



XLINKS MOROCCO-UK POWER PROJECT

Programme Document

PINS reference – EN010164



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1.1 Introduction

- 1.1.1 Xlinks Morocco to UK Power Project comprises a proposed renewable power generation facility in Morocco connected to a Converter Site in North Devon via a subsea marine cable. For ease of reference, the UK elements of the Project are referred to as the 'Proposed Development'. The Proposed Development is a Converter Site situated adjacent to the existing Alverdiscott 400kV substation and associated development including approximately 371km of offshore cable, 14.5km of onshore cable, localised utility diversions at the Converter Site and highway works to facilitate the construction and operation of the Proposed Development. This pre-application Programme Document sets out the main steps that Xlinks 1 Limited (the 'Applicant') anticipates taking during the preparation of the application.
- 1.1.2 This document will be maintained by the Applicant throughout the pre-application stage. A public pre-application Programme Document will be published on the Applicant's website.
- 1.1.3 The Applicant will communicate updates to the pre-application Programme Document to the Planning Inspectorate proactively, with a clear description of the potential impacts on the requested services of the Inspectorate, relevant statutory bodies, local authorities and other stakeholders provided.
- 1.1.4 The main features of the Proposed Development are:
- Onshore elements:
 - Converter Site – the Site includes two converter stations to convert electricity from high voltage direct current (HVDC) to high voltage alternating current (HVAC) before transmission to the National Grid;
 - HVAC Cables – these cables connect the Converter Site to the GB National Grid, via the National Grid Electrical Transmission (NGET) Alverdiscott Substation. The HVAC cables would be situated within the onshore HVAC Cable Corridors;
 - Onshore HVDC Cables – these cables will link the converter stations to the landfall Site and will be located within the onshore HVDC Cable Corridor.
 - Landfall Site:
 - This is where the offshore cables are jointed to the onshore cables. This term applies to the entire landfall area between Mean Low Water Springs (MLWS) and the Transition Joint Bay (TJB). This includes all construction works, including the offshore and onshore cable routes, intertidal working area and landfall compound.
 - Offshore elements:
 - Offshore HVDC Cables – these cables will bring electricity from the Moroccan generation facility to the landfall and are located within the UK Exclusive Economic Zone (EEZ).
- 1.1.5 This document details the following information:
- Timetable of the Pre-Application process (retrospectively and future) including planned submission date;

- Areas of interest for examination (main project issues for resolution and risks) and the plan to resolve or management them;
- The plan for engaging stakeholders and details of financial support in place; and
- Cross reference to the Statement of Community Consultation (SoCC).

1.2 Pre-Application Timetable

Overview

- 1.2.1 During the pre-application stage, a detailed programme was developed to achieve the key activities required before submission. At the time of writing, the Proposed Development is progressing towards submission through this programme. This section will summarise the activities that have taken place to date and forecast those activities remaining to achieve the successful submission of the DCO application.
- 1.2.2 It should be noted that in August 2023, the Applicant sought direction from the Secretary of State for Energy Security and Net Zero (the 'Secretary of State') under section 35 of the Planning Act to confirm that elements of the Proposed Development should be treated as development for which development consent under the Planning Act 2008 is required. A direction was duly made on 26 September 2023 confirming the Secretary of State's conclusion that the overall Project is nationally significant and directed that development consent is required for the converter stations.

Planned Submission Date

- 1.2.3 It is the Applicant's intention to submit its DCO application in the week commencing the **18th November 2024**.

Timetable of Activities

- 1.2.4 The main events and dates during the pre-application period are set out below:
- Non-Statutory Consultation: November 2022 and March-April 2023.
 - EIA Scoping Report Submitted: 29 January 2024
 - EIA Scoping Opinion Received: 07 March 2024
 - Statement of Community Consultation Published: 14th May 2024
 - Statutory Consultation Period: 16th May -11th July 2024
 - Preparation of Statements of Common Ground: Ongoing
 - Adequacy of Consultation Milestone: September / October 2024
 - Application Submitted: w/c 18th November 2024
- 1.2.5 Further programme details on engagement with relevant statutory consultees and other stakeholders throughout the pre-application period are set out in Section 4.

1.3 Areas of interest for examination

Overview

1.3.1 This section identifies the Applicant’s view on the main considerations that may require resolution with stakeholders and associated next steps.

