

Devon County Council

Pre-Examination Submission

Xlinks Morocco-UK Power Project

Planning Inspectorate's Reference: EN010164

30 April 2025



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Glossary of Acronyms

Acronym	Meaning
ExA	Examining Authority
ISH	Issue Specific Hearing
OFH	Open Floor Hearing
s106	Section 106
The Applicant	Xlinks 1 Ltd
The County Council	Devon County Council
ToDC	Torridge District Council

1. Purpose of this Submission

- 1.1. The purpose of this submission is to respond to the Examining Authority's (ExA) Rule 6 letter, dated 8th April 2025. It will address Devon County Council's ("The County Council") comments on the procedure of the Examination and the Initial Assessment of Principal Issues, outline requests to be heard and participate in the initial hearings, as well as make suggestions for site visit locations.

2. Comments on the Procedure for Examination

- 2.1 The County Council is content for the examination to proceed on the basis that the hearings for the examination will be in a "blended" format. The County Council and legal advisors are generally well adapted to working virtually and therefore have no concerns regarding this.
- 2.2 It is likely that the County Council's attendance will be in person to many of these events. Where virtual attendance is requested, details such as email addresses will be provided.

3. Requests to be Heard Orally at the Preliminary Meeting

- 3.1. The County Council requests to be heard orally at the Preliminary Meeting.
- 3.2. The County Council requests to attend both in person and virtually. In person, the County Council will be represented by:
 - [REDACTED] – Principal Planning Officer
 - [REDACTED] – Senior Planning Officer
 - [REDACTED] – Assistant Planning Officer (attending without intention to speak)
 - [REDACTED] – Graduate Trainee Planner (attending without intention to speak)
- 3.3. The County Council will also be represented virtually by:
 - [REDACTED] – Partner at Womble Bond Dickinson (UK) LLP
[REDACTED]@wbd-uk.com)
- 3.4. The County Council wishes to contribute to:
 - Item 3 – Initial Assessment of Principal Issues
 - Item 4 – Draft Examination Timetable

4. Comments on the Initial Assessment of Principal Issues

- 4.1. Annex C of the Rule 6 letter sets out the initial assessment of the principal issues. The County Council notes that this is not a comprehensive or exclusive list of the issues that will be subject to examination. It is likely the County Council's Local Impact Report will focus on those issues contained within the relevant representations submitted, which included additional issues to those listed within Annex C, for example, the crossing of watercourses.

5. Comments on the Draft Examination Timetable

- 5.1. The draft examination timetable is set out in Annex D of the Rule 6 letter.
- 5.2. The County Council is largely content with the proposed timetable of the deadlines and appreciates the need to complete the examination within 6 months, however, wishes to make comment on the following deadlines.

Section 106 (s106)

- 5.3. It is noted that the draft examination timetable does not make any reference to the need for a s106 agreement. Given the complexity of the project, the County Council is likely to request that the Applicant enters into a s106 agreement with the County Council, details of which are likely to be set out in the County Council's Local Impact Report. It is therefore considered that draft s106 documents and comments on this should be included within the examination timetable of the project. The County Council suggests that an initial draft should be produced by the Applicant at Deadline 3.

ExA's Written Questions

- 5.4. It is noted that the specific publication date of the ExA's written questions (ExQ1) has not been identified at this stage. However, the County Council would request that this is scheduled after Deadline 1. The County Council's Local Impact Report is expected to provide more detail to the relevant representations made in March and may result in some questions being answered. The number of deadlines scheduled in the draft timetable could provide this flexibility.
- 5.5. In addition to this, it is noted that the first written questions are likely to clash with the requirements within the first deadline. The County Council is concerned that this will place additional pressures on the organisation.
- 5.6. The publication of ExQ2 on 19th August 2025 may present resourcing issues given the summer period and bank holiday. The County Council requests Deadline 4 is extended an additional week to provide sufficient time to respond.

