



Appendix 2: Draft Representation to XLinks Pre-Application General Consultation Questions

Date: July 2024

XLinks Morocco-UK Power Project

DRAFT Representations submitted on behalf of Torridge District Council to the Pre-Application General Consultation Questions

The Project remains at Pre-Application Stage and the details forming part of the consultation have been reviewed by Torridge District Council Officers in consultation with Torridge District Council Members. 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 Project still being subject to development 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 to the PEIR and these General Consultation Questions on these matters. However, the Council 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, given the potential for significant impacts within Torridge District. Notwithstanding this, the representations below do refer to highways concerns giving the Council's local knowledge.

The Comments made at this stage are set out under the relevant General Consultation Questions below and should be considered in conjunction with the matters raised in the Council's response to the PEIR.

Do you have any comments on our proposals for the converter station site during:

a. Construction?

Highways Impacts

Traffic from the construction phase has the potential to have a significant impact on the Bideford area, in particular the Bideford-East and Two Rivers & Three Moors Wards, for up to six years due to large increases in traffic travelling Manteo Way and between the construction compounds and the convertor station site. Figures in the PEIR show up to 80 HGV movements per day, plus up to 532 other vehicles, an increase of 29% and 10% on projected traffic flows for 2027. Clarification is sought as to whether these predictions consider likely increases in traffic from new housing developments expected to be built over this period, also additional HGVs and other traffic from the proposed Bideford Business Park development. The Council also wants to highlight its proposal for a new Operational Services Centre, which would be accessed via Manteo Way / Alverdiscott Road, and the

need for the EIA to consider traffic movements from this development in any cumulative assessment.

Northern Devon already has a significant problem with the poor standard of the highway network, particularly a high prevalence of potholes. While Manteo Way has been repaired recently by the Local Highway Authority, the impact of this level of increase of traffic will undoubtedly cause considerable wear and tear to all the roads being used by Xlinks during the extensive construction phase. The movement of very heavy loads, electrical equipment etc., will add a burden to the District's roads which will need to be mitigated for.

Design & Visual Impact

The current consultation has limited details in respect of the design and scale of the converter stations. The Council is keen to have sight of visual material as soon as it is available and for this to be discussed in future pre-application meetings.

The site is prominent and whilst it is proposed to sink the building down into the land and provide extensive landscaping, it is important that the scheme is mitigated as far as possible to reduce any impact on the character of the surrounding landscape. The Council's response to the PEIR sets out detailed comments on landscape and visual impact matters which can be discussed in future pre-application meetings.

Noise & Air Pollution

In addition to traffic, the construction phase will inevitably also lead to an increase in dust and noise pollution for residents living in the vicinity of the construction sites. The Council's response to the PEIR sets out detailed comments from its Environmental Protection Team.

Impact of Construction Phase on local resources, e.g. housing, access to labour, building materials, impact on local tourism businesses

The construction phase will give rise to socio-economic impacts on the District's communities.

The Council is concerned that the influx of a significant and temporary workforce will put pressure on local housing supply which could lead to greater pressures on temporary accommodation. It is crucial that the EIA accurately assesses this impact and secures mitigation measures.

The EIA must also accurately evaluate and mitigate the impact on local businesses, both in terms of the construction industry (access to workforce, materials etc) and in terms of impacts on existing tourism attractions and accommodation in the area.

b. Operations?

The Council is concerned over the potential impact of any overground Pylon route and would suggest cables should be buried in sensitive areas.

Do you have any comments on our proposals for onshore cables during:

a. Construction?

Highways

The PEIR report shows Xlinks construction work will lead to increases of up to 38% in HGV traffic on the A39. Although the cabling work construction period is only estimated to be over a couple of years (compared with five or six for the converter station construction), this still has the potential to give rise to a considerable impact and should be properly assessed and

mitigated for through the EIA process. The views and position of the Local Highway Authority (Devon County Council) will be important in this regard, however, as a '*host authority*', the Council wishes to be involved in all highway discussions throughout this Pre-Application Stage.

Impact on Biodiversity

The cabling work will inevitably lead to the loss of a considerable amount of hedgerows and other areas of biodiversity. While it is noted that XLinks is proposing to deliver net gain in terms of biodiversity, this isn't going to happen instantly. Any net gain provision should be delivered at the earliest possible stage in the development.

