XLINKS' MOROCCO-UK POWER PROJECT

Environmental Statement

Volume 2, Appendix 2.1: Historic Environment Desk-Based Assessment Part 1

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Glossary

Term	Meaning
Abnormal Indivisible Loads	Loads or vehicles that exceed maximum vehicle weight, axle weight or dimensions as set out in the Road Vehicles (Construction and Use) Regulations 1986 as amended.
Alverdiscott Substation	The existing National Grid Electricity Transmission substation at Alverdiscott, Devon, which comprises 400 kV and 132 kV electrical substation equipment.
Applicant	Xlinks 1 Limited.
Bronze Age	The time period 1,800 to 600 BC.
Conservation (for heritage policy)	The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.
Conservation Area	An area designated by a local authority as being of special architectural or historic interest.
Converter Site	The Converter Site is proposed to be located to the immediate west of the existing Alverdiscott Substation site in north Devon. The Converter Site would contain two converter stations (known as Bipole 1 and Bipole 2) and associated infrastructure, buildings and landscaping.
Converter station	Part of an electrical transmission and distribution system. Converter stations convert electricity from Direct Current to Alternating Current, or vice versa.
Designated heritage asset	A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
Early Medieval	The time period AD 410 to 1066.
Environmental Impact Assessment	The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project, through comparison with the existing and projected future baseline conditions.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
Heritage asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.
Historic environment	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.
Historic Landscape Characterisation	An aspect of more general landscape characterisation that seeks to provide an additional element of 'time-depth', allowing the historic evolution of the landscape to be perceived and understood.
Iron Age	The time period 600 BC to AD 43.
Landfall	The proposed area in which the offshore cables make landfall in the United Kingdom (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Cornborough Range, Devon, between Mean Low Water Springs and the transition joint bays inclusive of all construction works, including the offshore and onshore cable routes, and landfall compound(s).
Listed building	A building or structure placed on a statutory 'List' of Buildings of Special Architectural or Historic Interest. There are three grades of listing, which are: • Grade I (these are of exceptional interest);

Term	Meaning
	• Grade II* (these are particularly important); and • Grade II (these are of special interest).
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils. The relevant Local Authorities for the Proposed Development are Devon County Council and Torridge District Council.
Medieval Period	The time period AD 1066 to 1485.
Mesolithic Period	The time period 12,,000 to 4,000 BC.
Modern Period	The time period AD 1800 to present.
National Grid Electricity Transmission	National Grid Electricity Transmission owns and maintains the electricity transmission network in England and Wales.
National Heritage List for England	List of nationally designated heritage assets maintained by Historic England.
National Policy Statements	The current national policy statements published by the Department for Energy Security and Net Zero in 2023 and adopted in 2024.
Neolithic Period	The time period 4000 to 1800 BC.
Onshore HVDC Cable Corridor	The proposed corridor within which the onshore High Voltage Direct Current cables would be located.
Onshore Infrastructure Area	The proposed infrastructure area within the Order Limits landward of Mean High Water Springs. The Onshore Infrastructure Area comprises the transition joint bays, onshore HVDC Cables, converter stations, HVAC Cables, highways improvements, utility diversions and associated temporary and permanent infrastructure including temporary compound areas and permanent accesses.
Order Limits	The area within which all offshore and onshore components of the Proposed Development are proposed to be located, including areas required on a temporary basis during construction (such as construction compounds).
Policy	A set of decisions by governments and other political actors to influence, change, or frame a problem or issue that has been recognized as in the political realm by policy makers and/or the wider public.
Post-medieval Period	The time period AD 1486 to 1899.
Prehistoric Period	The general term used for the time period before the Roman invasion of AD 43.
Proposed Development	The element of Xlinks' Morocco-UK Power Project within the UK. The Proposed Development covers all works required to construct and operate the offshore cables (from the UK Exclusive Economic Zone to Landfall), Landfall, onshore Direct Current and Alternating Current cables, converter stations, and highways improvements.
Registered Park and Garden	A park and/or garden of special historic interest placed on a non-statutory Register. There are three grades of registration: • grade I – these are of exceptional interest; • grade II* - these are particularly important; and • grade II – these are of special interest.
Roman Period	The time period AD 43 to 410.
Scheduled Monument	A heritage asset given legal protection by being placed on a 'Schedule' of monuments.
Setting of a historic asset	The setting of an historic asset includes the surroundings in which it is understood, experienced and appreciated embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Term	Meaning
Significance (for heritage policy)	The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.
Study area	This is an area which is defined for each environmental topic which includes the Order Limits as well as potential spatial and temporal considerations of the impacts on relevant receptors. The study area for each topic is intended to cover the area within which an impact can be reasonably expected.
The national grid	The network of power transmission lines which connect substations and power stations across Great Britain to points of demand. The network ensures that electricity can be transmitted across the country to meet power demands.
Xlinks' Morocco UK Power Project	The overall scheme from Morocco to the national grid, including all onshore and offshore elements of the transmission network and the generation site in Morocco (referred to as the 'Project').

Acronyms

Acronym	Meaning
AD	Anno Domini (after the birth of Christ)
AIL	Abnormal Indivisible Load
AOD	Above Ordnance Datum
BC	Before Christ
CIfA	Chartered Institute for Archaeologists
DBA	Desk-based Assessment
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
EIA	Environmental Impact Assessment
ES	Environmental Statement
GPA	Good Practice Advice
HER	Historic Environment Record
HLC	Historic Landscape Characterisation
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
LiDAR	Light Detection and Ranging
NHLE	National Heritage List for England
NPPF	National Planning Policy Framework
NPS	National Policy Statement
OS	Ordnance Survey
PPG	Planning Practice Guidance
UK	United Kingdom
ZTV	Zone of Theoretical Visibility

Units

Units	Meaning
ha	Hectares
km	Kilometre
kV	Kilovolt
m	Metre
m AOD	Metres Above Ordnance Datum

1 HISTORIC ENVIRONMENT DESK BASED ASSESSMENT

1.1 Introduction

1.1.1 This document forms Volume 2, Appendix 2.1 of the Environmental Statement (ES) prepared for the United Kingdom (UK) elements of the Xlinks' Morocco-UK Power Project (the 'Project'). For ease of reference, the UK elements of the Project are referred to hereafter as the 'Proposed Development', which is the focus of this ES. The ES presents the findings of the Environmental Impact Assessment (EIA) process for the Proposed Development.

1.1.2 This historic environment technical report sets out the results of a historic environment desk-based assessment (DBA) that has been undertaken with regards to the onshore elements of the Proposed Development, which comprise the following.

- Landfall at Cornborough Range to the south of Westward Ho! in north Devon.
- A Converter Site to the immediate west of the National Grid Electricity Transmission (NGET) Alverdiscott Substation – the Converter Site would contain two converter stations.
- An onshore High Voltage Direct Current (HVDC) Cable Corridor approximately 14.5 km in length, that links the Landfall to the Converter Site.
- The High Voltage Alternating Current (HVAC) Cable Corridors, approximately 1.2 km in length, that link the converter stations to the national grid.
- Abnormal Indivisible Load (AIL) route works.

1.1.3 The above elements are included within the Order Limits together with the construction compounds, accesses and other land that will be temporarily or permanently occupied during the construction, operation and maintenance and decommissioning of the Proposed Development.

1.1.4 The DBA has examined data from a number of sources in order to identify known historic environment resources and also to identify the potential for the presence of such resources within the Proposed Development.

1.1.5 This report presents the results of the DBA and is accompanied by gazetteers of known historic environment resources (**Annex A** to **Annex D**) and supporting graphical data (see **Figure 1** to **Figure 9**).

1.1.6 A summary of the information presented in this DBA, supplemented by information gained from a phased programme of archaeological fieldwork, is used to describe the historic environment baseline within Volume 2, Chapter 2: Historic Environment of the ES. The programme of archaeological fieldwork is described in **paragraphs 1.4.71** to **1.4.82** of this Appendix.

1.2 Methodology

Sources of Information

1.2.1 The DBA has examined data from a number of sources in order to identify known historic environment resources and also to identify the potential for the presence of such resources within the agreed historic environment study area.

1.2.2 The following sources have been reviewed:

- The regional Historic Environment Record (HER) maintained by Devon County Council.
- Historic England's National Heritage List for England (NHLE) for information on World Heritage Sites, Scheduled Monuments, Listed Buildings, and Registered Parks and Gardens of Historic Interest (Historic England, 2024).
- 19th century Tithe mapping, county maps and Ordnance Survey (OS) 6'' (to the mile) mapping.
- British Geological Survey data online (British Geological Survey, 2024).
- ArchSearch (data held by the Archaeology Data Service, 2024).
- Environment Agency Light Detection and Ranging (LiDAR) data.
- Portable Antiquities Scheme.
- Documents held by Devon Heritage Centre and Devon Archives and Local Studies.
- Historic England's online database of aerial photographs.

Study Area

1.2.3 The historic environment study area is made up as follows.

- The 5 km settings study area - a circle with a radius of 5 km centred on the Converter Site (for all categories of designated heritage assets). This enables the identification of designated heritage assets whose settings may change following the construction of the converter stations and associated landscaping.
- The 1 km settings study area - a zone extending for 1 km from the edge of the Onshore Infrastructure Area (excluding the AIL routes) for all categories of designated heritage assets. This enables the identification of designated heritage assets whose settings may change during construction of the Proposed Development. It is limited to 1 km as there would be no above ground visible infrastructure in place following construction, therefore any impacts would only occur during the construction phase.
- The 500 m historic environment study area - a zone extending for 500 m from the edge of the Onshore Infrastructure Area (excluding the AIL routes) for non-designated heritage assets including buried archaeological remains. This enables the identification of the general potential for buried archaeological remains and deposits of geoarchaeological and palaeoenvironmental interest to be present within the Onshore Infrastructure Area. It also enables the identification of other non-designated heritage assets such as locally listed buildings within this defined study area.

1.2.4 The AIL routes incorporated within the Proposed Development have been scoped out of assessment within this document and within Volume 2, Chapter 2: Historic Environment of the ES. This is due to construction proposals associated with the AIL routes being limited to minor works to the existing carriageway and, as such, will not generate any impacts to adjacent heritage assets. As a result of the AIL routes being scoped out of assessment, the historic environment study areas will focus on those elements of the Proposed Development listed above and will not incorporate the AIL routes.

1.2.5 The study areas described above have been agreed through the Scoping process and are identified on **Figure 1.**

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Notes
1. This plan is scaled at paper size A3. If received electronically it is the recipients responsibility to print to the correct scale. Only written dimensions should be used.

