



Date: July 2024

XLinks Morocco-UK Power Project

Representations submitted on behalf of Torridge District Council to the Preliminary Environmental Information Report (PEIR)

It is noted that the PEIR provides the preliminary findings of the Environmental Impact Assessment (EIA) process undertaken to date to support the pre-application consultation activities required under the Planning Act 2008.

The PEIR has been reviewed by Torridge District Council Officers insofar as topic areas that relate to the Council's functions, namely: Planning, Economic Development, Sustainability, Environmental Protection, Human Health, Landscape and Historic Environment. Given the ongoing nature of the pre-application stage, and the programmed meetings on specific topics over the coming months, the Council wishes to emphasise that the comments provided below are made proportionately to and in recognition of the PEIR being a summary of the findings as of May 2024. Any comments are made with the expectation that the points raised will be discussed and explored in upcoming meetings. Furthermore, it is expected that further matters may be raised through the ongoing consultation stage as more information becomes available.

The Council is working closely with Devon County Council and notes that certain technical matters fall within their remit, such as transport, drainage and archaeology. Given this, the Council defers to the formal Representation of Devon County Council on these matters but wishes to emphasise the joint ongoing nature of the pre-application engagement meaning the Council will wish to be involved in highway discussions, for example, moving forward.

The Comments made at this stage are set out under the relevant Chapter headings and associated paragraph numbers for ease of reference.

Project Description

Paragraph 3.69 and Plate 3.1 (Indicative Construction Programme) identifies that the construction process for 'Bipole 1' is due to commence in 2027/2028 and 'Bipole 2' is due to commence in 2030/2031. The Programme sets out that the landfall compound and associated access will be 'de-mobilised with the removal of all construction equipment but will remain fenced and secured until the completion of Bipole 2, when further construction work is required at landfall'. Part of the Bipole route is located within the AONB/National Landscape and is also visible from the Coast Path. The supporting documentation identifies a development lag between Bipole 1 and Bipole 2 of approximately two-three years. Such a development lag requires justification as it needs to be demonstrated why all the cabling (particularly the areas within/or in sight from the AONB/National Landscape) cannot be implemented concurrently. In addition, further detail is required about how the 'land' (referenced in 3.69) will be left and maintained within the intervening period.

Paragraph 3.7.16 and 3.7.17 notes the use of ‘cut and fill’ to provide a suitable topography for development and landscape. The Council has previously facilitated dialogue between the Councils external landscape consultant and the developer regarding the design of the project, with landscape being a key factor during such conversations. It is difficult to assess the landscape aspects of the PEIR without detailed drawings, sections, montages etc. The Council understands that the project has been put forward with a ‘maximum design approach’ (*Rochdale*) however this has limited the opportunity to examine the project in a meaningful way. In addition, the PEIR notes the use of a ‘design code’. The use of design coding has not been discussed with the Council ahead of the PEIR – and so remains a surprise admission. Notwithstanding this, the Council would strongly suggest that a design code would be of limited benefit, where the emphasis should be providing a detailed and finalised scheme which produces the least amount of landscape/character impact possible.

Paragraph 3.7.95 provides a ‘*broad sequence*’ of events in the lead-up to cable construction. Sub-section (9) refers to the maintenance covers for access to ‘joint bays’ and ‘link boxes’ – but provides limited information as to the appearance of joint bays. Given the sensitivity to rural locations throughout the district, these should be recessed as much as possible to limit the adverse impact to surrounding character.

Paragraph 3.7.100 details what might be included within a construction compound. There are a number of construction compounds plotted throughout the cable route. The vast majority of compounds will be in the Countryside and thus be prominent by their very nature. Therefore, care should be taken to limit the intrusion caused, particularly at landfall, as it would be visible from the Coast Path.

Need and Alternatives

Section 4.2 (Need for the Proposed Development) sets out the need for the development and refers to National Policy Statements, the UK’s legal climate change commitments, and various policy papers. The PEIR should also reflect on how the project would meet TDC’s obligations regarding climate change and should refer to policies in the adopted Local Plan.

Paragraph 4.462- 4.490 identifies the approach towards designing the project including site selection, landscaping measures, and how X-Links have responded to concerns raised by statutory consultees. The PEIR is silent on the views previously provided by the Local Authority on the matter of site selection, and instead relies more greatly on the engineering rationale, as well as views from a selected number of residents and connection to the Grid. For clarity, the Local Authority previously raised concern with the site currently chosen, as the Huntshaw site would be more sheltered from surrounding viewpoints. Notwithstanding this, the Councils Landscape ‘expert’ has been involved in the detailed design of the scheme which has included discussion on viewpoints and landscaping measures. In the opinion of the Local Authority, a detailed proposal is required in order to respond appropriately to the surrounding landscape and site context. Whilst this part of the PEIR makes effort to demonstrate steps taken in the design stage of the project, the Rochdale method now used is a retrograde step which inhibits the ability for the Local Authority and its consultees to robustly assess the proposals in relation to design, landscape and heritage impacts.