Issue Specific Hearings (ISH)

- 5.7. It is noted that the ISHs are scheduled for the week commencing 14th July 2025. The topics of these hearings have yet to be identified by the ExA. The County Council requests that the details of the ISH are published by the ExA within the final examination timetable to allow the County Council to appropriately plan for the resources required. The County Council would request that traffic and transport has an ISH, as a minimum.
- 5.8. The County Council's legal representative is unavailable the week commencing 14th July 2025. The County Council has land interests and is likely to request to be heard at a compulsory acquisition hearing. The County Council would then support the delay of Deadline 3 by a week to accommodate the delay of the hearings.
- 5.9. In summary, the County Council requests the following amendments to deadlines:
- Deadline 2 to be 2nd July 2025;
 - ISH to take place w/c 21st July 2025;
 - Deadline 3 to be 5th August 2025;
 - Deadline 4 to be 16th September 2025.

6. Requests to attend the Open Floor Hearing 1 (OFH1)

- 6.1. The County Council requests to attend the OFH1 virtually on Tuesday 20th May 2025 without intention to speak, and will be represented by [REDACTED]

7. Request to Participate in Issue Specific Hearing 1 (ISH1)

- 7.1. The County Council requests to participate in ISH1 on Wednesday 21st May 2025.
- 7.2. The County Council requests to attend the ISH1 in person and virtually. The representatives that wish to attend in person are:
- [REDACTED] – Principal Planning Officer
 - [REDACTED] – Senior Planning Officer
 - [REDACTED] – Assistant Planning Officer (attending without intention to speak)
 - [REDACTED] – Graduate Trainee Planner (attending without intention to speak)
- 7.3. The County Council representatives that wish to attend virtually are:
- [REDACTED] – Partner at Womble Bond Dickinson (UK) LLP
[REDACTED]@wbd-uk.com

8. Suggested Locations for ExA Site Inspections

- 8.1. In addition to visiting the location of development within the Order Limits, the County Council recommends that the site inspections also follow the proposed AIL and HGV routes. In particular the County Council requests that any site inspections should include visits to the following locations (appendix I). It is noted that it may not be possible to stop at some of these locations, but the County Council requests that the reasons are considered when passing these locations:

Map ref.	Site	Reasons
1	Road near Kenwith Castle care home	To note character of road and use as a designated school walking route – road safety concerns with increase of HGV traffic.
2	Bideford Quay, including Bridge Street/A386/Old Bideford Bridge Roundabout	To note character of route – area of high active travel, classified as a High Harm route, Bridge Street junction is sub-standard with high turning conflict – road safety concerns with increase of HGV traffic.
3	A386 route, including: a) Heywood Roundabout b) A386/Road to Littleham junction c) Bideford Quay (see Map ref. 2 above) d) Bridge Street/A386/Old Bideford Bridge Roundabout to Pillmouth, Landcross	Route to be used by HGVs – road safety concerns: <ul style="list-style-type: none"> • Road with high speeds and potential conflict with turning vehicles • Heywood roundabout is an area with a number of collisions • A386/Road to Littleham junction is the location of highway works for access to a compound • Possible Tarka Trail route diversion – Old Bideford Bridge to Pillmouth, (Landcross)
4	Manteo Way to Gammaton Road Compound Access	To note existing highway character due to road safety concerns - lack of path; lack of street lighting; width etc
5	Gammaton Cross	To note existing highway character due to road safety concerns - Road safety concerns of any large vehicles using this junction during operation.

6	Gammaton Road – haul road crossing point	Unknown traffic management arrangements – with a potential lack of visibility
7	Road from Converter Site to Gammaton Cross	To note existing highway character for long term operational traffic – road safety concerns
8	Manteo Way/Barnstaple Street junction	To note existing highway character due to road safety concerns
9	Haul road crossing point north west of Abbotsham (labelled as plot 3-04 on Sheet 3 of 14 in APP-006)	An example of single lane haul road crossing point – unknown traffic management arrangements
10	Manteo Way	To note existing highway character – key active travel route, with LCWIP looking to improve links - road safety concerns with increase of HGV traffic.
11	Torridge Bridge	Structure for use as AIL route.

[REDACTED]

County Planning Manager

Devon County Council

Appendix I - Suggested Locations for ExA Site Inspections