Legend

- Order Limits
- Converter Site
- Construction Compound
- 5km settings study area
- 1km settings study area

Rev	Description	By		
P01	FINAL	MP	MB	14.11.24

Xlinks

Client: Xlinks 1 Limited

Project: Xlinks' Morocco-UK Power Project

Title: Historic Environment Study Area

Status	Scale @ A3	Date Created
FINAL	1:50,000	Nov 2024

Figure Number: **1**

Rev: **P01**

www.xlinks.co

0 500 1,000 m

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N:\28000-28999\28125 - Xlinks Cable Route\Figures\Mapping\GIS\Projects\11809-0107-02 location and buffers.mxd

Baseline Methodology

1.2.6 The DBA has been prepared with reference to appropriate guidance and 'good practice' advice including that presented in the Chartered Institute for Archaeologists' (CIfA) *Standard and Guidance for Historic Environment Desk Based Assessment* (CIfA, 2020).

1.2.7 The historic environment study area was used for the purposes of data collection and, where appropriate, material beyond the historic environment study area has also been examined.

1.2.8 The appraisal of desk-based information has been augmented by a site walkover undertaken in May 2022. The purpose of the site walkover was to assess existing ground conditions, topography, and land use within the historic environment study area which may influence the heritage assessment and any fieldwork surveys. The walkover also aimed to establish the presence of any non-designated historic buildings, potential earthwork features, and any above ground features of archaeological interest within the land required for the Proposed Development. No unrecorded historic buildings or archaeological features were observed.

1.2.9 Two main sets of archaeological geophysical survey data have been utilised to assist in establishing the archaeological potential of the land within the Onshore Infrastructure Area. The first of these geophysical surveys was undertaken in advance of the proposed Atlantic Array Offshore Windfarm scheme. In some locations, the Onshore HVDC Cable Corridor shares a similar course to that of the Atlantic Array onshore cable corridor. The results of the geophysical survey along the Atlantic Array onshore cable corridor (Stratascan, 2011) have been incorporated into the HER maintained by Devon County Council.

1.2.10 Where the course of the Onshore HVDC Cable Corridor for the Proposed Development varies from that of the Atlantic Array onshore cable corridor, additional geophysical survey has been commissioned specifically for the Proposed Development. The results of this geophysical survey are presented in Volume 2, Appendix 2.2: Onshore Geophysical Survey Report of the ES.

1.2.11 A geophysical survey was also undertaken previously within the Converter Site in association with an application for a solar farm. The results of this survey (Magnitude Surveys, 2020) have been examined within this DBA.

1.2.12 A programme of archaeological trial trenching was undertaken along the Atlantic Array onshore cable corridor (Oxford Archaeology, 2012). The results of this work, where appropriate, have been examined within this DBA, as have the results of a similar programme of archaeological trial trenching undertaken for the solar farm within the Converter Site (Oxford Archaeology, 2022).

1.2.13 A programme of archaeological trial trenching has commenced along the Onshore HVDC Cable Corridor. The results of all trial trenching completed thus far are presented as Volume 2, Appendix 2.3: Preliminary Trial Trenching Report of the ES.

1.3 Historic Environment Legislation, Policy and Guidance

Legislation

1.3.1 Statutory protection for archaeology is principally enshrined in the Ancient Monuments and Archaeological Areas Act 1979. Nationally important archaeological sites are listed in a Schedule of Monuments and are accorded statutory protection.

1.3.2 The Planning (Listed Buildings and Conservation Areas) Act 1990 and the Town and County Planning Act 1990 provide statutory protection to listed buildings and their settings, and include provisions in relation to designating and to preserving or enhancing the character and appearance of Conservation Areas.

1.3.3 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that '*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*'.

1.3.4 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that where a development includes buildings or land within a Conservation Area *'…. special attention shall be paid to the desirability of preserving or enhancing the character and appearance of that area*'.

1.3.5 Historic Parks and Gardens, and Historic Battlefields, have received recognition under the National Heritage Acts 1980, 1983 and 2002. Such sites are described on registers maintained by Historic England for the Department for Culture, Media and Sport, but such a designation does not afford statutory protection.

1.3.6 The Protection of Military Remains Act 1986 sets out protective measures for vessels which were sunk or stranded while in military service and for aircraft which crashed while in military service. There is a general prohibition on the disturbance or removal of remains covered by this Act unless a licence has been granted by the Secretary of State.

1.3.7 The Hedgerows Regulations 1997 set out criteria for the identification of 'Important Hedgerows'; these include several historic environment criteria. According to the Hedgerow Regulations 1997, a hedgerow can be defined as 'important' if it has existed for 30 years or more and falls into one of the criteria listed in Part II of Schedule 1. Consent from the local planning authority is usually required for the removal of an 'Important Hedgerow', however such removal is deemed to be permitted where a Development Consent Order (DCO) has been granted.

1.3.8 The Infrastructure Planning (Decisions) Regulations 2010 require decision-makers to have regard for the desirability of:

- preserving listed buildings and their settings or any features of special architectural or historic interest that they possess;
- preserving or enhancing the character or appearance of conservation areas; and
- preserving scheduled monuments and their settings.

National Planning Policy

National Policy Statements

1.3.9 National Policy Statements (NPSs) designated under the Planning Act 2008 establish the national need case for energy infrastructure, including transmission infrastructure. There are currently six energy NPSs, three of which contain policy relevant to the Proposed Development:

- the Overarching NPS for Energy (NPS EN-1) which sets out the UK Government's policy for the delivery of major energy infrastructure (Department for Energy Security and Net Zero (DESNZ), 2023a);
- the NPS for Renewable Energy Infrastructure (NPS EN-3) (DESNZ, 2023b); and
- the NPS for Electricity Networks Infrastructure (NPS EN-5) (DESNZ, 2023c).

1.3.10 A summary of those policies within these NPSs relevant to this DBA is provided below.

Overarching NPS for Energy (EN-1)

1.3.11 With regard to the historic environment, NPS EN-1 (Department for Energy Security & Net Zero 2023a) states '*The construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment*' (Paragraph 5.9.1). The NPS goes on to identify that '*Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called 'heritage assets'. Heritage assets may be buildings, monuments, sites, places, areas or landscapes, or any combination of these. The sum of the heritage interests that a heritage asset holds is referred to as its significance. Significance derives not only from a heritage asset's physical presence'.*

1.3.12 As identified within the NPS, '*Some heritage assets have a level of significance that justifies official designation*' (paragraph 5.9.4). The following categories of designated heritage assets are noted:

- World Heritage Sites;
- Scheduled Monuments;
- Listed Buildings;
- Protected Wreck Sites;
- Protected Military Remains;
- Registered Parks and Gardens;
- Registered Battlefields;
- Conservation Areas; and
- Registered Historic Landscapes (Wales only).

1.3.13 Non-designated heritage assets of archaeological interest which are demonstrably of equivalent interest to Scheduled Monuments will be subject to any policies that apply to designated heritage assets (paragraphs 5.9.5 and 5.9.6). For other non-designated heritage assets, the Secretary of State should consider impacts on

such assets on the basis of clear evidence that the assets '*have a significance that merits consideration*' (paragraph 5.9.7).

1.3.14 The NPS advises that '*As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate to the importance of the heritage assets affected by the proposed development, and no more than is sufficient to understand the potential impact of the proposal on their significance*' (paragraph 5.9.10), before going on to state '*Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact*' (paragraph 5.9.11).

1.3.15 With regard to decision making, NPS EN-1 advises that '*In considering the impact of a proposed development on any heritage assets, the Secretary of State should consider the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal*' (paragraph 5.9.24). Also '*Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional*' (paragraph 5.9.29), and '*Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional*' (paragraph 5.9.30).

1.3.16 Importantly, '*Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use*' (paragraph 5.9.32). Additionally, '*Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply*:

- *the nature of the heritage asset prevents all reasonable uses of the site.*
- *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation.*
- *conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible.*
- *the harm or loss is outweighed by the benefit of bringing the site back into use*' (paragraph 5.9.31).

NPS for Renewable Energy Infrastructure (EN-3) and NPS for Electricity Networks Infrastructure (EN-5)

1.3.17 NPS EN-3 and NPS EN-5 do not provide any additional policies or advice specific to the historic environment over and above those presented within NPS EN-1. However, a section in EN-5 (DESNZ, 2023c) regarding landscape and visual

effects (paragraphs 2.9.7 – 2.9.25) advises that there are matters regarding the undergrounding of electricity cables, including impacts on heritage assets, that may have to be taken in account when considering this action as an alternative to the construction and use of an overhead line.

National Planning Policy Framework

1.3.18 The principal national planning policy is the National Planning Policy Framework (NPPF) which was last updated in December 2023 (Ministry of Housing, Communities and Local Government, 2023).

1.3.19 The NPPF has been updated and the draft version was published for consultation on 30 July 2024 with the consultation period ending on 24 September 2024 (Ministry of Housing, Communities and Local Government, 2024). The draft NPPF includes similar provisions as the current designated NPPF. The draft NPPF has been reviewed and there are no material updates for Historic Environment.

1.3.20 The NPPF sets out the Government's planning policies for England and how these are to be applied. It states that planning law requires applications to be determined in accordance with the Development Plan for the relevant area unless material considerations indicate otherwise.

1.3.21 Paragraph 2 of the NPPF states that it *'… is a material consideration in planning decisions*'. However, paragraph 5 additionally advises '*The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as other matters that are relevant (which may include the National Planning Policy Framework*'.

1.3.22 Policies regarding the historic environment are set out in Chapter 16 of the NPPF and include the following:

'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance' (paragraph 200).

'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance' (paragraph 205).

'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- *grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- *assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional*' (paragraph 206).

'Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- *the nature of the heritage asset prevents all reasonable uses of the site; and*
- *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- *conservation by grant-funding or some form or not for profit, charitable or public ownership is demonstrably not possible; and*
- *the harm or loss is outweighed by the benefit of bringing the site back into use*' (paragraph 207).

'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use' (paragraph 208).

'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset' (paragraph 209).