Table 1: Main Issues and next steps by topic area

Topic	Issues	Proposed Activities
Traffic and Transport Public Rights of Way	<p>Traffic, transport and PRoW –</p> <ul style="list-style-type: none"> • access to site including the formation of new and improved junctions; • crossings of PRoW along the Onshore Cable Corridor; • temporary stopping-up and diversions of public roads and traffic management during construction; • routes used by Abnormal Indivisible Loads (AILs) and requirements for temporary street furniture removals; • routes and volumes of construction HGV traffic; and • permanent improvements of local roads for adoption by the Highways Authority. 	<p>Continued engagement with relevant stakeholders regarding:</p> <ul style="list-style-type: none"> • design of junctions, road improvements; • traffic management arrangements; • mitigation of HGV traffic impacts; and • permanent improvements of local roads for adoption. <p>Mitigation measures will be secured through the outline Construction Traffic Management Plan (oCTMP) and outline Public Rights of Way Management Plan.</p>
Socio-Economic Human Health	<p>Accommodation –</p> <ul style="list-style-type: none"> • arrangements for local temporary accommodation of construction workforce minimising impacts to the tourism economy. <p>Skills and Training –</p> <ul style="list-style-type: none"> • arrangements for upskilling the local workforce to benefit from opportunities presented by the Proposed Development. 	<p>Continued engagement with relevant stakeholders on employment opportunities and accommodation arrangements.</p>
Biodiversity and Ecology	<p>Biodiversity Mitigation –</p> <ul style="list-style-type: none"> • avoiding and/or minimising impacts on protected species and mature vegetation crossed by the Onshore Cable Corridor; • proposals for translocation and reinstatement and opportunities for enhancement of Devon hedge-banks along the Onshore Cable Corridor as necessary; • proposals for increased biodiversity in the Converter Site landscape scheme. 	<p>Continued engagement with relevant stakeholders regarding mitigation proposals and biodiversity design.</p> <p>Mitigation measures will be secured through the outline Construction Environmental Management Plan (oCEMP) and the outline Landscape and Ecological Management Plan (oLEMP).</p>

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Topic	Issues	Proposed Activities
Historic Environment	<p>Heritage –</p> <ul style="list-style-type: none"> • impact on the significance of the setting of the Scheduled Monument west of the Converter Site; • impacts on known/suspected buried archaeology along the Onshore Cable Corridor; and • opportunities for knowledge gain/sharing on local archaeological assets. 	<p>Continued engagement with relevant stakeholders on mitigation proposals.</p> <p>Mitigation measures will be secured through the outline Working Scheme of Investigation (oWSI) and the oLEMP.</p>
Landscape and Visual	<p>Landscape –</p> <ul style="list-style-type: none"> • impacts on mature vegetation along the section of the Onshore Cable Corridor within the National Landscape; • changes to landscape character at the Converter Site; • impacts on distant views from the National Landscape and high ground to the north and from other local viewpoints; • mechanisms for control of the detailed design of the Converter Site infrastructure and the earth modelling surrounding the Converter Site; and • opportunities for mitigation of landscape and visual effects through the Converter Site landscape scheme. 	<p>Continued engagement with relevant stakeholders regarding the impact on landscape character and views.</p> <p>Control of the Converter Site detailed design through a Design Principles Document.</p> <p>Mitigation measures will be secured through the oLEMP.</p>
Climate Change	<p>Embodied Carbon –</p> <ul style="list-style-type: none"> • impacts associated with the manufacture and construction of infrastructure used in the wider Project. 	<p>Mitigation measures will be secured through a Carbon Reduction Strategy prepared during the detailed design process (post DCO approval).</p>
Noise Air Quality Hydrology Ground Conditions Land Use and Soils Waste	<p>Construction Environmental Management –</p> <ul style="list-style-type: none"> • impacts associated with the construction of the Onshore Cable Corridor and Converter Site. 	<p>Mitigation measures will be secured through the outline Construction Environmental Management Plan (oCEMP) which will contain various sub-plan documents to manage specific issues during construction.</p>
Land Agreements	<p>Land access –</p> <ul style="list-style-type: none"> • provision of access for surveys to support baseline assessments. <p>Compulsory Purchase –</p> <ul style="list-style-type: none"> • exercise of compulsory purchase orders 	<p>Continued engagement with relevant landowners to secure voluntary access.</p> <p>Securing voluntary land agreement with relevant landowners</p>
Offshore Elements	<p>Methodology –</p>	<p>Continued engagement with the relevant statutory</p>

Topic	Issues	Proposed Activities
	<ul style="list-style-type: none"> • Choice of methodology used for surveys of offshore ornithology • Methods used for the burial/location of offshore cables 	<p>stakeholders to come to an agreement of the methodology used for the ES.</p> <p>Mitigation measures will be secured through a Cable Burial Risk Assessment (CBRA).</p>

