](mailto:hello@xlinks.co)
- Submitting their comments by email to [hello@xlinks.co](mailto:hello@xlinks.co) or in writing to the above Freepost address.

Responses must be received by the consultation deadline of 23:59 on **END DATE**.

### How we will consider the responses

Following the statutory consultation, we will consider all the views that we receive and continue to develop our design for the project ahead of submitting our DCO application to the Secretary of State. Our DCO application will include a Consultation Report setting out how we have had regard to all responses received.

Any comments received will be collected and processed by Xlinks and its appointed agents in accordance with its privacy policy: <https://xlinks.co/privacy-policy/> and the relevant data protection legislation. However, please be aware that responses will be used in connection with the application and that copies may be made available in due course to the Secretary of State, PINS and made public. PINS has also published details of how it manages comments received in a Privacy Notice available on its website: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/879604/Privacy\\_Notice\\_Final\\_15042020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/879604/Privacy_Notice_Final_15042020.pdf)

### Further consultation (if applicable)

If, following the statutory consultation, we consider it to be necessary to undertake further targeted statutory consultation, this would be undertaken, so far as relevant and proportionate, in accordance with the principles and methods set out in this SoCC.

### Further information

For further information, please contact us on:

Post: Xlinks Morocco-UK Power Project consultation, FREEPOST SEC NEWGATE UK LOCAL  
Email: [hello@xlinks.co](mailto:hello@xlinks.co)



Phone: 01271 268830

# 2 LETTERS TO LOCAL AUTHORITIES CONSULTING THEM ON THE DRAFT STATEMENT OF COMMUNITY CONSULTATION

## 2.1 Devon County Council



Douglas Johnson

To: Emily Harper; Lucy Freeman; Mike Deaton  
Cc: Emma-Jane Hayward; Kate Broad; Daisy Bowmer; Barnaby Grubb

Reply Reply all Forward ...  
Mon 25/03/2024 12:32



2 attachments (1 MB) Save All Attachments

Dear Emily,

Thank you for your comments below. We have now updated the draft SoCC and are in a position to consult your Council formally on this document in accordance with section 47 of the Planning Act 2008.

Please find an updated copy attached, along with a list setting out the seldom-heard groups we plan to consult. We would be grateful for any comments by **22 April 2024**.

We currently plan to conduct the consultation from 16 May to 27 June 2024, with consultation events taking place in the first two weeks of this period.

Should this change, we will notify you as soon as possible. We would look to maintain a six-week consultation period.

We are conscious you have already seen an early copy of the SoCC and may not have any further comments – if this is the case, it would be helpful if you could confirm this by way of reply.

Please do also let us know if it would be helpful to discuss any aspect of the draft SoCC in more detail.

Best regards,

Douglas

Douglas Johnson | Director, Advocacy

D: +44 [REDACTED]  
M: +44 [REDACTED]

14 Greville Street  
London  
EC1N 8SB



## 2.2 Torridge District Council

Xlinks Morocco-UK Power Project - draft Statement of Community Consultation

Xlinks...250424.docx Xlinks...ATION.docx

**DJ Douglas Johnson**  
To: Helen Smith  
Cc: Kristian Evely, Ryan Steppel, Lucy Freeman, Emma-Jane Hayward  
Mon 25/03/2024 12:30

Xlinks MUPP - seldom heard co... 23 KB  
Xlinks - Morocco-UK Power Pro... 1 MB

2 attachments (1 MB) Save All Attachments

Dear Helen,

I'm getting in touch with an updated copy of the draft Statement of Community Consultation for the Xlinks Morocco-UK Power Project.

We are grateful for your review of an early copy of the SoCC and our subsequent call in December 2023. We have updated the draft to reflect our discussion.

We are now in a position to consult your council formally on this document in accordance with section 47 of the Planning Act 2008.

Please find an updated copy attached, along with a list setting out the seldom-heard groups we plan to consult. We would be grateful for any comments by **22 April 2024**.

We currently plan to conduct the consultation from 16 May to 27 June 2024, with consultation events taking place in the first two weeks of this period.

Should this change, we will notify you as soon as possible. We would look to maintain a six-week consultation period.

We are conscious you have already seen an early copy of the SoCC and may not have any further comments - if this is the case, it would be helpful if you could confirm this by way of reply.