Local Planning Policy

1.3.23 The onshore elements of the Proposed Development are located within the administrative area of Torridge District Council (and Devon County Council at county level). The relevant local plan policy comprises the North Devon and Torridge Local Plan 2011-2031 (North Devon Council & Torridge District Council, 2018). Policy ST15 addresses the issue of Conserving Heritage Assets and states:

'*Great weight will be given to the desirability of preserving and enhancing northern Devon's historic environment by:*

(a) conserving the historic dimension of the landscape;

(b) conserving cultural, built, historic and archaeological features of national and local importance and their settings, including those that are not formally designated;

(c) identifying and protecting locally important buildings that contribute to the area's local character and identity; and

(d) increasing opportunities for access, education and appreciation of all aspects of northern Devon's historic environment, for all sections of the community.'

1.3.24 Policy DM07 addresses the management of the historic environment:

(1) 'All proposals affecting heritage assets should be accompanied by sufficient information, in the form of a Heritage Statement, to enable the impact of the proposal on the significance of the heritage asset and its setting to be properly

assessed. As part of such an assessment, consideration should be given, in order of preference, for avoiding any harm, providing enhancement, then minimising and mitigating any harm.

(2) Proposals which conserve and enhance heritage assets and their settings will be supported. Where there is unavoidable harm to heritage assets and their settings, proposals will only be supported where the harm is minimised as far as possible, and an acceptable balance between harm and benefit can be achieved in line with the national policy tests, giving great weight to the conservation of heritage assets.

(3) Proposals to improve the energy efficiency of, or to generate renewable energy from, historic buildings or surrounding these heritage assets will be supported where:

(a) there is no significant harm or degradation of historic fabric including traditional windows; and

(b) *equivalent carbon dioxide emission savings cannot be achieved by alternative siting or design that would have a less severe impact on the integrity of heritage assets.*'

Guidance

1.3.25 The NPPF is supported by the Planning Practice Guidance (PPG) (Department for Levelling Up, Housing and Communities and Ministry of Communities and Local Government, 2023), which was first published online in 2014 and which contains a section on Historic Environment that was last updated in July 2019. The PPG provides advice on specific issues such as '*What is 'significance*' and '*What is the setting of a heritage asset and how should it be taken into account?*'

1.3.26 The PPG reiterates that the conservation of heritage assets in a manner appropriate to their significance is a core planning principle, requiring a flexible and thoughtful approach. Furthermore, it highlights that neglect and decay of heritage assets is best addressed through ensuring they remain in active use that is consistent with their conservation. Importantly, the guidance states that if complete, or partial loss of a heritage asset is justified, the aim should then be to capture and record the evidence of the asset's significance and make the interpretation publicly available.

1.3.27 Key elements of the PPG relate to assessing harm to the significance of heritage assets. An important consideration should be whether the proposed works adversely affect a key element of the heritage asset's special architectural or historic interest. Additionally, it is the degree of harm, rather than the scale of development, that is to be assessed.

1.3.28 The level of 'substantial harm' is considered to be a high bar that may not arise in many cases. Essentially, whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case. Importantly, harm may arise from works to the asset or from development within its setting.

1.3.29 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the three NPSs and the NPPF, by current Development Plan Policy and by other material considerations.

1.3.30 The NPPF and PPG are additionally supported by four Good Practice Advice (GPA) documents published by Historic England: GPA1: The Historic Environment in Local Plans (Historic England, 2015a); GPA 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015b); GPA3: The Setting of Heritage Assets (Historic England, 2017) and GPA4: Enabling Development and Heritage Assets (Historic England, June 2020).

1.3.31 GPA2: Managing Significance in Decision -Taking in the Historic Environment (Historic England, 2015b) provides detailed guidance on how the significance of heritage assets can be determined, and how decision-takers should assess proposals for developments which would affect this significance.

1.3.32 In accordance with the NPPF, GPA2 advises that '*the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve of investigate the asset needs to be proportionate to the significance of the heritage assets affected and the impact on that significance*' (Paragraph 3).

1.3.33 It is explained that '*The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance. The significance of a heritage assets is defined as 'the sum of its archaeological, architectural, historic and artistic interest*' (Paragraph 4).

1.3.34 The document goes on to explain (Paragraph 6) that a staged approach to assessment and decision-taking would be to:

- '*Understand the significance of the affected assets*
- *Understand the impact of the proposal on that significance*
- *Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF*
- *Look for opportunities to better reveal or enhance significance*
- *Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change*
- *Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.*'

1.3.35 Specifically with regard to the significance of a heritage asset, GPA2 advises that it is important to understand not just the nature of the significance but also the extent and level of significance (Paragraphs 8-10).

1.3.36 Further advice on assessing the significance of heritage assets has been published by Historic England in their Advice Note 12 Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England, 2019). This explains how significance should be assessed as part of a staged approach to decision-making.

1.3.37 GPA3: The Setting of Heritage Assets (Historic England, 2017) provides detailed guidance on understanding the concept of setting and how it may contribute the significance of heritage assets. The document repeats the NPPF definition of setting and goes on to explain that '*Setting itself is not a heritage designation, although land comprising a setting may itself be designated. Its importance lies on what it contributes to the significance of a heritage asset or to the ability to appreciate that significance*' (paragraph 9).

1.3.38 The Historic England guidance document (Historic England, 2017) makes the following points:

- a setting does not have a fixed boundary as it may change;
- extensive heritage assets such as landscapes or townscapes can include many heritage assets and their nested and overlapping settings, as well as having a setting of their own;
- the setting of a heritage asset may reflect the character of the wider townscape or landscape in which it is situated, whether fortuitously or by design;
- the importance of a setting of a heritage asset is what it contributes to the significance of the asset;
- where the significance of a heritage asset has been compromised in the past by unsympathetic development within its setting, consideration still needs to be given as to whether additional change would further detract from (or possibly enhance) the significance of the asset; and
- the contribution made by its setting to the significance of a heritage asset does not depend on public access.

1.3.39 The document deals with the issue of setting and proportionate decision taking. It advises a five-stage approach:

1. identify which heritage assets and their settings are affected;
2. assess to what degree these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
3. assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
4. explore the way to maximise enhancement and avoid or minimise harm; and
5. make and document the decision and monitor outcomes.

1.3.40 Although assessments of changes within the settings of heritage assets can involve non-visual issues such as noise, it is more usually the visual aspects of a development that form the major part of the assessment.

1.3.41 The existence of direct lines of sight between the heritage asset and the Proposed Development is an important factor in judging the visual impact of the development. However, it is possible for changes within the setting to occur even when such a relationship does not exist. For example, views towards a listed building from a frequently visited location, such as a park or a public footpath, may be affected by the presence of a larger development, even if the development is not directly visible from the building itself.

1.3.42 A checklist provided in GPA3 (page 11) identifies several factors that may be relevant with regard to understanding the significance of a heritage asset and the contribution made by its setting. A second checklist (page 13) identifies a number of potential aspects of a proposed development which may be relevant in understanding the implications for the significance of heritage assets.

1.3.43 GPA4 (Historic England, 2020) provides advice regarding enabling development, which is defined as development that would not be in compliance with local and/or national policies, and not normally given planning permission, except for the fact that it would secure the future conservation of a heritage asset.

1.3.44 Additional, more detailed guidance on specific aspects of the historic environment is provided in a series of Historic England Advice Notes.

1.4 Baseline Environment

1.4.1 Identified historic environment sites and features within the defined historic environment study area are shown on **Figure 2** to **Figure 4** as Sites 1-218. Further information on these historic environment sites and features is provided within **Annex A** to **Annex D.**

Summary of Geology and Topography

1.4.2 The Landfall is situated at Cornborough Range on the north Devon coast, to the south-west of Cornborough and approximately 4 km west of Bideford. The basal geology at Landfall comprises mudstones and siltstones of the Bideford Formation, regularly incorporating roughly east-west aligned discrete outcrops of sandstone.

1.4.3 The Onshore HVDC Cable Corridor would initially be routed east from Landfall along a dry valley. It would then divert south at Rickard's Down over a sandstone ridge, passing to the east of Chaltaborough and to the west of the village of Abbotsham, crossing some minor roads along this section of the route. This area lies on gentle, undulating land which continues to rise to the east. The Onshore HVDC Cable Corridor would cross Kenwith Stream, which is situated just south of Rickard's Down, flowing from south west to north east towards the River Torridge. Kenwith Stream sits on a geological boundary with the Bideford Formation located to the north of the stream, whilst the Bude Formation (mudstone and siltstone with discrete outcrops of sandstone) is predominant as the Onshore HVDC Cable Corridor continues south and reaches the A39 road just to the west of the Abbotsham Cross roundabout.

1.4.4 The Onshore HVDC Cable Corridor continues south and then turns to run east towards the River Torridge, passing to the north of Winscott Barton and south of Littleham Court and the farms of Robin Hill and Lower Dunn. The route at this point aligns with a ridge of high ground at approximately 125 m Above Ordnance Datum (AOD). After Lower Dunn, the topography of the route is primarily associated with undulating ground found at the head of small, incised valleys draining to the north.

1.4.5 Following this, the Onshore HVDC Cable Corridor turns to run north east, passing north of West Ashridge Farm and south of Ashridge to approach the River Torridge crossing point. The route approaches the river to the south of the property of Rivercroft. The predominant basal geology in this area is still the mudstone and siltstone of the Bude Formation, although Crackington Formation (mudstone and siltstone) deposits are present adjacent to the River Torridge. With the exception of Tidal Flat Deposits (clay, silt and sand) present along the course of the River Torridge, no superficial deposits are recorded.

1.4.6 The Onshore HVDC Cable Corridor forms a wider corridor on the eastern side of the River Torridge, on the higher ground. The route then crosses fields to the south of East-the-Water, and runs eastwards towards Woodville Farm. Here it crosses Tennacott Lane before turning to the south east to run adjacent to and south of Gammaton Road.

1.4.7 The final section of the Onshore HVDC Cable Corridor passes to the south of the Gammaton Reservoirs and then turns to the north east to cross Gammaton Road. The route then continues in a north east direction before reaching the Converter Site.

1.4.8 With the exception of the steeply rising ground on the north eastern side of the River Torridge, the topography to the east of the river generally consists of even ground rising on a gentle gradient from *c*. 75 m AOD to *c*. 150 m AOD. The Bude Formation represents the predominant basal geology throughout, although the Crackington Formation is present to the south of Gammaton Road. No superficial deposits are recorded other than the Tidal Flat Deposits and small patches of terrace gravels along the eastern side of the River Torridge.

Designated Heritage Assets

1.4.9 The following section should be read in conjunction with **Annex A**, which contains the Gazetteer of Heritage Assets, as well as **Annex B** and **Annex C**. The heritage assets within the Gazetteer are assigned site numbers, which are referred to below.