Historic Environment

The information supplied does not give detailed information in relation to the appearance and scale of the transformer building nor the levels for the building. The Route of the cable corridor is not shown in any more detail than the initial enquiry and as such the assessment of visual impact on the setting of heritage assets along this corridor cannot be fully quantified at this stage.

Page 33 – details of the joint bays and ink boxes are not provided. The detail of these features needs to be plotted on the route so that the overall impact on both visual and practical use of the land can be evaluated.

Duration of construction ...what is the definition / quantification of 'short term'

Methodology (2.4, page 15) – noted

Impact Assessment methodology para 2.4.15(page18)-21 - Standard text and noted.

Page 22- para 2.5.2- No designated heritage assets would be directly physically impacted by the construction , operation and maintenance of the Propose Development.

Page 24 para 2.5.7 Archaeology and history - will this be expanded and enhanced?

Page 27- Para 2.14 Maximum design scenario table.

This is where the onshore HVDC cable link boxes and joint bays are noted. The table is noted but details of the linkboxes and joint bays are requested.

Construction compounds – Locations and duration?

Page 30 para 2.7 – Mitigation Measures- Noted

Page 33-Future Monitoring para 2.8.18 – once construction work has been completed there would be no impacts (visual and/or noise) in respect of the settings of the designated heritage assets – can this be stated definitively at this stage?

Para 2.8.21 – Impacts on designated heritage assets as a result of change within their settings during construction would be indirect (non -physical) and short term. – need short term to be quantified in relation to construction and maintenance.

The findings under these paragraphs may be premature given the paucity of detail at this stage.

Para 2.8.28 – the need for lighting on the development for security could impact on the wider landscape.

Page 36 – para 2.8.38 Impact on the Character of the Historic Landscape.

This takes into account hedgebanks but not the cable corridor in terms of use or restrictions in previous farming activity.

Page 49-50 Table 2.17 Summary of potential environmental effects. – Noted but is the historic landscape really a low sensitivity of receptor especially during the construction phase?

Ground Conditions, Noise and Vibration, and Air Quality

Volume 2 Chapter 4 Ground Conditions does include land contamination although the majority of this section discusses ground water impacts which is an area that the Environment Agency would need to provide comment. As you may be aware, the Torridge district has no sites designated as contaminated land however, previous land use may have resulted in potentially contaminated ground conditions that have not been recorded. The proposed development site appears to include areas where there is the potential for land contamination, such as the coal mining seam identified within the PEIR. Whilst the proposed development is not introducing long term sensitive receptors (eg. new dwellings) to the

locality, the disturbance of potentially contaminated sites during construction and the mobilisation of such contamination (eg. ground gas) must be considered. Suitable mitigation measures have been outlined in Table 4.20 however, until a better understanding of the ground conditions are available through intrusive ground works, these mitigation measures should not be considered as complete. Para 4.15 indicates that intrusive works will be undertaken for both engineering and environmental purposes which will better inform the mitigation measures and any remedial works required.

Volume 2 Chapter 6 Noise and Vibration outlines a significant number of noise generating activities both during the construction and operational phases. Whilst some data has been provided on noise impact, it is noted that the layout and location of plant and equipment has not yet been finalised. Initial concern is raised with the amount of high level noise activity, such as HDD and trenching works, that may possibly occur during noise sensitive time periods (ie. night time). Table 6.22 outlines mitigation measures however, several of the measures are to be secured through planning conditions. Whilst it is acknowledged that noise limits, time restrictions and a suitable Construction Environmental Management Plan (CEMP) can be conditioned within the planning consent, there needs to be reliance on robust noise assessments being available to ensure appropriate noise limiting conditions for example. The operational substation suggests a very slight exceedance of noise levels over background at neighbouring dwellings. Despite the low levels, the proposed development should avoid any potential background 'creep' in the locality. Para 6.15 mentions that further baseline surveys will be undertaken to quantify the noise climate on neighbouring amenity. The Environmental Protection Team will require further surveys to be conducted, that accurately evaluate the noise impact, once layout and plant strategy have been finalised. The methodology referenced in the PEIR, in particular BS4142 and BS5228, is relevant.

Volume 2 Chapter 7 discusses the potential air quality impact, with particular relevance to dust emissions on neighbouring amenity from an environmental protection perspective. The proposed development will be carried out over a significant time period and has the potential to impact a considerable number of residential properties. Table 7.21 indicates that a Dust Management Plan (DMP) will be devised to support the CEMP once finalised. The Environmental Protection Team would expect a DMP to be robust and outline suitable measures to mitigate dust during construction. Reference to the IAQM guidance is highly recommended.

In summary, the PEIR covers relevant environmental areas with provision of detailed information. However, further assessment is required to quantify some of the potential impacts to residents and the environment.

Finally, it is worth mentioning that any mitigation being in place does not necessarily remove the possibility of a breach of applicable legislation and subsequent formal action by us if deemed appropriate. Obviously, consideration will be given to best practicable means available to the developer at the time. Demonstrating that adequately applied mitigation measures, identified in assessments and stated in documents (eg. CEMP), will be imperative should the Environmental Protection Team receive and subsequently investigate any complaints pertaining to the above areas.