Please do also let us know if it would be helpful to discuss any aspect of the draft SoCC in more detail.

Best regards,

Douglas  
**Douglas Johnson** | Director, Advocacy  
D: +44 [REDACTED]  
M: +44 [REDACTED]  
14 Greville Street  
London  
EC1N 8SB

## 2.3 North Devon Council

Xlinks Morocco-UK Power Project - draft Statement of Community Consultation

Xlinks...ATION.docx Xlinks...250424.docx

**DJ Douglas Johnson**  
To: [REDACTED]@northdevon.gov.uk <[REDACTED]@northdevon.gov.uk>  
Cc: Lucy Freeman, Emma-Jane Hayward  
Mon 25/03/2024 12:37

Xlinks - Morocco-UK Power Pro... 1 MB  
Xlinks MUPP - seldom heard co... 23 KB

2 attachments (1 MB) Save All Attachments

Dear Sarah Jane,

I'm getting in touch on behalf of Xlinks to seek North Devon Council's feedback on our proposed approach to consultation on the Xlinks Morocco-UK Power Project.

We are required to publish a document called a Statement of Community Consultation in advance of our statutory consultation on the project, setting out how we will consult with the community.

While there is not a statutory requirement to consult North Devon Council on this document, we would be very grateful for any feedback that the Council does have on our proposed approach to consultation.

I have attached a draft copy of the Statement of Community Consultation, along with a list setting out the seldom-heard groups we plan to consult. We would be grateful for any comments by **22 April 2024**.

We currently plan to conduct the consultation from 16 May to 27 June 2024, with consultation events taking place in the first two weeks of this period.

Should this change, we will notify you as soon as possible. We would look to maintain a six-week consultation period.

Please do also let us know if it would be helpful to discuss any aspect of the draft SoCC in more detail.

Best regards,

Douglas  
**Douglas Johnson** | Director, Advocacy  
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M: +44 [REDACTED]  
14 Greville Street  
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# 3 LOCAL AUTHORITY RESPONSES TO CONSULTATION ON THE DRAFT STATEMENT OF COMMUNITY CONSULTATION

## 3.1 Devon County Council

### 3.1.1 Comments on pre-consultation early draft of the Statement of Community Consultation

**From:** Emily Harper <[redacted]>  
**Sent:** Thursday, February 22, 2024 8:59 AM  
**To:** Lucy Freeman <[redacted]>; Mike Deaton <[redacted]>;  
**Cc:** Emma-Jane Hayward <[redacted]>; Douglas Johnson <[redacted]>; Kate Broad <[redacted]>; Daisy Bowmer <[redacted]>; Barnaby Grubb <[redacted]>  
**Subject:** RE: Morocco to UK Power Project - Statement of Community Consultation (SoCC)

You don't often get email from [redacted]@devon.gov.uk. [Learn why this is important](#)  
Good morning Lucy

Apologies for the delay in getting back to you. Devon County Council has reviewed the draft Statement of Community Consultation and has the following comments:

- The use of diagrams, maps etc in the SoCC and future consultation documents to establish the context of the proposal and the NSIP process is encouraged;
- Table 3:
  - Page 9 states that a newsletter will be sent to consultees in Zone 1, but on page 11, bullet point 4 states that Zones 1 and 2 will receive newsletters so this needs to be adjusted. It is recommended that Table 3 is edited to show Zone 2 as receivers on newsletters;
  - Is a minimum of one public exhibition sufficient given the scale and that that the proposal covers? It is considered public exhibitions should cover different days/times to provide opportunity for those who cannot attend the one exhibition. The document details of 4 exhibitions so it is unclear why a minimum of one is listed in any case;
  - Direct engagement is offered to community and voluntary organisations, should parish councils within Zones 1 & 2 also be offered direct engagement?
- The statement refers to 'Deposit points' multiple times, it would be beneficial to clarify what these are and the purpose of them;
- The use of social media should be considered to publicise and attract engagement with the project – at present, the statement only looks to utilise social media platforms of other organisations.

I hope the above comments are helpful. If you have any questions, please let me know.