Onshore HVDC Cable Corridor

1.4.10 The locations of designated heritage assets within the 1 km and 5 km settings study areas are shown on **Figure 2** and **Figure 3**. This includes the locations of Grade II listed buildings although these have not been allocated individual site numbers. Further information regarding the Grade II listed buildings is presented in **Annex B** and **Annex C**.

1.4.11 There are no World Heritage Sites, Protected Wrecks, Registered Battlefields or Conservation Areas within the defined study area.

1.4.12 There are four Scheduled Monuments within the 1 km settings study area. The earliest of these is an Iron Age defended settlement and Roman military camp near Higher Kingdon Barn (Site 2), located approximately 150 m from the Converter Site. Both the prehistoric settlement and the adjacent Roman camp survive as features visible on aerial photographs but with no visible surface expression. The Iron Age settlement lies on a south-facing slope and is defined by three ditches. The Roman marching camp survives as a rectangular enclosure immediately north east of (and possibly attached) to the enclosure and is defined by a single ditch up to 1.3 m wide, enclosing an area measuring approximately 140 m long by 115 m wide (Silvester, 1978). The camp extends across a natural knoll and then down the south-facing slope. The attribution of an Iron Age date for the enclosure and a Roman date for the adjacent camp is made on the basis of analogy with similar sites elsewhere in the country.

1.4.13 Part of the cross dyke known as Godborough Castle Scheduled Monument (Site 3), is located approximately 875 m to the east of the Proposed Development at the western end of the Onshore HVDC Cable Corridor. The construction period of the cross dyke is unknown and could be Prehistoric to Anglo-Saxon in date. The cross dyke survives as a *c*. 260 m long linear bank aligned north/south with a ditch on its western side. This ditch is up to 1.2 m deep in places and water-filled. There are at least two sizable mounds which measure up to 2 m high at its northern end, possibly the result of subsequent stone quarrying activity and a possible inturned entrance which has been partially backfilled.

1.4.14 The Scheduled 18th century garden feature at Kenwith Castle (Site 12) is located approximately 450 m to the east of the Proposed Development at the western end of the Onshore HVDC Cable Corridor. This knoll is a steep rocky outcrop which naturally resembles a Medieval motte (mound) and has been artificially modified by the cutting of a curving terrace around its foot which leads gently upwards and around in the form of a terrace. This terrace measures up to 2.8 m wide and extends from the north east part of the hill, making a gentle ascent on the north side round to the west.

1.4.15 The 19th century Hallsannery Limekiln near to Landcross Bridge is a Scheduled Monument (Site 13) and is located approximately 200 m to the south of the Onshore HVDC Cable Corridor, in the vicinity of the crossing point of the River Torridge. The limekiln is situated on the western bank of the river and survives as a rectangular, roughly-dressed, masonry structure with two brick-edged high pointed arches either side of a central round-headed arched passage. Two circular kiln pots, a crenellated wall around the kiln top, a rear charging ramp and a small quay are also associated with the monument. The central arch has been rendered and re-used as a boathouse and the kilns have been capped with concrete.

1.4.16 The Grade I listed Church of St Swithun (Site 4) is located at Littleham, approximately 600 m south of the Onshore HVDC Cable Corridor in the central part of the route. The church was constructed in the 13th century with the nave, chancel and transept dating from this period. The south aisle and west tower date to the 15th century. The church was subjected to a significant phase of restoration in the late 19th century.

1.4.17 The Grade II* listed Church of St Helen at Abbotsham (Site 6) is located approximately 200 m to the east of the Onshore HVDC Cable Corridor in the western part of the route. The church is also of 13th century origin and laid out on a cruciform plan. Most of the church fabric dates to this period, although the south chapel is of early 14th century date. Construction is of coursed slatestone rubble with ashlar dressings.

1.4.18 Old Ford is a Grade II* listed building (Site 7) located approximately 1 km to the north of the Onshore HVDC Cable Corridor in the central part of the route. The property was probably first constructed in the 14th century as a gentleman's house and was subsequently enhanced with the construction of a Medieval cross-wing. Further extensions and alterations took place in the 16th century and late 17th/early 18th century. The building is of stone rubble construction with a slate roof.

1.4.19 A second Grade II* listed building, the Church of Holy Trinity at Landcross (Site **205**), is located approximately 1 km to the south of the Onshore HVDC Cable Corridor in the central part of the route. The monument is a small church consisting of a nave and chancel dating to the 15th century. The walls are constructed using coursed slatestone rubble, with a roof of slate. There is an early 19th century bell cupola to the western side of the building.

Converter Site

1.4.20 **Figure 3** shows the locations of designated historic assets within the 5 km settings study area. The Zone of Theoretical Visibility (ZTV) has been overlaid onto these figures in order to establish which of these designated historic assets within the 5 km settings is theoretically intervisible with the Converter Site. Only

those designated assets which fall within the ZTV have been selected for discussion below or listed in **Annex A.**

1.4.21 In addition to Sites 2 and 13 which are discussed above as they are within the 1 km settings study area, there are six Scheduled Monuments within the 5 km settings study area and the Converter Site ZTV. The earliest is a group of barrows (burial mounds of probable Bronze Age date) located to the south of Haycroft and between 4 km and 4.2 km to the south east of the Converter Site (Sites **1**, 214, 215, 216, & 217). In relation to the two barrows that comprise Site 1, the western barrow is 23 m in diameter and 1.6 m high and the eastern is 24 m in diameter and 1.3 m high. Both barrows are probably broader and lower than originally constructed as they have been impacted by ploughing, which also may have obscured any ditch around each monument. The mounds were built mainly from clay and when partially excavated in the 19th century were found to contain charcoal, cremated bones and grave goods including a bronze dagger.

1.4.22 Site 214 comprises a round barrow, 18 m in diameter and 0.75 m high which possesses no visible ditch. Site 215 consists of a round barrow, 35 m in diameter and standing 1.05 m high. The associated ditch may have been obscured by ploughing, while the monument is also bisected by the B3232 road. The mound is built of clay and when partially excavated in the 19th century, charcoal and the possible remains of a cremation burial were found.

1.4.23 Site 216 is a bowl barrow, 22 m in diameter and 0.6 m high. Ploughing has denuded the original profile of the earthwork and probably obscured the accompanying ditch. The barrow was partially excavated in the 19th century and an oblong central cairn was found to lie over a flat stone, beneath which was a cremation burial in a pit. Site 217 represents a round barrow, 22.5 m in diameter by 1.5 m high. As with the other barrows within this group, ploughing over time has negatively affected both the earthwork and associated ditch. Excavation of the mound in the 19th century recorded that the earthwork was primarily constructed out of clay with dark sooty matter noted near the centre of the barrow.

1.4.24 The hillfort of Berry Castle (Site 218) is located approximately 2.6 km south of the Converter Site. The monument occupies the summit of a high hill overlooking the valleys of Huntshaw Water to the north and Darracott Brook to the south. The monument is aligned east-west and is defined by a rampart (bank) and an outer ditch which surround an internal area, 118 m long by 52 m wide. The rampart stands up to 5.3 m wide by 3.8 m high and the ditch measures up to 4 m wide and 2 m deep. There is a stony outer bank along part of the circuit, and this measures up to 3.6 m wide and 0.6 m high.

1.4.25 The Grade I listed Church of St Michael at Horwood (Site 5) is located approximately 1.9 km to the north of the Converter Site, with the chancel and nave likely to date to the 13th century. The church tower was added in the 15th century, and subsequently restored *c*. 1889. The building is constructed from stone rubble with ashlar dressings' it has a slate roof with crested ridge tiles.

1.4.26 The Grade II* listed Church of St Mary Magdalene at Huntshaw (Site 8) is located approximately 2.5 km to the south of the Converter Site. The church is thought to have been originally built in the 14th century, with the nave and west tower added by the end of the 15th century. Restoration works took place in the mid-19th century. Construction is mainly in coursed slatestone rubble with ashlar dressings, with slates forming the roof.

1.4.27 The Grade II* listed Church of St Thomas of Canterbury at Newton Tracey (Site 9) is located approximately 3 km to the north east of the Converter Site. In keeping

with many churches in this region, the church is thought to have been originally constructed in the 13th century using roughly coursed stone walls, consisting of chancel and nave, and later remodelled in the 15th century when the tower was added. It was restored in the mid-19th century.

1.4.28 Just on the edge of the ZTV, and approximately 1.7 km east of the Converter Site, is the Grade II* listed Church of All Saints at Alverdiscott (Site 10). The church is 15th century in date and is constructed of squared and coursed slatestone walls, with a slate roof. The north aisle was built in 1579, with the church restored in 1863.

1.4.29 Two other Grade II* listed Post-medieval buildings are located within the ZTV for the Converter Site. Hoopers Cottage at Horwood (Site 14) is located approximately 1.9 km north of the Converter Site and is recorded as being built around 1600. Unrendered stone rubble with cob is present in association with the upper storey, while the hipped roof is of thatch. The building was extended twice during the 20th century. The residential property of Southcott Barton at Westleigh (Site 15), also built around 1600, is located approximately 3.3 km to the north west of the Converter Site. The building has two storeys and is of rendered stone rubble and cob construction with slate roof.

1.4.30 Two Grade II* buildings are located approximately 2.4 km north west of the Converter Site. Eastleigh Manor House (Site 206) is a two-storey house constructed of stone rubble with ashlar dressings and slate roof, originally built in the late 15th or early 16th century. Eastleigh Barton (Site 207) is a farmhouse constructed in the early 16th century. The farmhouse is also of two storeys built from rendered stone rubble with slate roof.

1.4.31 Located within the ZTV, approximately 4.2 km to the north west of the Converter Site, are six Grade II* Listed Buildings located on Bridgeland Street in Bideford. These comprise the properties at Nos. 4/4A (Site 208), No. 31 (Site 209), Nos. 28/28A (Site 210), No. 27 (Site 211), the Masonic Hall (Site 212), and Lavington United Reform Church (Site 213). Sites 208 to 212 are similar in character, consisting of two to three storey residential buildings constructed in the early 1690s, of brick construction (rendered in the majority of examples) with slate roofs. All of the buildings have been variously modified over the subsequent centuries, with Site 212 now in use as a Masonic Hall, and the other buildings converted into shops, offices, and flats. The Lavington United Reform Church (Site 213) was constructed between 1856-9 and is a good example of a Decorated Gothic style church. The attached Primary hall and schoolroom dating to the first half of the 1920s demonstrate the church's ability to adapt to a changing social environment.