Land Use and Recreation

Paragraph 8.11.3 – Even though the paragraph highlights that projects and plans includes those identified within the relevant Development Plan (Tier 3), the subsequent table (8.16) does not identify any local plan allocations as part of the potential Cumulative Environmental Assessment. There are a range of development sites allocated within the adopted North Devon and Torridge Local Plan 2011-2031 (www.torridge.gov.uk/ndt1p) that should be

appraised and reviewed as part of this process. An online interactive map that may assist in spatially identifying relevant allocations and associated proposals can be found via www.torridge.gov.uk/ndt1p/maps. Most notably, the Council would draw attention to allocation BID04 - Site South of East-the-Water (www.torridge.gov.uk/ndt1p/bid04) that lies adjacent to the proposed site compound at Gammaton Road, East-the-Water.

Table 8.3 – the identified policies are unlikely to be fully representative of all of the development plan policies relevant to the considerations of the topic in hand. In particular, would suggest that it may be pertinent to review and include references as deemed appropriate to:

- Policy ST02: Mitigating Climate Change – in particular clauses (b), (d) and (e)
- Policy ST07: Spatial Development Strategy for Northern Devon’s Rural Areas
- Policy ST09: Coast and Estuary Strategy – in particular clause (7)
- Policy ST11: Delivering Employment and Economic Development – in particular clauses (3), (6) and (7)
- Policy ST14: Enhancing Environmental Assets – in particular clauses (a), (b), (d) and (h)
- Policy DM01: Amenity Considerations
- Policy DM02: Environmental Protection
- Policy DM03: Construction and Environmental Management
- Policy DM08: Biodiversity and Geodiversity – in particular clause (1)

The Council would highlight that the development plan does not only comprise the North Devon and Torridge Local Plan 2011-2031, but also the adopted Minerals Plan and the Waste Plan, along with a series of neighbourhood plans (although those neighbourhood plans currently made are unlikely to be of direct relevance due to their geographic distance).

Table 8.14 – There is reference to the Wales Coast Path in terms of potential impact. It is assumed that this is a drafting error and that it should rather be the South West Coast Path?

Table 8.15 – There is reference to the Mona Proposed Onshore Development Area, which would appear to be located in North Wales. It is assumed that this is a drafting oversight and it should related to the area of the local Onshore Development Area for the proposed project in Torridge?

Table 8.15 – Welcome the recognition of the importance of mitigating and minimising the impact on soils, given the significance of agriculture to the local area. Important that, where possible, agricultural land is restored so that it can return to productive agricultural use.

Table 8.15 – Welcome the proposal to prepare both an outline and more detailed Public Rights of Way (PRoW) management plan(s). The PRoW network, and in particular the Tarka Trail and South West Coast Path, are important assets and valued both locally and by visitors for their recreation, health and wellbeing value. They are also an economic draw for an area that is renowned for its environmental quality. It is crucial that the programme of works, along with the design of individual work locations and layout of operational compounds, access routes and wider works has regard to minimising disruption to the PRoW network. It is important that consideration is not only afforded to the need for the stopping up or diversion of footways but also the impact of construction activity that could adversely affect the users of the PRoW, as this could have an adverse impact on health & well-being and potentially on the visitor economy – as a result of either perceived or actual deterioration of the environs during construction activity.

8.8.24 The Council is concerned that the conclusion reached on the impact on the Coastal Areas may not take into account the potential for nuisance caused by the noise of construction. The area of coast within which the cable landfall lies is designated as Undeveloped Coast within the adopted development plan (North Devon and Torridge Local Plan 2011-2031), recognising its unspoilt nature. The area tends to be tranquil, so any nearby construction activity has the potential to have an adverse impact on recreational users of the coast by virtue of both noise and visual disruption of the unspoilt landscape. This does not currently appear to be a consideration in the assessment but should however be acknowledged and appraised when determining the magnitude of impact.

8.8.25 As per the comments on Coastal Areas above, the conclusions reached on the potential impact to the Coastal Path and Tarka Trail section of NCR 27 appears to have focused on the notion that there will be no physical impairment to the routes. Whilst this is accepted, it does not however appear to take account of the potential scope for the construction works to have an adverse impact on the experience of the user and the scope for the local environs to be adversely affected by construction activity, due to both noise and visual impact on what is in places an unspoilt and tranquil setting.

8.8.25 / 8.8.26 – this does not take into account any visual blighting or noise disruption that could reasonably impact on the enjoyment of the environs for the users of the routes. Looking simply at the physical disruption to the routes is too simplistic and does not fully appraise the potential impacts. This is of particular concern for the SWCP and other areas that fall within the National Landscape (AONB) and the Undeveloped Coast, recognising that these areas are known for their tranquillity and unspoilt nature. The users of these routes are therefore have the scope to be particularly sensitive receptors to any disruption caused by the works.

8.8.29 – would question the conclusion of low magnitude. Does this not have the potential to have a more disruptive effect, given the nature of the recreational activity – fishing which is renowned for its associated tranquillity? Would question whether this could have a more fundamental impact on the likely usage of the lakes for this activity over the duration of the works, with an associated impact on the host business/ club. It is however recognised that given the fact that activity associated to cable laying is likely to be transient and short-lived.