Thorough and robust ecological surveying is needed to properly understand impacts and to enable mitigation. The Council has appointed an external ecologist who will be available for upcoming ecology focused pre-application meetings.

b. Operations?

No comment.

Do you have any comments on our proposals for offshore during:

a. Construction?

Digging cables into the seabed is going to cause harm and disruption to the marine environment. Thorough investigation is needed of the effect on life on seabed including an assessment of impacts of noise arising from construction.

b. Operations?

The Council questions the ability for the cables to be secure and safe from sabotage and damage.

Do you have any thoughts on benefits to the community and how we can support local initiatives?

The Council notes that XLinks is seeking views on the nature and content of a community benefit package.

There will be mitigation identified through the EIA process to address the impacts identified against the various technical areas. For example, the socio-economic impacts arising from the development must be identified, evaluated and mitigated via the EIA process. Such impacts, as identified above, will likely include reduced access to and availability of temporary housing, reduced availability of construction workers and materials, reduced incomes and business for local tourism / visitor attractions etc. The Council believes that the approach to mitigation of these impacts should be considered in a holistic manner with a view to the potential for legacy benefits. The Council understands the difference between mitigation that is required to address impacts, and therefore relevant to be secured via the DCO process, and community benefits that sit outside of this process. However, it is important that any mitigation measures required to address temporary impacts, e.g. accommodation for construction workers, are assessed in terms of the potential for them to remain in the longer term as a community benefit, e.g. to address the challenge of insufficient temporary accommodation across District. This principle can extend to highway mitigation, for example, temporary road diversions / new routes may be best retained as permanent routes to provide an overall betterment to the highway.

As a 'host authority', the Council is best placed to play a key role in any negotiations and discussions around community benefit. Initial thoughts expressed by Members direct towards a mix of legacy and community-fund type benefits that seek to align with and support delivery of the Council's corporate strategies, most notably the Strategic Plan 2024-29, North Devon and Torridge Economic Strategy 2024-2029, North Devon and Torridge Clean Maritime Growth Vision, (emerging) Torridge Housing Strategy, Northern Devon Culture Strategy and the Torridge Carbon, Environment and Biodiversity Plan. Devon County Council strategies and plans will also be relevant, including the Barnstaple with Bideford and Northam Local Cycling and Walking Infrastructure Plan. It will be important for any community benefit approach to be strategic and have a legacy.

The Council has prepared a Place Story to support consideration of its Levelling-Up Partnership status. The Place Story highlights key socio-economic indicators and explores opportunities for growth and increasing prosperity. Any community benefit package should be informed by the Place Story.

The approach to community benefit needs to be progressed through discussions between key parties to explore what is potentially being offered and how this can best be secured and governed. There are parts of the District that will be affected to a greater extent than others, e.g. those Wards affected by construction, some of which are amongst the poorest. A fair, equitable approach should be taken however the nature of any package should be such that wider socio-economic benefit is realised. It is noted that XLinks is already in discussion with Petroc to explore skills and education benefits, which is welcomed, however it is important that a joined-up approach is taken to enable the widest benefit to be achieved.

The Council is seeking external advice to inform its position on community benefits and requests that dedicated meetings taken place alongside the technical matters being discussed through the Pre-Application Stage. Any community benefit package should be fair, proportionate, strategic in aligning with wider Council strategies, and involve a combination of legacy / transformative benefits and community funds.

Do you have any thoughts on opportunities that you feel exist locally to enhance the local environment, particularly biodiversity?

Although it is a beautiful rural area, Northern Devon does not have a good network of public footpaths or many areas of open space that are widely accessible. If this project could deliver greater access to the countryside for residents, that would be of significant benefit. Linked with this and the need to promote active travel, a specific project could be creating a new cycling/walking route to link the south and west of Bideford with the coast path.

The Council has previously suggested that the cabling route used by Xlinks could be converted into a cycle path, but it is understood that this area will be subject to easements and remain within the original landownership. However, funding could be provided to develop/enhance existing footpaths and other off-road paths between Landcross and the Abbotsham Cliffs area in order to create a good quality cycling and/or walking route that connects the Tarka Trail with the coast path.

A comprehensive and effective landscaping scheme to deliver tree planting, hedge creation and widening would provide an opportunity for long-term environmental enhancements.