1.4.32 The southern edge of the Grade II* Registered Park and Garden of Tapeley Park (Site 11), located approximately 3.4 km to the north west of the Converter Site, is also just within the ZTV. The parkland has its origins in the 18th century when Commodore William Clevland acquired the estate. Augustus Clevland inherited the property in the early 19th century and was responsible for developing the lake and woodland garden in the valley north of the house. In 1894 Sir John Belcher was commissioned to remodel the house and lay out formal terraced gardens to the south. The estate has fine views to the north west of Appledore, Instow and the Torridge Estuary.

Notes
1. This plan is scaled at paper size A3. If received electronically it is the recipients responsibility to print to the correct scale. Only written dimensions should be used.

Legend

- Order Limits
- Converter Site
- 1km settings study area
- Construction Compound

Listed Buildings

Grade

- I
- II*
- II

- Registered Parks and Gardens
- Scheduled Monuments

P01	FINAL	MP	MB	14.11.24
Rev	Description	By	NB	03.10.24

Xlinks

Client: Xlinks 1 Limited

Project: Xlinks' Morocco-UK Power Project

Title: Designated Heritage Assets within the 1km settings study area

Status	Scale @ A3	Date Created
FINAL	1:40,000	Nov 2024

Figure Number: **2**

Rev: **P01**

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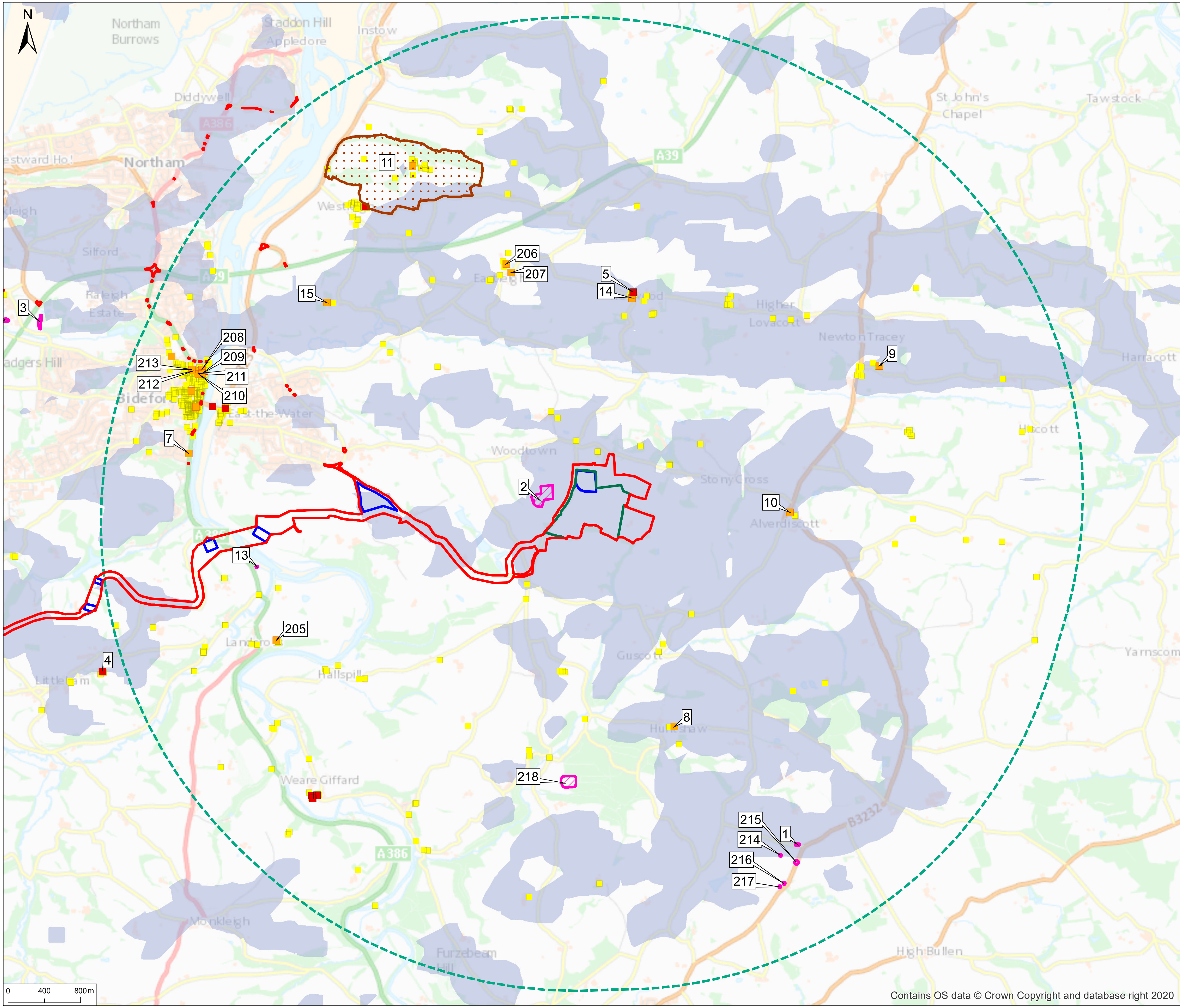

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Notes

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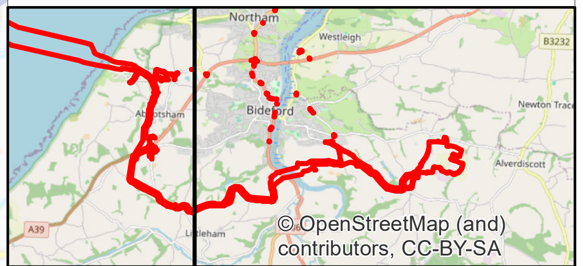
Legend

- Order Limits
- Converter Site
- 5km settings study area
- Construction Compound

Listed Buildings

Grade

- I
- II*
- II
- Registered Parks and Gardens
- Scheduled Monuments
- ZTV of converter stations



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P01	FINAL	MP	MB	23.10.24
Rev	Description	By	NB	03.10.24

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Client Xlinks 1 Limited

Project Xlinks' Morocco-UK Power Project

Title Designated Heritage Assets within the 5km settings study area

Status	Scale @ A3	Date Created
FINAL	1:40,000	Nov 2024

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Legend

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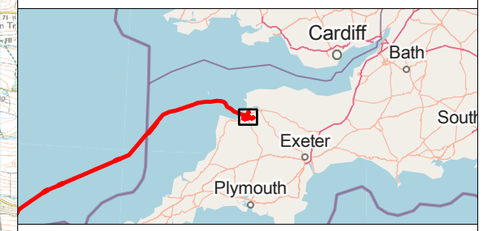
- Converter Site
- Map Frames



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P01	FINAL	SHB	MB	18.11.24

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Client: Xlinks 1 Limited

Project: Xlinks' Morocco-UK Power Project

Title: Non-designated heritage assets within the 500m historic environment study area Index Page

Status: FINAL

Scale @ A3: 1:45,000

Date Created: Nov 2024

Figure Number: **4**

Rev: **P01**

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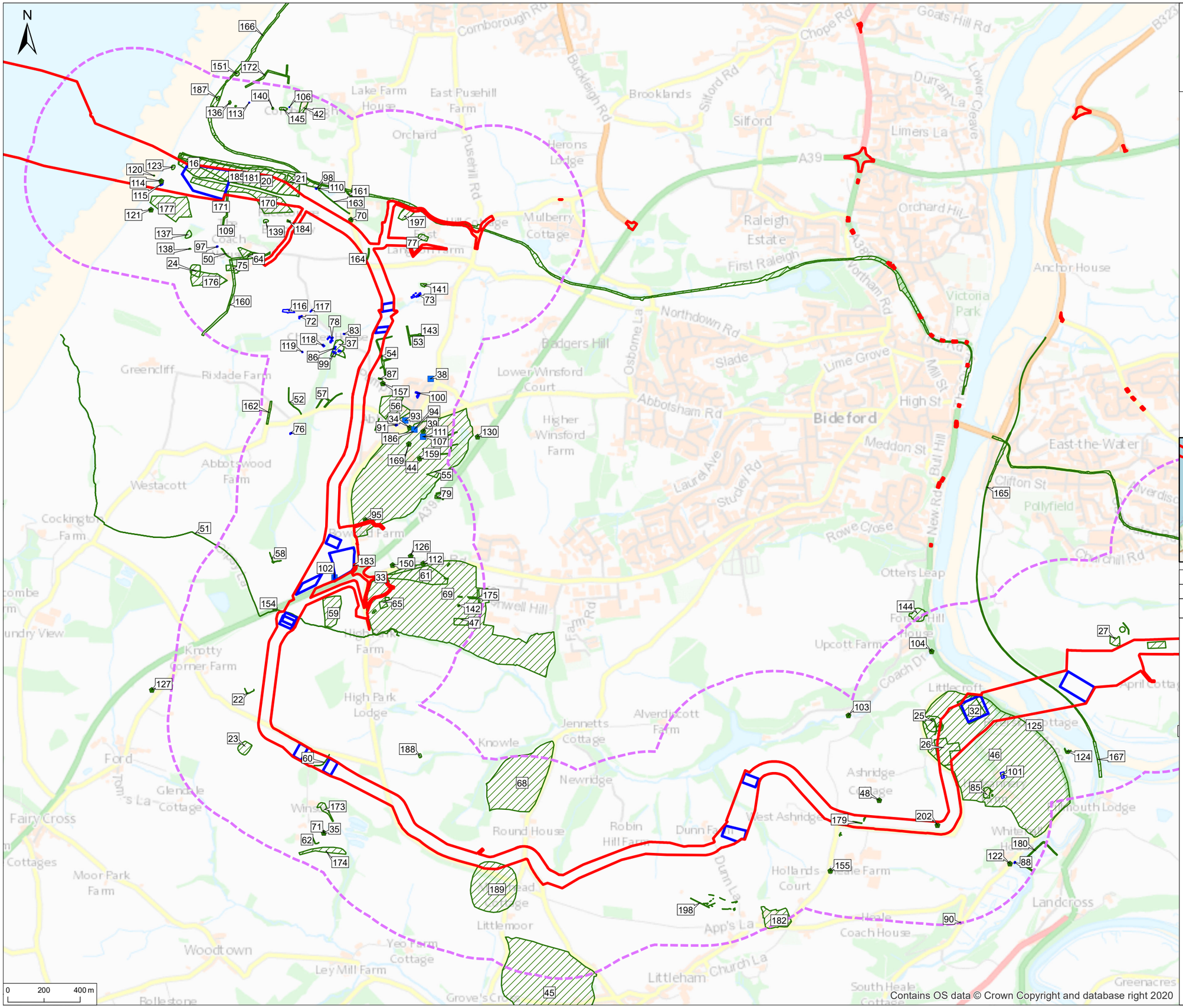