Thanks  
Emily

Emily Harper (she/her)  
Principal Planning Officer  
Climate Change, Environment and Transport  
Devon County Council  
Room 120, County Hall, Exeter, EX2 4QD

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### 3.1.2 Comments on consultation version of the draft Statement of Community Consultation

RE: Morocco to UK Power Project - Statement of Community Consultation (SoCC)

 Barnaby Grubb <[redacted]@devon.gov.uk>  
To:  Douglas Johnson;  Emily Harper;  Lucy Freeman  
Cc:  Emma-Jane Hayward;  Kate Broad;  Daisy Bowmer

 Reply  Reply All  Forward    
Mon 15/04/2024 09:16

-  Xlinks MUPP - seldom heard consultee list - 250424.docx  
24 KB
-  Xlinks - Morocco-UK Power Project - Statement of Community Consultation - FOR LOCAL AUTHORITY CONSULTATION.docx  
1 MB

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Good morning Douglas,

Many thanks for the updated draft SoCC, attached above. Please find our additional comments below:

- We acknowledge that you have now increased the number of planned exhibition events but we would like reiterate that these events are planned to be held at different dates and times to cater for everyone and that this is set out in writing within the SoCC itself;
- Table 3:
  - We would recommend that you host more than a minimum of one webinar and in addition provide details of the content/ agenda of the webinar itself, i.e. will it just be a slideshow/ presentation, will it have a Q&A sessions? If that is the case then we would ask that it is made clear that the webinar is recorded and made available to everyone with the opportunity for members of the public etc to retrospectively submit any questions they may have.
  - Please could you clarify within the SoCC what the difference will be between a public exhibition event and a public consultation event?
  - We appreciate the provision of a public consultation event regarding the offshore elements, however as it is planned that this event will cover Zone 4, X Links need to explain how and be confident that this one public consultation will reach everyone concerned in relation to the offshore elements.
- Seldom heard consultee list:
  - The SoCC needs to make it clear if all these groups are to be contacted as part of the consultation process and if so, how they will be consulted? We note that Page 12 states that organisations within Zone's 1 and 2 will be offered direct engagement but it is unclear which of the groups in the consultee list will be consulted.
  - Organisations such as RNIB and RNID are national charities, the SoCC needs to clarify how any consultation will ensure that the appropriate/ relevant local and regional groups are reached?

I hope that all makes sense but if you have any questions then please let me know.

Barney Grubb (He / Him)  
Senior Planning Officer  
Climate Change, Environment & Transport  
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## 3.2 North Devon Council

Xlinks - draft SCC



Ken Miles <[redacted]@northdevon.gov.uk>

To: Douglas Johnson

Follow up.

Reply Reply All Forward

Mon 08/04/2024 13:56

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Dear Douglas,

Thank you for consulting the council on the draft SCC. The District Council's main concern was to ensure that consultation didn't simply stop at the TDC boundary and so I am pleased to see that it doesn't. Can you let me know why 1.5 miles has been chosen to define the consultation group though please. The document also refers to using the Devon Mobile Library service but this has now been withdrawn.

I look forward to hearing from you.

Ken Miles

Ken Miles (he/him)  
Chief Executive  
North Devon Council

@northdevon.gov.uk

## 4 REGARD HAD TO LOCAL AUTHORITY RESPONSES TO THE DRAFT STATEMENT OF COMMUNITY CONSULTATION

### 4.1.1 Regard had to comments on pre-consultation early draft of the Statement of Community Consultation

Local authority	Issue raised	Regard had
Devon County Council	The use of diagrams, maps etc in the SoCC and future consultation documents to establish the context of the proposal and the NSIP process is encouraged.	Diagrams are included at figures 1, 2 and 3 in the SoCC to explain the planning process and the proposals. Further use will be made throughout consultation materials.
Devon County Council	It is recommended that Table 3 is edited to show Zone 2 as receivers on newsletters.	Table 3 was updated to reflect this comment.
Devon County Council	Table 3 should be clearer that more than one exhibition is planned.	Table 3 was updated to reflect this comment
Devon County Council	Direct engagement is offered to community and voluntary organisations, should parish councils within Zones 1 & 2 also be offered direct engagement?	Yes – Table 3 was updated to reflect this comment.
Devon County Council	The SoCC should be clearer about the purpose of deposit points.	These are places in and around consultation zones 1 and 2 where consultation documents will be made available to view. The language in the section on consultation materials and around the list of deposit points has been updated to make this clear.
Devon County Council	The use of social media should be considered to publicise and attract engagement with the project – at present, the statement only looks to utilise social media platforms of other organisations	Table 3 was updated to make it clear that the consultation will be publicised through social media advertising to attract engagement with the consultation.
Torrige District Council	More detail should be provided on how Xlinks will respond to consultation feedback.	Additional detail was provided in pages 8 and 9 of the SoCC on the Planning Act 2008 and consultation.



