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Xlinks Morocco-UK Power Project Case Team Planning Inspectorate XLinks@planninginspectorate.gov.uk (Email only)

MMO Reference: DCO/2024/00002

Planning Inspectorate Reference: EN010164

Identification Number: 20055572

30 April 2025

Dear Sir or Madam,

Planning Act 2008, Xlinks First Limited, Proposed Xlinks Morocco-UK Power Project Order

# Response to Examining Authority's Rule 6 Letter

On 20 January 2025, the Marine Management Organisation (the "MMO") received notice under section 55 of the Planning Act 2008 (the "PA 2008") that the Planning Inspectorate ("PINS") had accepted an application made by Xlinks First Limited, (the "Applicant") for determination of a development consent order ("DCO") for the construction, maintenance and operation of the proposed Xlinks Morocco-UK Power Project (the "DCO Application") (MMO ref: DCO/2024/00002; PINS ref: EN010164).

The Applicant seeks authorisation for the construction, operation and maintenance of the DCO Application, comprising of approximately 371 kilometres ("km") of High Voltage Direct Current ("HVDC") cables in two bundled pairs offshore within UK waters, which would make landfall at Cornborough Range in Devon and travel approximately 14 km onshore to two converter stations on land to the west of Alverdiscott 400 kilovolt ("kV") substation (the "Project").

The MMO received a Rule 6 letter on 08 April 2025. Please find the MMO comments below on the following topics:

- 1. Preliminary Meeting Attendance
- 2. Comments on Examination Timetable
- 3. Anything further required from Examination Authority
- 4. Notification that the MMO will not be attending OFH1 or ISH1

Yours faithfully

Marine Licensing Case Officer







# Copied into response:

<u>@marinemanagement.org.uk</u> (Marine Licensing Case Manager)<u>@marinemanagement.org.uk</u> (Senior Marine Licensing Case Manager)







# 1. Preliminary Meeting Attendance

1.1 The MMO will not be attending the Preliminary Meeting on Tuesday 20 May 2025. The MMO has reviewed the draft timetable for the examination of the application and would like to highlight the following concerns for consideration by the Examining Authority ("ExA").

#### 2. Comments on Examination Timetable

- 2.1 With regard to the draft examination timetable, the MMO notes that the first issue specific hearing ("ISH1") is the day after the preliminary meeting. The MMO questions the practicality of having these hearings consecutively. The MMO requests that the ExA considers rearranging these hearings to allow all participants to fully attend when there is a change in position or further discussion is required.
- 2.2 The MMO requests the issue specific hearings ("ISH") are organised to minimise the need for MMO to be in attendance for the entirety of the hearing, (e.g. split into offshore matters and onshore matters). This would benefit team resources and allow for better utilised time.
- 2.3 The MMO notes that the 'ExA's commentary on, or schedule of changes to, the dDCO' is planned to be published on 19 August 2025. The MMO suggests that 'an updated dDCO in clean, tracked and Word versions (if required)' is requested to be submitted at Deadline 4 on 09 September 2025 and the 'ExA's commentary on, or schedule of changes to, the dDCO' is published between Deadline 4 and Deadline 5. This is so that time is given for any comments on the dDCO received within written representations submitted at Deadline 3 to be reviewed and any updates submitted into examination at Deadline 4.
- 2.4 The MMO requests that documents published at each deadline are made available on the PINS website as soon as possible after submission.

## 3. Anything further required from Examination Authority

- 3.1 The MMO notes that the ExA has requested summaries of Relevant Representations that exceed 1500 words. The MMO will be submitting this as a separate document.
- 3.2 The MMO has not yet been provided with a copy of the Applicant's draft Statement of Common Ground. The MMO will review and may provide comments when this is provided.

### 4. Notification that the MMO will not be attending OFH1 or ISH1

- 4.1 The MMO notes that the examination is principally a written process. The MMO understands that some issues need to be discussed in person to ensure understanding by the ExA. At this stage, the MMO is not planning on attending any open floor hearings ("OFH") or ISH, however, will keep a watching brief and respond to any questions posed by the ExA on completion of the OFH or ISH. This is to ensure resource is spent on providing detailed written responses and resolving any issues with the Applicant.
- 4.2 If the ExA requests MMO attendance for an ISH, the MMO would ask that hearings are organised to minimise the need for the MMO to be in attendance for all hearings, (e.g., discussing both offshore matters and onshore matters). In addition to this, the MMO





would welcome any discussions on the deemed marine licence ("DML") or offshore DCO sections to be discussed at the earliest opportunity within the agenda. For example, in East Anglia One North and East Anglian Two, the agenda was rearranged to enable MMO involvement at the start of the hearing. This would enable better time utilisation, allowing for a more efficient and effective examination.