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Legend

- Order Limits
- 500m historic environment study area
- Construction Compound

HER Records Points

- Monuments
- Buildings

HER Records Polygons

- Monuments
- Buildings

Rev	Description	By		
P01	FINAL	MP	MB	14.11.24

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Client: Xlinks 1 Limited

Project: Xlinks' Morocco-UK Power Project

Title: Non-designated heritage assets within the 500m historic environment study area (sheet 1)

Status	Scale @ A3	Date Created
FINAL	1:20,000	Nov 2024

Figure Number: **4a**

Rev: **P01**

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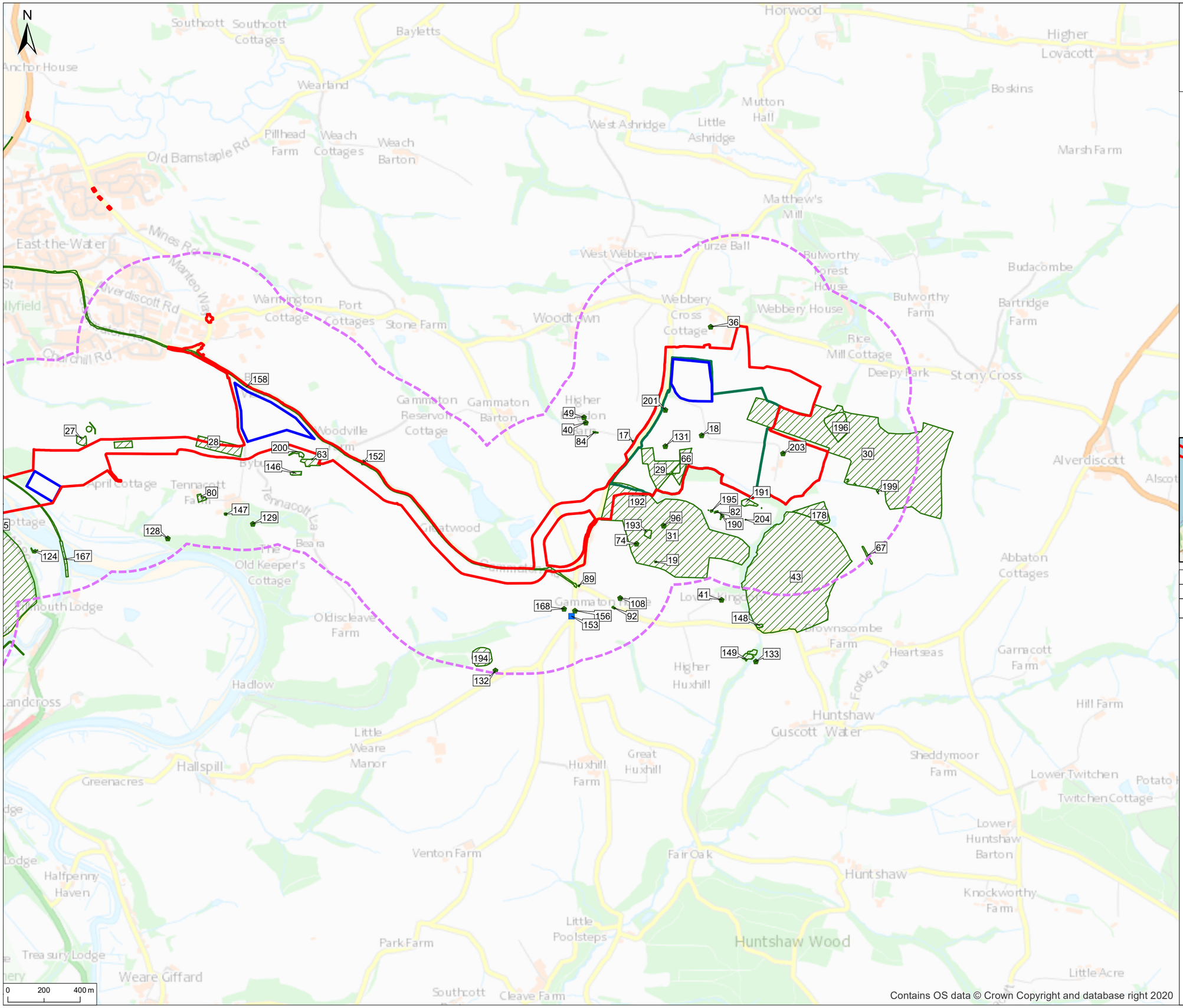

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Legend

- Order Limits
- 500m historic environment study area
- Converter Site
- Construction Compound

HER Records Points

- Monuments
- Buildings

HER Records Polygons

- Monuments

Rev	Description	By	MB	03.10.24
P01	FINAL	MP	MB	14.11.24

Client: Xlinks 1 Limited

Project: Xlinks' Morocco-UK Power Project

Title: Non-designated heritage assets within the 500m historic environment study area (sheet 2)

Status	Scale @ A3	Date Created
FINAL	1:20,000	Nov 2024

Figure Number: **4b**

Rev: **P01**

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Prehistoric (900,000 BC to AD 43) and Roman (AD 43 to 410)

1.4.33 The earliest known archaeological evidence for human activity in the general area is mainly confined to findspots of lithic material (worked stone tools), the majority of which are associated with fluvial deposits such as river gravels. Sites with evidence of activity and occupation are mostly cave sites, predominantly now in coastal locations on the south coast of Devon. Evidence for Mesolithic activity is dominated by surface scatters which incorporate later material including some distinctive Neolithic types. However, this latter period also saw the development of settlement and agriculture along with the construction of monuments such as stone and timber circles. Visible remains of Bronze Age activity are mostly in the form of burial monuments (such as round barrows) or ceremonial sites such as stone circles and stone rows.

1.4.34 Within the defined study area, the earliest evidence for human activity derives from an extensive scatter of Prehistoric worked flints (Site 16) located within the western part of the Onshore HVDC Cable Corridor at the Cornborough Sewage Treatment Works. The majority of the 1,785 artefacts recovered were dated to the Mesolithic period with tools including geometric microliths and microdenticulates, although some Neolithic material was also thought to be present (Reed, 1995).

1.4.35 Aerial photographic analysis has identified a possible Bronze Age ring ditch (Site 17), approximately 7 m in diameter, close to the western boundary of the Converter Site.

1.4.36 In relation to potential Iron Age activity, an assessment of former field boundaries suggests the presence of an elliptical Iron Age enclosure (Site 18) within the Converter Site. The geophysical survey for the proposed Atlantic Array project also identified anomalies consistent with a 10 m square enclosure (Site 19) which could be Iron Age, or potentially Roman, in date. The enclosure is located approximately 350 m to the south of the eastern part of the Onshore HVDC Cable Corridor, close to Lower Kingdon.

1.4.37 Fieldwalking undertaken in 1983 (Site 20) within the western part of the Onshore HVDC Cable Corridor and to the north of Abbotsham Court found approximately two hundred worked flint artefacts dated to the Prehistoric period in general. The artefacts primarily comprised flint knapping waste, although ten scrapers and six rough chisels were identified.

1.4.38 Multiple cropmarks have been recorded within the study area during the second half of the 20th century; the HER records three of these cropmark sites as being possible Prehistoric enclosures. The enclosure near Abbotsham Court (Site 21) is located within the western part of the Onshore HVDC Cable Corridor, while the remaining two enclosures (Sites 22 and 23) are located close together near Knotty Corner, within 100 m of the Onshore HVDC Cable Corridor and just south of the A39 road.

1.4.39 Due to a lack of intrusive investigation or the presence of substantive dating evidence, numerous features recorded on the HER identified by means of aerial survey, geophysical survey or, more rarely, intrusive archaeological fieldwork, have been broadly dated to the Prehistoric and Roman period in general. Such features comprise: an irregular subcircular enclosure (Site 24) located approximately 400 m to the south of the Onshore HVDC Cable Corridor at Abbotsham Court; a second subcircular enclosure and possible field system

(Site 25) partially extending into the central section of the Onshore HVDC Cable Corridor near Hallsannery House; possible field system ditches (Site 26) found nearby during archaeological trenching for the proposed Atlantic Array project (Oxford Archaeology 2012); a double ditched cropmark enclosure (Site 27**)** to the north of the central section of the Onshore HVDC Cable Corridor just east of the crossing of the River Torridge; further field system ditches (Site 28) found during archaeological trenching within the Onshore HVDC Cable Corridor to the west of Woodville Farm (Oxford Archaeology, 2012); an oval enclosure (Site 29) measuring approximately 50 m by 35 m located within the Converter Site; and multiple geophysical survey anomalies (Site 30), indicative of a field system, extending into the eastern edge of the Converter Site.

1.4.40 Further geophysical survey anomalies extending into the Onshore HVDC Cable Corridor to the south of the Converter Site have been interpreted as a possible field system (Site 31) which could date to either the Prehistoric, Roman, or Medieval periods. Cropmarks associated with a rectilinear enclosure and possible settlement activity (Site 32) located within the Onshore HVDC Cable Corridor just to the west of the crossing of the River Torridge have also been broadly dated to the same periods.

1.4.41 The foundations of a possible Roman tower, or a potentially a Post-medieval windmill (Site 33), are recorded approximately 20 m to the east of the Onshore HVDC Cable Corridor, and east of the crossing of the A39 road.

1.4.42 Recent archaeological excavations at Clovelly Road, Bideford approximately 350 m east of the Onshore HVDC Cable Corridor have recorded the presence of an Iron Age roundhouse approximately 11 m in diameter, as well as a Roman enclosure dating to the 2nd century AD. The Roman enclosure covers an area of roughly 40 m by 40 m, with the enclosing sub-square enclosure ditch measuring approximately 3 m wide by 2.2 m deep. (Southwest Archaeology n.d.). The 2nd century AD enclosure is of a similar scale and form as that identified during the trial trenching within the Proposed Development to the north of Winscott Barton (see paragraph **1.4.84**).