8.8.32 – the assessment would appear to be too narrow in its scope. This would appear to overlook the potential disruption to users (receptors) from any nearby construction activity – impacting on the enjoyment of the environs and recognising the often tranquil nature of these routes, particularly in the Undeveloped Coast and National Landscape (AONB).

Appendix 5.3 – Table 1.2 - Whilst Development Plan allocations are stated to be screened in to the assessment and search criteria for the CEA long list (onshore) this does not appear to have happened. Table 1.3 identifies that these will be assigned as Tier 3, in terms of assigning uncertainty. No projects appear to have been identified from the adopted Local Plan in Table A.1.

There are likely to be a range of sites allocated in the adopted North Devon and Torridge Local Plan 2011-2031 that fall within the area of search considered for the proposal; including one or more which have the potential to be impacted by, or impact upon, the proposals. The interactive local plan policies map (www.torridge.gov.uk/ndt/p/maps) provides an effective tool for identifying potential local plan allocations and proposals which could fall in scope. The Council would encourage the inclusion and review of all relevant allocations from the development plan that fall within the 10km area of search for the proposal. Most notable is allocation BID04 (www.torridge.gov.uk/ndt/p/bid04) for approximately 600 new dwellings, along with other associated infrastructure, which lies adjacent to the

proposed main site compound at the top of East-the-Water on Gammaton Road. Concerns that the location and operation of this compound could prejudice the likelihood of the allocation coming forward in the short to medium term, or that if it should proceed, then the location of the compound could cause amenity issues with future occupiers of new dwellings that could be located adjacent to the proposed compound. This could also result in noise complaints which have the potential to prejudice construction operations. Would highlight that development of the allocation is likely to have to take place in an east-to-west direction due to the availability of highway access, which is anticipated to be formed onto Gammaton Road. Should widening works be undertaken to Gammaton Road, along the stretch of highway close to the junction with Manteo Way, the proposals should be mindful as to the future likely requirements for the formation of a highway access to land to the south and east to service significant residential development.

The Council has concerns that the proposed cable corridor has the potential to prejudice the opportunity to accommodate necessary future strategic growth of Bideford in the medium to long term. Whilst the proposed cable corridor avoids land allocated for future growth within the adopted North Devon and Torridge Local Plan 2011-2031, it encircles Bideford to the West and South in relative close proximity to the existing and proposed built form of the settlement. Given that Bideford is the largest settlement in the District, identified as the Strategic Centre within the adopted North Devon and Torridge Local Plan and is one of the most sustainable locations in northern Devon to accommodate growth, it is important to safeguard opportunities for its ongoing strategic growth in the future.

Without prejudice to establishing future locations for accommodating such growth, the Council is concerned that the route of the cable corridor could constrain the potential to do so. Most notably, the Council is concerned about the proximity of the corridor to the west, near to Abbotsham Cross Roundabout and to the South of East-the-Water.

Specifically in relation to Abbotsham Cross Roundabout, the Council notes from the Land Use Plans (Sheet 6) that there is an intention to acquire permanent rights for a strip of land that extends along the road frontage to the south of the A39, a small section to the south and west of Clovelly Road and to the west of the highway heading south towards High Park Farm. There is concern that this could in effect sterilise any future potential opportunities for future built development in this location, in particular precluding the provision of an appropriate highway access to the site. Similarly, there are concerns of the relative proximity of the cable corridor in this location, being only approximately 300-400m to the west of the roundabout and the extent of the currently planned built form of the town. Given the area's relationship to the existing and proposed built form, this is a location that could conceivably, and without prejudice, be in a location that could be logically reviewed to accommodate future growth.

Similarly, the proximity of the cable corridor proposed to run to the south of the existing and planned built form to the south of East-the-Water, raises concerns about the potential scope to accommodate future strategic growth of the town in this location; with the corridor being less than 200m to the south of the land currently allocated for planned housing growth. As per the land near to Abbotsham Cross Roundabout, this could conceivably be, without prejudice, a location that could be logically reviewed to accommodate future growth.

Climate Change

Vol 4 Chapter 1 GHG Technical Report: includes an assessment of both UK and Morocco operations so would seem to fit with yesterday's ruling/train of thought about how carbon emissions should be looked at in planning and EIA.

Vol 4 Chapter 2 Climate Change Risk Assessment:

In general would be good if this Chapter could refer to the Devon, Cornwall and Isles of Scilly Adaptation Strategy, and in particular their risk register <https://www.climateresilient-dcios.org.uk/view-adaptation-strategy/>

Para 1.5.2 Query as to why UKCP Regional 12km projections weren't used for the onshore climate projections, given these are recommended when local scales are essential – they better represent local effects due to land elevation, coastlines and surface characteristics. Would also suggest UK CP Local (2.2km) projections should be included for the convertor site.

Table 1.5 Wildfire doesn't appear to have been considered as a climate risk. Given the increasing number of incidents we are seeing in northern Devon, I think it should be included for convertor construction and operation. Note that convertors have a fire risk which will presumably be covered somewhere in the planning application (albeit not in the PEIR?) Could be 'interesting' fighting a large convertor fire given their location...

