

# **Torridge District Council**

## **Pre-Examination Submission**

### **Xlinks Morocco-UK Power Project**

Planning Inspectorate's Reference: EN010164

**30<sup>th</sup> 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 Ltd
DCC	Devon County Council
The District Council	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 8<sup>th</sup> April 2025. It will address Torridge District Council's ("The District 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 District Council is content for the examination to proceed on the basis that the hearings for the examination will be in a "blended" format. The District 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 District 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 District Council requests to be heard orally at the Preliminary Meeting.
- 3.2. The District Council requests to attend both in person and virtually. In person, the District Council will be represented by:
- [REDACTED] – Planning Manager
  - [REDACTED] – Principal Planning Officer
  - [REDACTED] – Planning Officer (attending without intention to speak)
- 3.3. The District Council will also be represented virtually by:
- [REDACTED] – Partner at Womble Bond Dickinson (UK) LLP  
[REDACTED]@wbd-uk.com
- 3.4. The District 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 District Council notes that this is not a comprehensive or exclusive list of the issues that will be subject to examination. It is likely the District 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, no notable efforts to improve local biodiversity.

## **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 District 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 District Council is likely to request that the Applicant enters into a s106 agreement with the Council, details of which are likely to be set out in the District 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 District 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 publication date of the ExA's written questions (ExQ1) has not been identified at this stage. However, the District Council would recommend that this is scheduled after Deadline 1. The District 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 District Council is concerned that this will place additional pressures on the organisation.
- 5.6. The publication of ExQ2 on 19<sup>th</sup> August 2025 may present resourcing issues given the summer period and bank holiday. The District 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 14<sup>th</sup> July 2025. The topics of these hearings are yet to be identified by the ExA. The District Council requires the ExA to publish more detail regarding each ISH within the final examination timetable to allow the District Council to appropriately plan for the examination.
- 5.8. As a minimum, the District Council would expect an ISH for landscape/design, socioeconomics, and ecology.
- 5.9. The District Council's legal representative is unavailable the week commencing 14<sup>th</sup> July 2025. The District Council would then support the delay of Deadline 3 by a week to accommodate the delay of the hearings.
- 5.10. In summary, the District Council requests the following amendments to deadlines:
- Deadline 2 to be 2<sup>nd</sup> July 2025;
  - ISH to take place w/c 21<sup>st</sup> July 2025;
  - Deadline 3 to be 5<sup>th</sup> August 2025;
  - Deadline 4 to be 16<sup>th</sup> September 2025.

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

- 6.1. The District Council requests to attend the OFH1 in person on Tuesday 20<sup>th</sup> 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 District Council requests to participate in ISH1 on Wednesday 21<sup>st</sup> May 2025.
- 7.2. The District Council requests to attend the ISH1 in person and virtually. The representatives that wish to attend in person are:
- [REDACTED] – Planning Manager
  - [REDACTED] – Principal Planning Officer
  - [REDACTED] – Planning Officer (attending without intention to speak)
- 7.3. The District 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

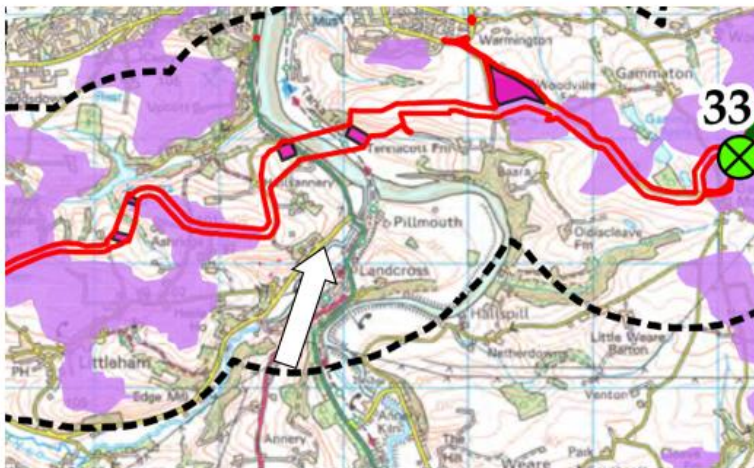
- 8.1. The District Council recommends that any site inspections should include visits to the following locations.

For landscape purposes, all the viewpoints identified in the LVIA (figs 2.5a-2.5e) should be visited by the ExA. In addition, the ExA should also visit the following locations:

A: view south from Cornborough road.



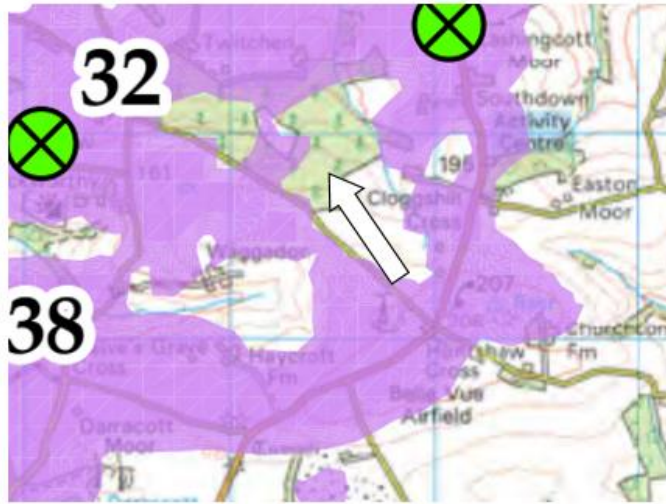
B View north north east from hill out of Landcross



The current viewpoint 32 from near Huntshaw cross is also a key view north.



C. view from the road to Huntshaw transmitter mast North west.



The District Council also suggests visiting the Converter Site as well as both of the Construction Compounds (A39/Gammaton) to assess the potential effects on landscape and nearby residential amenity. In addition, HDD works have the potential to have an adverse amenity impact on nearby properties. Thus, we also recommend a site visit of land immediately outside the properties nearest to the HDD works underneath the River Torridge (as suggested below).