Early Medieval and Medieval (*c.* AD 410 - 1485)

1.4.43 A review of the information contained within the Domesday survey of AD 1086 (Open Domesday online) indicates there to be six entries within the vicinity of the Proposed Development. The largest of these settlements is Bideford, recorded as containing 52 households. Abbotsham, located immediately adjacent to the Onshore HVDC Cable Corridor was recorded as containing 31 households. The remaining four settlements of Landcross, Webbery, Little Weare and Huxhill contained seven or less households and can be considered to have been small hamlets during the latter part of the 11th century.

1.4.44 This period would have seen the general development of the network of parishes that still exists today, each one with its own church. Settlement would mainly have been in the form of small hamlets and isolated farms, as shown in the Domesday survey. No sites or material of definite Early Medieval date (AD 410 - 1066) are recorded within the 500 m historic environment study area.

1.4.45 The modern settlement of Abbotsham, located approximately 100 m to the east of the Onshore HVDC Cable Corridor, was called '*Hama*' in the Domesday survey (Site 34). It was one of the foundation estates of Tavistock Abbey in the 13th century, taking its current name from the fact that it belonged to the abbots of Tavistock.

1.4.46 Several other Medieval settlements are recorded on the HER within the 500 m historic environment study area. The settlement of Winscott (Site 35) is located approximately 300 m south of the Onshore HVDC Cable Corridor, the settlement of Webbery (Site 36) is located approximately 100 m north of the Converter Site, and the hamlet of Shamland (Site 37) is located approximately 100 m west of the Onshore HVDC Cable Corridor and to the north west of Abbotsham.

1.4.47 Five Medieval farms or farmsteads are recorded on the HER within the 500 m historic environment study area. Two of these farmsteads are recorded as located between 250 m and 300 m to the east of the Onshore HVDC Cable Corridor at Abbotsham (Sites 38 and 39); one approximately 400 m to the north of the Onshore HVDC Cable Corridor (Cornborough Farmstead, Site 42); and two at least 300 m from the Converter Site (Higher Kingdon, Site 4**0** and Lower Kingdon, Site 41).

1.4.48 Landscape analysis using the historical sequence of OS maps has identified several possible Medieval enclosures based on former field boundary patterns; all are of extensive size. One of these (Site 43) is located immediately adjacent to the Onshore HVDC Cable Corridor near Lower Kingdon, another (Site 44) is located to the south of Abbotsham and east of the Onshore HVDC Cable Corridor, with the third (Site 45) located to the west of Littleham and south of the Onshore HVDC Cable Corridor. A fourth enclosure identified in the same manner (Site 46) includes a section of the Onshore HVDC Cable Corridor on the western side of the River Torridge crossing. Geophysical survey has identified a possible smaller Medieval enclosure approximately 500 m to the east of the Onshore HVDC Cable Corridor and south west of Bideford (Site 47).

1.4.49 A series of earthworks (Site 48) located approximately 100 m to the north of the Onshore HVDC Cable Corridor at Ashridge may be related to Medieval occupation activity, while evidence for a possible Medieval field system (Site 49) is recorded at Higher Kingdon, approximately 350 m to the west of the Converter Site.

1.4.50 The route of a former road south of Abbotsham Court (Site 50), a short distance south of the Onshore HVDC Cable Corridor, could be Medieval in origin. The route of another former road (Site 64), in use during the Medieval and Post-medieval periods, is located close by.

1.4.51 There are numerous records from within the western part of the 500 m historic environment study area of field boundaries that are potentially Medieval in date (Sites 51 – 62). Only the field boundaries associated with Sites **5**1, 54, 55 and 60 are mapped as extending into the Onshore HVDC Cable Corridor.

1.4.52 To the west of Woodville Farm and directly adjacent to the Onshore HVDC Cable Corridor is the location of a possible Medieval settlement known as Bryberry (Site 63**)** that was deserted by the late 19th century.

1.4.53 A group of small rectilinear enclosures recorded approximately 100 m to the east of the Onshore HVDC Cable Corridor and south west of Bideford (Site 65) may have been utilised for domestic or industrial purposes during the Medieval or Post-Medieval periods.

1.4.54 Multiple Medieval or Post-medieval field system or boundaries are recorded within the study area (Sites 66 – 69). Site 66 falls within the Converter Site, while Site 69 is crossed by a proposed access road.

Post-medieval and Modern (AD 1486 to present)

1.4.55 Archaeological excavations at Cornborough (Site 70), immediately to the north of the western Onshore HVDC Cable Corridor, identified that the Post-medieval settlement at this location was more extensive than the small number of contemporary buildings would imply.

1.4.56 Sites relating to the Post-medieval period recorded on the HER and within the 500 m historic environment study area include several large detached houses (Sites 71-73), farmsteads (Sites 74-82); existing buildings or the former locations of such buildings (Sites 82-101) including two chapels, two smithies, and a brewhouse; mills (Sites 102-105); a coastal watch tower (Site 106); wells (Sites 107-110); a tomb (Site 111); a pound (Site 112); undefined structures or buildings (Sites 113-120); limekilns (Sites 121-124); pottery findspot (Site 125); quarries (Sites 126-149); milestones/mileposts (Sites 150-153); boundary stones (Sites 154-156); a midden (Site 157); roads and trackways (Sites 157-164); railways (Sites 165-167); boundaries (Sites 168-176); ridge and furrow earthworks (Sites 177 and 178); and various linear earthworks (Sites 179 – 181). App's Brewery to the east of Littleham (Site 182) is likely to have been in use during the Post-medieval and Modern periods, whilst archaeological excavations at Abbotsham Cross found a wall and pit dating to one of these periods (Site 183).

1.4.57 Features dating to the Modern period on the HER are represented by the former Shebberton Racecourse (Site 184); Abbotsham Rifle Range (Site 185); Abbotsham War Memorial (Site 186); and a quarry at Cornborough Cliff (Site 187).

1.4.58 A number of these Post-medieval and Modern sites lie within the Onshore Infrastructure Area, including a windmill (Site 102), a coastal swimming pool (Site 120), a limekiln (Site 123), a quarry (Site 131), a milestone (Site 152), the course of a turnpike road and footpath (Sites 158 and 164), railways (Sites 165 – 167), multiple boundaries and linear earthworks (Sites 170, 171, 179, and 181), excavated wall and pit features (Site 183), the former Shebberton Racecourse (Site 184) and the former Abbotsham Rifle Range (Site **185**).

1.4.59 A review of the Tithe mapping for the region (**Figure 5)** confirms that the area within the Order Limits would have been very much rural and agricultural in character in the mid-19th century. Several structures depicted on the Tithe mapping appear to lie within, or immediately adjacent to, the Onshore HVDC Cable Corridor. The more significant of these features is the farmstead of Higher Dunn, located within the Onshore HVDC Cable Corridor to the north of Littleham. This is depicted as comprising three structures, two of which frame a courtyard, with an orchard bounding it to the north. No consistent anomalies were detected in relationship to the Higher Dunn farmstead during the geophysical survey undertaken for the Proposed Development.

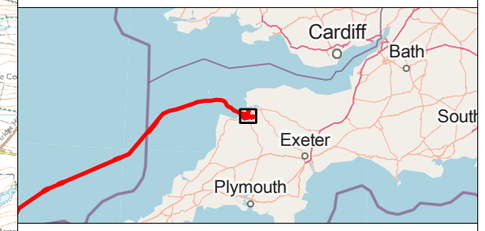
1.4.60 A small individual structure is shown as just within the Onshore HVDC Cable Corridor, west of Bowood and just north of the A39 road crossing. Geophysical anomalies identified in 2022 are consistent with the presence of below-ground remains associated with this individual structure (see below). No other features of interest within the Order Limits are shown on the Tithe mapping.

1.4.61 The farm complex shown a short distance to the west of Woodville Farm (**Figure 5c**) is also of note.

Notes
1. This plan is scaled at paper size A3. If received electronically it is the recipients responsibility to print to the correct scale. Only written dimensions should be used.

Legend

- Order Limits
- Converter Site
- Map Frames



Rev	Description	By	CB	Date
P01	FINAL	SHB	MB	18.11.24

Client: Xlinks 1 Limited

Project: Xlinks' Morocco-UK Power Project

Title: Tithe Mapping Index Page

Status: FINAL

Scale @ A3: 1:40,000

Date Created: Nov 2024

Figure Number: **5**

Rev: **P01**

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- Order Limits
- Construction Compound
- Features of Interest

P01	FINAL	MP	MB	14.11.24
Rev	Description	By	CB	Date

Client: Xlinks 1 Limited

Project: Xlinks' Morocco-UK Power Project

Title: Tithe Mapping (sheet 1)