Landscape, Seascape and Visual Resources

This section of the Representation has been prepared by David Wilson Partnership by and under the supervision of Peter Leaver, a director of the company and chartered member of the Landscape Institute. David Wilson Partnership have expertise of preparing LVIA for housing and other developments and of reviewing LVIA for local authority clients.

The proposals are for a cable landfall at Cornborough, a cable route to Alverdiscott, a large converter station development near the existing Alverdiscott sub station and an extension to the existing substation.

This preliminary review highlights the main landscape and visual issues connected with the X Links development proposal. There are a number of areas where further discussion / clarification / scheme development will benefit the application.

Very little detail on the specifics of the proposals has been made available as part of the PEIR and assumptions have been made as a result on factors such as visibility, effect of mitigation and effects on landscape elements. Assessments should therefore be treated with some caution and their "preliminary" nature is stressed. The assumptions made by the assessors are based on a "maximum Design Scenario", which allows for 2 convertor buildings at 26m height, 373,000sqm total footprint and a 2.8ha substation. Significant adverse landscape / visual effects are predicted for the landfall, cable route and converter station elements of the scheme during the construction phase of the project. Adverse landscape and visual effects are predicted for the operational phase of the development, but the PEIR does not predict any of these to be significant. Our view is that development of site layout, a mitigation strategy and building design is necessary in order to test this assertion.

Preliminary Review of Seascape, Landscape and Visual Impact Assessment

SLVIA Methodology

Assessments of seascape, landscape and visual effect are made by combining judgements on the value, condition and susceptibility of a receptor to change (Sensitivity) with judgements on the scale of change, its geographical extent and its duration/reversibility (magnitude of change). Volume 4 Appendix 2.4 of the PEIR sets out the methodology used in making these judgements and how they are combined to determine whether the effect of development will be significant or not.

We have identified a number of minor areas where clarification would be helpful in understanding how the methodology has been used in the assessment of effects. These cover the areas of the weighting given to judgements of duration and geographical extent of effects, how landscape value is assessed outside the National Landscape and the threshold for an effect to be considered significant.

Baseline Studies

Appendices 2.2 and 2.3 of Volume 4 detail the landscape and visual baseline conditions. The landscape / seascape baseline report takes account of the relevant national, countywide and local character assessments and the relevant national and local guidance. There are a small number of very minor clarifications required, but on the whole the baseline studies are comprehensive.

The Visual baseline study and representative viewpoints were agreed as part of the previous PPA and have been carried through into the current PEIR. We believe that all visual receptors and viewpoint situations have been addressed.

The ZTV map identifies an area of potential visibility generally eastwards of a line running north – south through the site. The main areas of potential visibility stretch 4km north, south and east of the site, with more isolated areas of visibility to the west (around Rickards Down) south west of Torrington and high ground south of Codden Hill.

A broadly representative range of viewpoints have been selected within this area and additional viewpoints suggested at the previous PPA stage have been included. These include:

Codden Hill – The only identified OS Viewpoint in the study area with potential visibility of the proposals. It is a popular destination locally.

Rickards Down – There are long views inland from field entrances at and near the crossroads.

Rickards Down is representative of potential views from within the Northern Devon National Landscape.

Area around Lovacott Green – To fill a gap in viewpoint coverage from lanes and paths in this area.

Landscape and Visual Effects

Very little detail on the specifics of the proposals has been made available as part of the PEIR and assumptions have been made as a result on factors such as visibility, effect of mitigation and effects on landscape elements. Assessments should therefore be treated with some caution and their “preliminary” nature is stressed. The preliminary assessments are helpful in identifying areas where further design work and mitigation strategies are necessary in order to minimise potential adverse effects.

Construction Effects: Visual Effects:

Significant visual effects are predicted where public rights of way cross the cable route. Both the South West Coast Path and National Cycle Network (Tarka Trail) routes cross the cable route. An issue that will require further consultation is how temporary significant visual effects on these two major routes will be avoided.

Significant visual effects are predicted for people walking on paths and lanes with views of the converter station construction site. Effects on views from Gammaton Moor, Webbery Cross and viewpoints within around 2km of the site are predicted to be significant adverse.

Further development of the construction management plan could address how much scope there is for mitigating these effects during the construction phase.

Construction Effects: Landscape Effects

Significant and not significant moderate adverse temporary effects are predicted to landscape character areas and character types along the cable route and the cable landfall. At the Landfall adverse effects are predicted to the quality of tranquillity on the undeveloped coast. We would expect further development of the construction management plan to explore how these inevitable effects could be mitigated so that it is the smallest possible area that is affected.

On the cable route, significant adverse effects are predicted in areas where the cable route will cut through hedgebanks and sunken lanes. A cable corridor has been proposed, but a more detailed exploration of crossing points of lanes and hedge boundaries and exploration of non-trenching cabling techniques could mitigate the worst effects of the cable construction.

Operational Effects: Landscape Effects

Once the cable is laid and landscape restoration work is completed, there will be no significant adverse effects of the cable corridor on the landscape of the study area.