Devon County Council and Torridge District Council	More detail should be provided on the seldom heard groups that will be consulted. This should include local authority economic development teams.	The Applicant shared a list of seldom heard groups proposed to be consulted with Torridge District Council, Devon County Council and North Devon Council. This includes local authority economic development teams.
Torridge District Council	Consultation could inform legacy points for the project.	This was agreed and considered to be within the scope of 'short and long term effects' set out in the 'What will we be consulting on?' section below.

### 4.1.2 Regard had to comments on consultation version of the draft Statement of Community Consultation

Council	Comment	Regard had
Devon County Council	We acknowledge that you have now increased the number of planned exhibition events but we would like reiterate that these events are planned to be held at different dates and times to cater for everyone and that this is set out in writing within the SoCC itself	The Applicant included scheduled times for events in the published SoCC. These were at different times and dates.
Devon County Council	We would recommend that you host more than a minimum of one webinar and in addition provide details of the content/ agenda of the webinar itself, i.e. will it just be a slideshow/ presentation, will it have a Q&A sessions? If that is the case then we would ask that it is made clear that the webinar is recorded and made available to everyone with the opportunity for members of the public etc to retrospectively submit any questions they may have.	The Applicant scheduled an additional webinar during the consultation period. The SoCC noted that the webinars would include a presentation and a Q&A session. Contact details for questions were provided within the SoCC and on all other consultation materials. Webinars were recorded and made available via the Applicant's website.
Devon County Council	Please could you clarify within the SoCC what the difference will be between a public exhibition event and a public consultation event?	The Applicant included the following text in the SoCC: 'Public consultation event refers to all events taking place during the consultation, including exhibitions and webinars. Public exhibitions refers to in-person, drop-in information events.'
Devon County Council	We appreciate the provision of a public consultation event regarding the offshore elements, however as it is planned that this	The Applicant included the following text in the SoCC: 'We will promote this event directly to marine users by email and post, as well as publicising it in the Fishing News

	<p>event will cover Zone 4, X Links need to explain how and be confident that this one public consultation will reach everyone concerned in relation to the offshore elements.</p>	<p>and Lloyds List.’ This approach was to ensure that everyone concerned in relation to the offshore elements was reached.</p>
<p>Devon County Council</p>	<p>The SoCC needs to make it clear if all these groups are to be contacted as part of the consultation process and if so, how they will be consulted? We note that Page 12 states that organisations within Zone’s 1 and 2 will be offered direct engagement but it is unclear which of the groups in the consultee list will be consulted.</p>	<p>The SoCC confirmed that the Applicant would contact the groups identified in Appendix 1 directly to invite them take part in the consultation.</p>
<p>Devon County Council</p>	<p>Organisations such as RNIB and RNID are national charities, the SoCC needs to clarify how any consultation will ensure that the appropriate/ relevant local and regional groups are reached?</p>	<p>The Applicant included a range of identified local and regional groups in Appendix 1 of the SoCC. This included contacting the regional branches of national charities.</p>
<p>North Devon Council</p>	<p>The District Council’s main concern was to ensure that consultation didn’t simply stop at the TDC boundary and so I am pleased to see that it doesn’t.</p>	<p>This is noted.</p>
<p>North Devon Council</p>	<p>Can you let me know why 1.5miles has been chosen to define the consultation group though please.</p>	<p>The 1.5 mile radius around the converter station site is based on that used at previous rounds of consultation and is designed to ensure those potentially directly affected by this aspect of development are consulted, taking into account our EIA to date.</p>
<p>North Devon Council</p>	<p>The document also refers to using the Devon Mobile Library service but this have now been withdrawn.</p>	<p>The Applicant replaced Devon Mobile Library with Northam Library.</p>