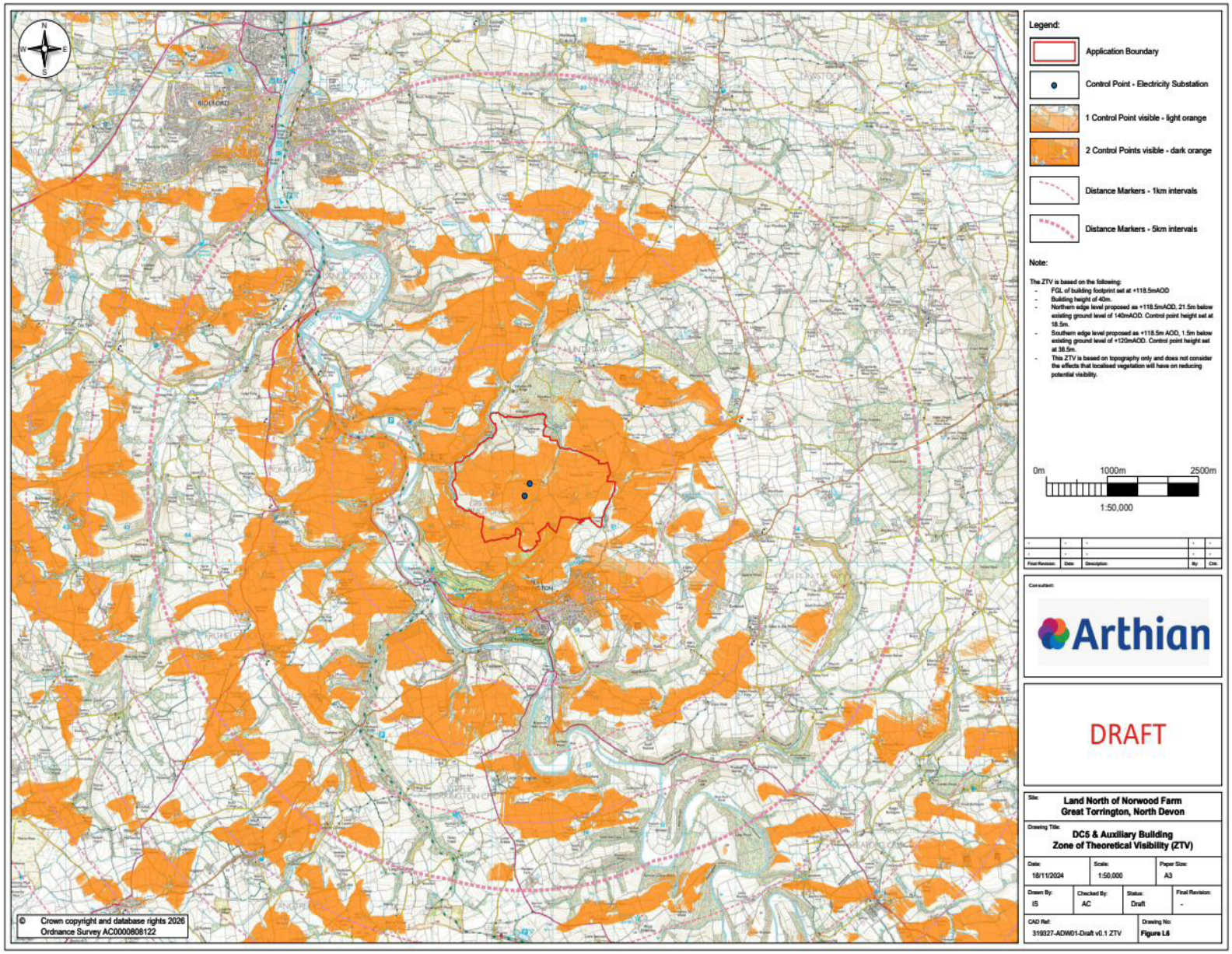
Designed while Morocco was still the plan

This visibility study is dated **18 November 2024.** To produce it, the **developer's consultants already needed the exact building heights for the Data Centre and layout fixed, not a rough concept.**

- The drawing below, prepared by Arthian, is dated 18 November 2024 in its own title block.
- A Zone of Theoretical Visibility study like this **cannot be produced from a vague idea**. **It requires exact building footprints, ground levels and heights, in this case a 40-metre building height for DC5, fixed and modelled in detail.**
- The drawing's own notes show how much of the hillside would need to be removed to accommodate building D5 if this model was used. Its finished ground level is fixed at 118.5m above sea level, which is **21.5 metres below the existing ground level of 140m on the northern edge**, against just 1.5 metres below the existing 120m ground level on the southern edge**. Cutting 21.5 metres into a hillside, roughly the height of a seven-storey building, is the scale of earthworks this model was already built on in November 2024.**
- At the same time, Xlinks was still pursuing its separate Morocco-UK Power Project as a Nationally Significant Infrastructure Project. That project was not paused until May 2025.
- Xlinks consulted Alverdiscott residents directly during this period, at Alverdiscott Community Hall on 27 April 2023 and again at Alverdiscott Village Hall on 21 May 2024, on its plans to connect the Morocco cable to Alverdiscott 400kV substation, the same substation the data centre and battery storage schemes now propose to use. Neither event, nor the consultation material accompanying it, mentioned a data centre.
- Stratus Data Developments Limited, the company that holds the land option for the data centre, was not incorporated until December 2024, a month after this ZTV study had already been completed.
- Torridge District Council's own records show the pre-application enquiry was formally received on 28 February 2025, with a meeting following on 25 March 2025, by which point the developer had already held detailed building height and layout modelling for over three months.
- Residents were not told anything about a data centre proposal until a public meeting in June 2026, nineteen months after this drawing was produced.
- The Council's own pre-application response on the data centre scheme, dated 10 April 2025, almost five months after this ZTV study was completed, states that *"key viewpoints to be agreed to inform any future landscape and visual impact assessment,"* **confirming the Council itself had no agreed visibility evidence at the point the developer already held a completed ZTV study modelling the 40 metre buildings.**

> **Key point:** The building heights and layout behind this study were fixed in November 2024, while Xlinks was still telling government it needed the Morocco project. Residents heard none of this until nineteen months later. **The Blue dots are two of the buildings- the Orange coloured areas is how far theoretically you could see them without vegetation or other obstructions.**

Sources: Zone of Theoretical Visibility, Figure L6 (Doc Ref 319327-ADW01-Draft v0.1 ZTV, Arthian Ltd, 18 November 2024). Council Knowledge Timeline and Devon County Council Highways correspondence confirming NSIP withdrawal in 2025, released by Torridge District Council under the Environmental Information Regulations 2004 (ref #11154, response dated 18 August 2026); Torridge District Council, Pre-Application Advice, Data Centre, Land North of Great Torrington (ref FPEM/0140/2025, 10 April 2025); Xlinks, Morocco-UK Power Project Consultation Report (Doc Ref EN010164/0000805.1), records of public consultation events at Alverdiscott, 27 April 2023 and 21 May 2024; Companies House filing for Stratus Data Developments Limited (incorporated December 2024), as referenced in Devon Data Centre and BESS Action Group correspondence to Xlinks, 27 July and 10 August 2026, unchallenged in Xlinks' reply.



Zone of Theoretical Visibility for DC5, one of the two 40-metre buildings (Doc Ref 319327-ADW01-Draft v0.1 ZTV, Figure L6, Arthian Ltd, 18 November 2024). The notes confirm the 40m building height and exact ground levels used to run this model.