The converter station and associated earthworks will result in some long term and permanent adverse effects. While it is acknowledged that the converters are sited in a landscape that is already characterised by electricity generating infrastructure, their scale and materiality is at odds with existing developments. Features of the Converter Station that will contribute to their effect on landscape character include the bulk and size of buildings, without much context in the local area, their siting on high ground, prominent in views from the south and east and the form of the earth bunding that is suggested around them.

Mitigating measures are suggested, including setting the buildings in the ground, extensive earth mounding, tree planting and a commitment to work with the local authority on the colour palette to be used in the buildings. Some positive steps had been taken towards a detailed mitigation strategy as part of the previous PPA, as summarised in section 2.7 of the SLVIA (Vol.4 Ch2 pp82-84). The submitted site layouts do not include details of how or where the mitigation strategy is to be applied. Further design development during the pre planning period will be necessary in order to make sure that permanent, significant adverse landscape and visual effects are minimised.

Significant adverse effects are predicted on particular characteristics of the host landscape, as a result of changes to the pastoral character of the landscape and the effect of the development on the elevated ridges that are characteristic of the overall area. Moderate adverse effects are predicted on other landscape characteristics and qualities, including localised effects on hedgerows and field boundaries. The SLVIA does not predict overall significant landscape effects as a result of the proposal.

These assessments will be reviewed as part of the PPA process and in the light of clarifications on assessment methodology.

Operation Effects: Visual Effects

The SLVIA contains a limited series of visualisations, as the detail of the proposals and mitigation is still at an early stage. Visualisations are from higher sensitivity viewpoints. Locations are reasonably representative of the range of views of the site from a spread of geographical directions. Visualisations as submitted are not based on a final layout, are not fully rendered and have made no allowance has been made for mitigating plant growth. The

visualisations illustrate a number of issues for consideration in design development of the proposals:

Siting on a local high spot increases the extent over which the development exerts a visual influence. Mitigation has to work harder to reduce visual impacts (e.g. VP29).

The extent of the site and scale of the structures is out of context in the local landscape. The site is very large in comparison with farmsteads in the same view (e.g. VP32). Existing hedgerow trees are lower than the roofline of the proposed buildings (e.g. VP33).

Mitigation by mounding is effective in reducing influence on views where the buildings are on the skyline, but judgement is needed as to how high the mounding could go before it becomes an obtrusive landscape element itself.

The PEIR predicts major adverse effects to views from the lane to the west of the site. Moderate adverse effects are predicted from views to the north, east and south of the site up to about 3km distance. These effects are predicted to decrease with time, as mitigating planting matures. Our own view is that the development and the proposed mounding will markedly change the character and quality of views in an area up to 3km from the site. The extent to which proposals can be integrated into the landscape and their level of significance will very much depend on decisions made during the design stage of the project.

Cumulative Effects

Two Solar PV farms are considered as part of an assessment of cumulative effects. Cumulative effects are not considered to be significant.

Next Steps

The preliminary SLVIA is a helpful document on which to base further design development, site layout and a construction management plan. Although there are a few minor areas where clarification is required from the applicants, the SLVIA provides a useful assessment of the main areas where major and moderate adverse are likely to occur. It will help to focus development of the mitigation strategy to minimise significant landscape and visual effects.

Socio-economics and Tourism (Economic Development)

Paragraph 3.46 – 3.4.13 (Study Area)

Could this be clarified, please? It seems to indicate that consideration is only being given to tourism receptors (not the most accessible of terms) within 10km. Yet when discussion takes place around negative impact on tourism accommodation within the region, including that accommodation being used for Xlinks purposes rather than tourists, much of that will inevitably take place in areas such as Appledore, Westward Ho! and Barnstaple- beyond that 10km radius.

Table 3.6: Definition of magnitude for economic impacts

Focus: 1% GVA impact = high

This is quite clever economics but could also be seen as being reasonably unambitious - what is the industry standard is on this.

Paragraph 3.4.75-3.4.79 (Assumptions and Limitations of the Assessment)

A real concern that all of this information is based on partial data / other examples and not accurate projections of the full XLinks cost. Although that is understandable it would be useful to know in more detail what these other projects (general industry data) related to as this is very much not a common case with direct comparators. Slightly mitigated by 3.8.8 - 3.8.11 but pinch of salt required nonetheless given the geographical situation and challenges.

Paragraph 3.5.14 (Industrial Structure)

This seems inaccurate. Both 13.3% and 12.5% are lower than 13.9% - 13.3% (UK Average) is NOT higher.

Paragraph 3.5.25

The key indicator is actually the ratio average earnings: house price, the figure itself of average house price does not necessarily demonstrate much.

Paragraph 3.5.27-3.5.2.9

The value of tourism across Torridge and North Devon varies wildly. The value in Torridge is less than the value in Mortehoe, for example. We have visitor value data up to 2022. Use of 2019 as a baseline figure is slightly risky as it does not necessarily correlate to tourism value or trends in 2024 following so many upheavals in the sector during the intervening period. An argument can be seen where negative impact figures are presented against the overall size of the tourism industry and seen as being quite low- but would figures for Woolacombe / Saunton etc be relevant (just as would Westward Ho! be relevant for White Cross?). This is again the case for 3.5.34

Table 3.28: Local Area, Top Visitor Attractions

This is a questionable list. No Milky Way but "Church of St Margaret of Antioch" included. Also, no Hartland, nor any of the North Devon attractions. RND Golf Club?