1.4 Approach to stakeholder engagement

- 1.4.1 As noted in paragraph 1.2.2, the Project received a section 35 direction in September 2023 from the Secretary of State. Prior to this it can be confirmed that two rounds of consultation with local planning authorities and relevant stakeholders took place which were undertaken under the Town and Country Planning Act 1990 regime (noting a TCPA application was not submitted for the Proposed Development).
- 1.4.2 We are continuing to engage widely with stakeholders and communities in the vicinities of the Proposed Development. Audiences for engagement include:
- Statutory Consultees
 - Host and neighbouring local authorities;
 - Prescribed Consultees;
 - Relevant Statutory Undertakers; and
 - Persons with an interest in the land.
 - Offshore Consultees
 - Commercial users;
 - Fisheries;
 - Environmental groups; and
 - Leisure groups (e.g. surfers).
 - The Community
 - Walking groups;
 - Riding groups;
 - Cycling groups;
 - Environmental groups;
 - Local residents;
 - Elected representatives; and
 - Community Groups.

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- 1.4.3 Each of these will have different interests in the Proposed Development and wish to engage with us differently. This section summarises who falls into these broad groups and how we will engage with them.
- 1.4.4 Table 2 below outlines a series of completed and proposed engagements with stakeholders, which has been designed to ensure that all such parties are adequately informed and can provide input at the appropriate stages of the application process.
- 1.4.5 Additionally, the Applicant has issued Planning Performance Agreements (PPA) and signed Discretionary Advice Service (DAS) agreements with key stakeholders to facilitate a smoother and more efficient pre-application process. These agreements should help to provide the necessary resource and support, enabling them to effectively inform the Proposed Development and help to foster a cooperative and constructive relationship.
- 1.4.6 The following agreements have been issued:
- PPA for the pre-application stage – Torridge District Council;
 - PPA for the pre-application stage – Devon County Council;
 - Discretionary Advice Service – Environment Agency
 - Discretionary Advice Service – Natural England
 - Discretionary Advice Service – Historic England
 - Discretionary Advice Service – Joint Nature Conservation Committee; and
 - Discretionary Advice Service – Marine Management Organisation
- 1.4.7 The Applicant also undertook Statutory Consultation and published a Statement of Community Consultation (SoCC), as required under Section 47 of the Planning Act 2008. Before publishing the SoCC, we consulted with the Torridge District Council, Devon County Council and North Devon Council on the draft version for a period of 28 days.

Table 2: Approach to Stakeholder Engagement

Audience	Methods of Engagement
Planning Inspectorate	<ul style="list-style-type: none"> - Direct Engagement - Written briefings
Prescribed Consultees (Technical on/offshore)	<ul style="list-style-type: none"> - Direct engagement through relevant technical lead(s) - Written briefings - Invitation to in-person consultation events - Preparation of SoCG (where required) - Project website and virtual exhibition
Prescribed Consultees (Community and non-governmental organisations)	<ul style="list-style-type: none"> - Direct engagement - Written briefings - Invitation to in-person consultation events - Project website and virtual exhibition
Host Authorities	<ul style="list-style-type: none"> - Direct engagement (inc. fortnightly meeting with planning officers from February 2024) and ongoing liaison with relevant technical leads.

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	<ul style="list-style-type: none">- Written briefings- Invitation to in-person consultation events- Project website and virtual exhibition- Preparation of SoCG
Neighbouring Authorities	<ul style="list-style-type: none">- Written briefings- Invitation to in-person consultation events- Project website and virtual exhibition
Community	<ul style="list-style-type: none">- Direct engagement (including meetings with residents and community organisations/elected representatives on request)- Newsletter- Project website and virtual exhibition- Invitation to in-person consultation events
Land Owners	<ul style="list-style-type: none">- Invitation to in-person consultation events- Project website and virtual exhibition- Long-term direct engagement - earliest engagement in 2021- Close communication in person and via land agents- Opportunities for meetings with engineers on specific concerns.

1.5 Minimising programme risks

1.5.1 The project manager for the Applicant monitors risks on an ongoing basis, allowing for the early detection and resolution of obstacles that could impede progress. This person is responsible for monitoring and managing all aspects of the risk management process. This includes the following:

- The development and regular review of a risk register;
- Ensuring there are adequate resources for managing risks;
- The continual monitoring of the Project to identify any new or changed risks; and
- Regular reporting on the status of risks to internal senior management.