Table 3.32: Maximum design scenario considered for the assessment of potential impacts

Has any form of "meet the buyer" event been discussed? There are a lot of hidden, incredibly high-quality businesses who might surprise. For example, TCi in Barnstaple was a Tier 1 at Hinckley C yet could easily be overlooked simply for lack of awareness, likewise local cable laying and repair business who work on international interconnectors already but don't have local visibility.

This should be an early priority to enable ramping up of capabilities in line with work already being undertaken for Celtic Sea FLOW preparations, with the 2 skillsets closely aligning enabling shared benefits rather than competition for workforce.

Paragraph 3.7.8

This is welcomed - but we would hope this could be done in coordination with Petroc and TDC Economic Development team to also align with future FLOW skills' needs, for example.

Paragraph 3.8.15

The example of EDF at Hinkley Point C is a good one to follow. They committed to a far greater proportion of local spend than this and invested in local supply chain development during project gestation with a commitment to leaving a real local legacy. The Council calls upon XLinks to engage with Hinkley C and understand those processes as well as the benefits and ultimate cost-savings which have been achieved as a result.

Paragraph 3.8.18

Which section is the 371km referring to? The whole length is considerably more than that.

Paragraph 3.8.22

The Council, and DLUHC, would very much challenge that this statement is correct for Torridge, hence the highlighting of the current challenge of the Levelling Up Partnership award. This is the danger of simply looking at North Devon and Torridge, where Torridge is the direct local area.

Paragraph 3.8.27-29

Very disappointing, hence the need for early supply chain development locally – re: *employment figures*.

Paragraph 3.8.59 – Out of area workforce impact on accommodation

Similar to earlier points this links to minimising out-of-area procurement where possible and developing the local supply chain early in this process.

Paragraph 3.8.61

This proportion is simply not acceptable and seems to indicate a complete lack of engagement with local suppliers and workforce.

Paragraph 3.8.68

This could be hugely damaging to the local sector. Many of these businesses shut to recuperate during winter months when supposed balancing impacts could be achieved.

Paragraph 3.8.69-3.8.70 - Magnitude on tourism = Low

The Council would significantly challenge this logic. These are small, independent businesses who live on tight margins. The negative impact indicated would potentially not only impact on a short term but also longer term. For example, families who always come here deciding to holiday elsewhere. Shops closed and becoming vacant, or hospitality options lost. All with local psychology and place momentum impacts.

Paragraph 3.8.74 – Impact on house prices

This is another major concern. The house price to average earnings ratio is already hugely challenging for the local workforce.

Table 3.49 – Offshore O&M

Why is no spend proposed or considered for the Local Area here despite maritime and offshore strengths, especially aligning with FLOW skills and workforce requirements (including vessels where looking at cables)

Paragraph 3.9.13

As per the earlier points above, the Council would significantly challenge this assertion. The lack of local construction workers, requiring significant use of local tourism accommodation and its detrimental impact on the wider economy, including retail and hospitality, undoubtedly requires mitigation. The clearest mitigation is therefore early investment in developing a local supply chain to overcome this issue whilst also increasing social value impacts.

Paragraph 3.9.15

Again, this feels like it is implying there aren't really any offshore impacts here despite the fact that there is a clear implication that the initial phase will undoubtedly linger more in the waters off Torridge compared to anywhere else due to the nature of connecting the cable into land.

Paragraph 3.9.35

As per the earlier points raised, the Council would significantly challenge this assertion. The lack of local construction workers, requiring significant use of local tourism accommodation and its detrimental impact on the wider economy, including retail and hospitality, undoubtedly requires mitigation. The clearest mitigation is therefore early investment in developing a local supply chain to overcome this issue whilst also increasing social value impacts.

Paragraph 3.9.41

Agreed. However, important to note that this does not per se counterbalance negatives to the local economy which should be mitigated against as part of the project development rather than sidestepped. Developing the local supply chain to achieve those benefits should be considered best practice.

Table 3.56

This is indeed true. However, this document has indicated that limited supply chain development will be undertaken and therefore it is hard to justify this statement.

Paragraph 3.11.7 and Paragraph 3.11.11

Yet this is not being done, as indicated in this report.

Paragraph 3.11.21

Interesting that this GVA impact of offshore wind is picked up on in this report as it is not so clear where the XLinks GVA impact would actually come from for the Local Area given the limited spend and employment opportunities, especially during the construction phase, which also puts other local jobs at risk, as indicated by the impact on tourism and connected spend.

Other comments:

The use of a 10k radius vs data and stats from Torridge and North Devon feels a strange balance.

Socio-economics and Tourism (Planning Policy)

3.5.23 & Table 3.26 – Would suggest that the current baseline metrics are inadequate. To understand the affordability of housing, it is important to not only look at house prices but to look at the interplay between household income and house prices. This provides a more valuable insight into affordability that reflects local circumstances. Equally, it is not only appropriate to look at average income and house prices, but rather also the relationship between lower quartile incomes and house prices. Would suggest that the [ONS House price to workplace-based earnings ratios](#) are utilised to provide more appropriate and effective metrics. For the private rented sector, an understanding can be obtained by analysing rental costs, which again could be appraised against incomes – see [ONS Average private rent price and annual inflation, local authorities in England and Wales](#). The availability of housing is also problematic for northern Devon, particularly within the Private Rented Sector and this should be considered directly.

3.5.27 – Given that the assessment of impact is benchmarked against the overall level of GVA, would suggest that the value of tourism should be considered against a more localised geography, as it is unlikely to currently identify localised adverse impacts which could be more pronounced given the nature of both the project and the local tourism economy.

Paragraph 3.5.35 – Walking and Cycling Routes - Whilst the list of walking and cycling routes is reasonable, it does not take account of the wider network of Public Rights of Way (PROW) that can be found across the Local Area and which can be utilised in combination with some of the other more strategic routes such as the South West Coast Path to make more bespoke opportunities. This is particularly the case for routes in and around Cornborough and Abbotsham Cliffs, near to the landfall of the proposed cable route.

Paragraphs 3.5.39 - 3.5.41 – Demographics – this is likely to provide an under representation of the likely growth in population over the specified period. The adopted North Devon and Torridge Local Plan 2011-2031 provides for a housing and economic growth strategy above the baseline demographic projections. Further, the levels of growth were

established using earlier iterations of the ONS population and household projections, which tended to show higher levels of growth than those specified within the report. Whilst the adopted North Devon and Torridge Local Plan was only intended to plan for growth over the period up to 2031, it should be noted that much of the planned growth, particularly around Bideford and Northam, has proceeded to come forward later than anticipated and will likely continue to be built out well into the 2030s.

3.8.65 – Would suggest that the assumptions on proportions of spend are not reflective of the local context and that they contribute to underestimating the likely losses of spend. Evidence (The Economic Impact of the Torridge Visitor Economy 2022; The South West Research Company Ltd, December 2023) indicates that direct expenditure by category for Torridge is different to that cited – with 18% being spent on accommodation, 23% on shopping, 29% on Food and Drink, 11% on Attractions/ entertainment and 19% on travel. On this basis, the ‘recreational’ spend would amount to 63% of the overall spend, rather than the suggested 52%.

3.8.68 & Table 3.45 – Would suggest that the geography for the Local Area definition relating to tourism should be reduced, to better reflect the more focused likely geographical impact of the proposals – which are likely to be acute for a much smaller area, given that the displacement and use of tourism accommodation by workers is likely to be focussed to that close to the construction activity. The current approach to the analysis is therefore likely to downplay the potential impact on the tourism sector in the area close to the Onshore Infrastructure Area and associated construction activity. The incorporation of North Devon into these metrics is likely to disproportionately skew the assessment as that area has a far larger tourism sector in terms of quantity of accommodation, number of day trips, number of overnight stays (and nights), spend and employment. The identified displaced spend of £2.8m is a not insignificant sum when viewed in the more localised context of the proposal and where in reality, the workforce is likely to seek accommodation. Evidence (The Economic Impact of the Torridge Visitor Economy 2022; The South West Research Company Ltd, December 2023) indicates, for example, that the overall total visitor related spend for Torridge as a whole is c.£117.84m, which is significantly lower than that identified for the Local Area (£366.7m) within the report (Table 3.27). The potential wider loss of spend could also have a more localised impact on individual businesses and a more profound impact on associated tourism spend by visitors on services, facilities and attractions found in and around Bideford, Northam, Westward Ho! And Appledore and nearby rural settlements such as Abbotsham. Reflecting this more realistic geography would likely have a profound impact on the overall analysis and the significance of the effect.

3.6.67 & 3.8.68 – the report suggests that the tourism industry in the local area is very seasonal. Whilst this maybe the case, there has been a trend to see an increase in year-round visits. Accordingly suggest that the assumption of the workforce displacing tourists during only the three months of summer (July, August and September) is likely to underestimate the likely impact. Evidence (The Economic Impact of the Torridge Visitor Economy 2022; The South West Research Company Ltd, December 2023) suggests that across Devon there are significant peaks in the number of nights of staying visits in April and also June.

3.8.70 and Table 3.46 – Tourism and Recreation – There appears to be a discrepancy between the conclusion on the significance of effect on tourism and recreation specified in the paragraph of text – Moderate (Adverse) and in the proceeding table – Minor (Adverse).

Human Health

Volume 4 chapter 4 – Health

Table 4.16 – Summary indicators to transport health outcomes

Percentage of physically active children and young people (5-16 years)?

Percentage of physically active adults (19+ years) - We know from Active Lives survey 2020, that Torridge has the highest levels of inactivity in Devon. The opportunity to use active travel is therefore essential to these identified groups.

Table 4.17 - Summary indicators to open space, leisure and play

The above comments regarding Torridge inactivity levels applies to this also. Any disturbance in access to walking/cycling routes, open space in general will have an impact on the we