Status	Scale @ A3	Date Created
FINAL	1:10,000	Nov 2024

Figure Number: **5a**

Rev: **P01**

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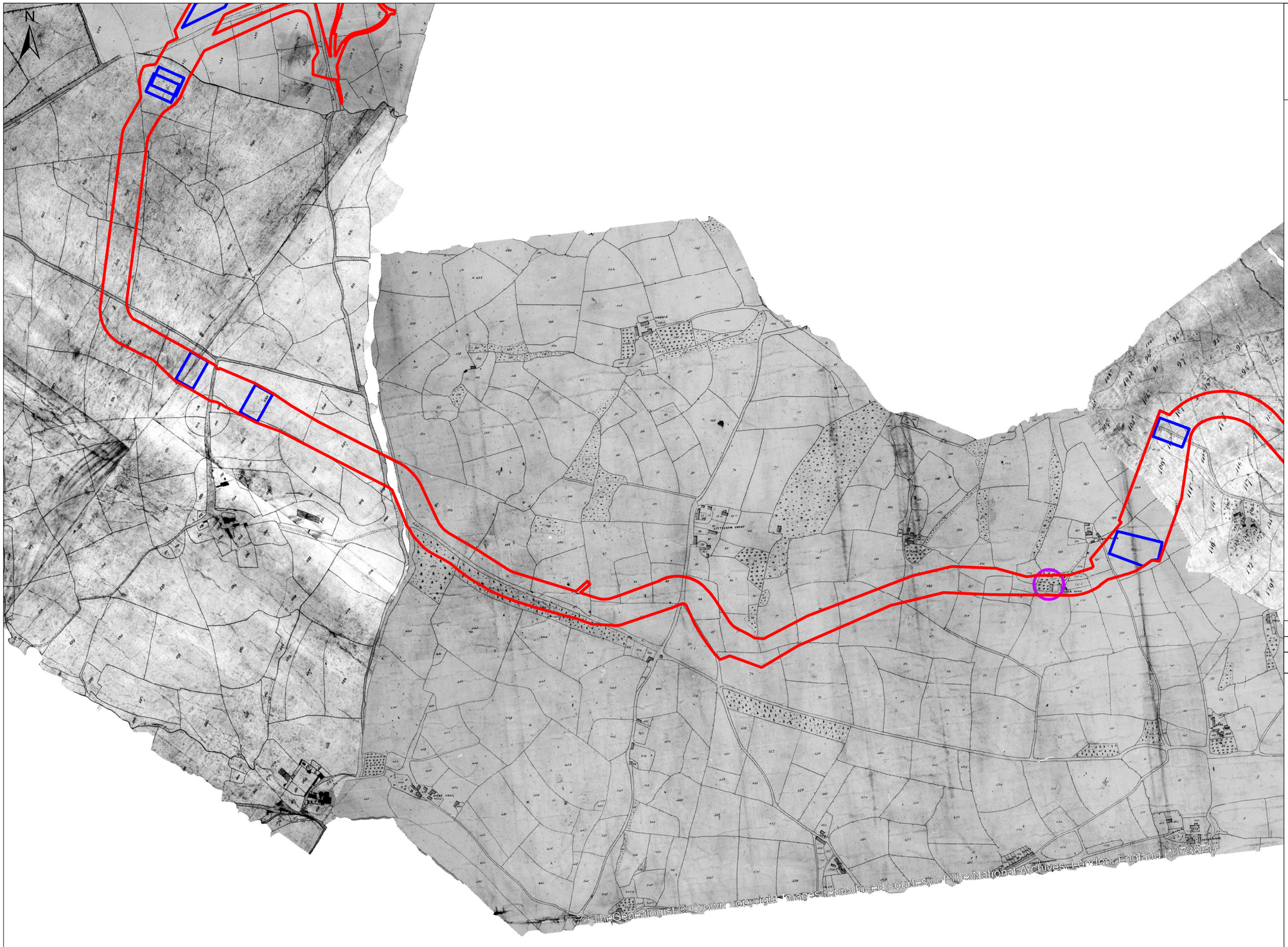

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- Order Limits
- Construction Compound
- Features of Interest

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Client: Xlinks 1 Limited

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Title: Tithe Mapping (sheet 2)

Status	Scale @ A3	Date Created
FINAL	1:10,000	Nov 2024

Figure Number: **5b**

Rev: **P01**

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- Order Limits
- Construction Compound
- Features of Interest

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P01	FINAL	MP	MB	14.11.24

Client: Xlinks 1 Limited

Project: Xlinks' Morocco-UK Power Project

Title: Tithe Mapping (sheet 3)

Status	Scale @ A3	Date Created
FINAL	1:10,000	Nov 2024

Figure Number: **5c**

Rev: **P01**

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- Order Limits
- Converter Site
- Construction Compound

Rev	Description	By	CB	Date
P01	FINAL	MP	MB	14.11.24

Client: Xlinks 1 Limited

Project: Xlinks' Morocco-UK Power Project

Title: Tithe Mapping (sheet 4)

Status	Scale @ A3	Date Created
FINAL	1:10,000	Nov 2024

Figure Number	Rev
5d	**P01**

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1.4.62 In general, a review of the 1st edition OS 6'' (to the mile) mapping (**Figure 6)** indicates that by the late 19th century the land within the Order Limits remained rural and agricultural in character, similar to that depicted on the earlier Tithe mapping (see above). Of the features of interest highlighted on the Tithe mapping, the farmstead at Higher Dunn is depicted on the 1st edition OS mapping but comprises just a single building, while the small individual structure is marked within the western part of the Onshore HVDC Cable Corridor near Bowood is no longer present. The Abbotsham Cliff limekiln (Site **123**) is marked on the 1st edition OS map in immediate proximity to the Landfall (**Figure 6a**), while a quarry is marked within the Onshore HVDC Cable Corridor to the south of Ashridge (**Figure 6c**). No other features of interest are marked on the 1st edition OS mapping within the Onshore Infrastructure Area. The farm complex to the west of Woodville Farm is no longer marked.

1.4.63 During the 20th century, the major changes within the immediate landscape have been associated with the expansion of the settlements at Bideford and Abbotsham, the upgrading of existing roads into the A39 and A386, along with construction of new infrastructure such as the Cornborough Sewage Treatment Works, the National Grid Electricity Transmission Alverdiscott substation and a solar farm at Lower Kingdon. A larger solar farm is currently under construction partially within the Converter Site.

Undated

1.4.64 A review of the HER indicates that multiple records located within the 500 m historic environment study area relate to undated features. These features have been identified by means of aerial photographic interpretation (Sites 188, 194, 196 and 197), geophysical survey (Sites 189 - 193, 195, 198 - 201 and 204), intrusive archaeological investigation (Site **202**), or field observations (Site 203). Of these, Sites 189, 201, 202, and 203 are located within the Order Limits, all of which are related to discrete linear features such as banks or ditches. Linear features associated with Site 189 were confirmed during the geophysical survey undertaken for the Proposed Development (see below).

Locally listed buildings

1.4.65 Torridge District Council maintains a list of buildings considered to be of local heritage interest. There are no buildings on this list that are also within the 500 m historic environment study area.

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a

b

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d

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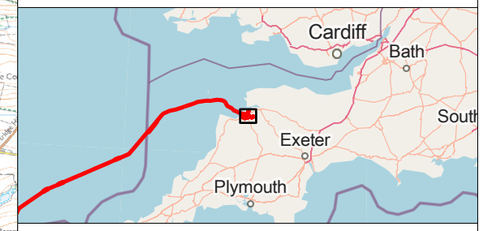
- Order Limits
- Converter Site
- Map Frames



Rev	Description	By	CB	Date
P01	FINAL	SHB	MB	18.11.24

Xlinks

Client: Xlinks 1 Limited

Project: Xlinks' Morocco-UK Power Project

Title: 1st Edition Ordnance Survey Mapping Index Page

Status: FINAL

Scale @ A3: 1:40,000

Date Created: Nov 2024

Figure Number: **6**

Rev: **P01**

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- Order Limits
- Construction Compound

P01	FINAL	MP	MB	14.11.24
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Client: Xlinks 1 Limited

Project: Xlinks' Morocco-UK Power Project

Title: 1st Edition Ordnance Survey Mapping (sheet 1)

Status: FINAL

Scale @ A3: 1:10,000

Date Created: Nov 2024

Figure Number: **6a**

Rev: **P01**

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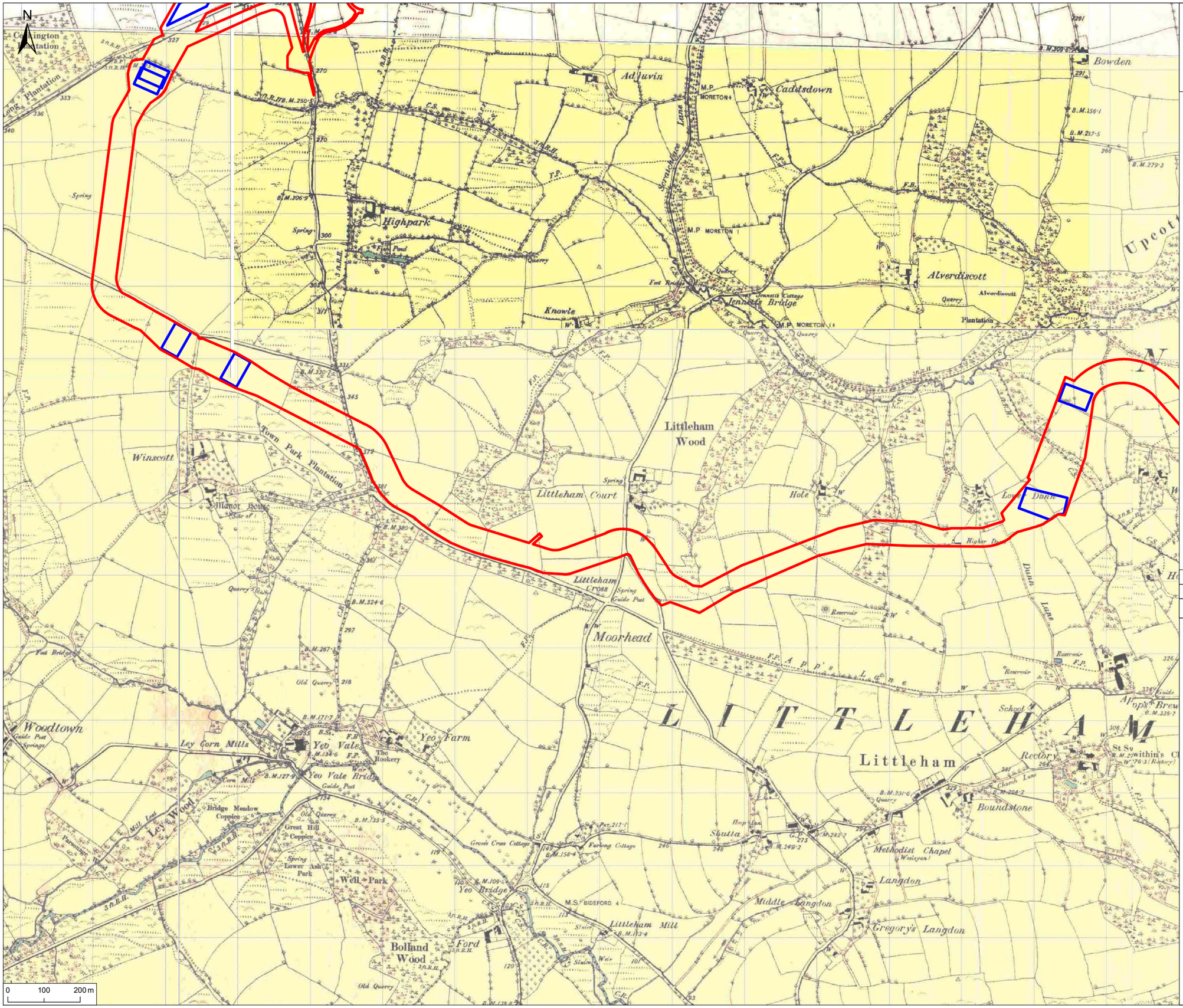

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Client: Xlinks 1 Limited

Project: Xlinks' Morocco-UK Power Project

Title: 1st Edition Ordnance Survey Mapping (sheet 2)

Status	Scale @ A3	Date Created
FINAL	1:10,000	Nov 2024

Figure Number: **6b**

Rev: **P01**

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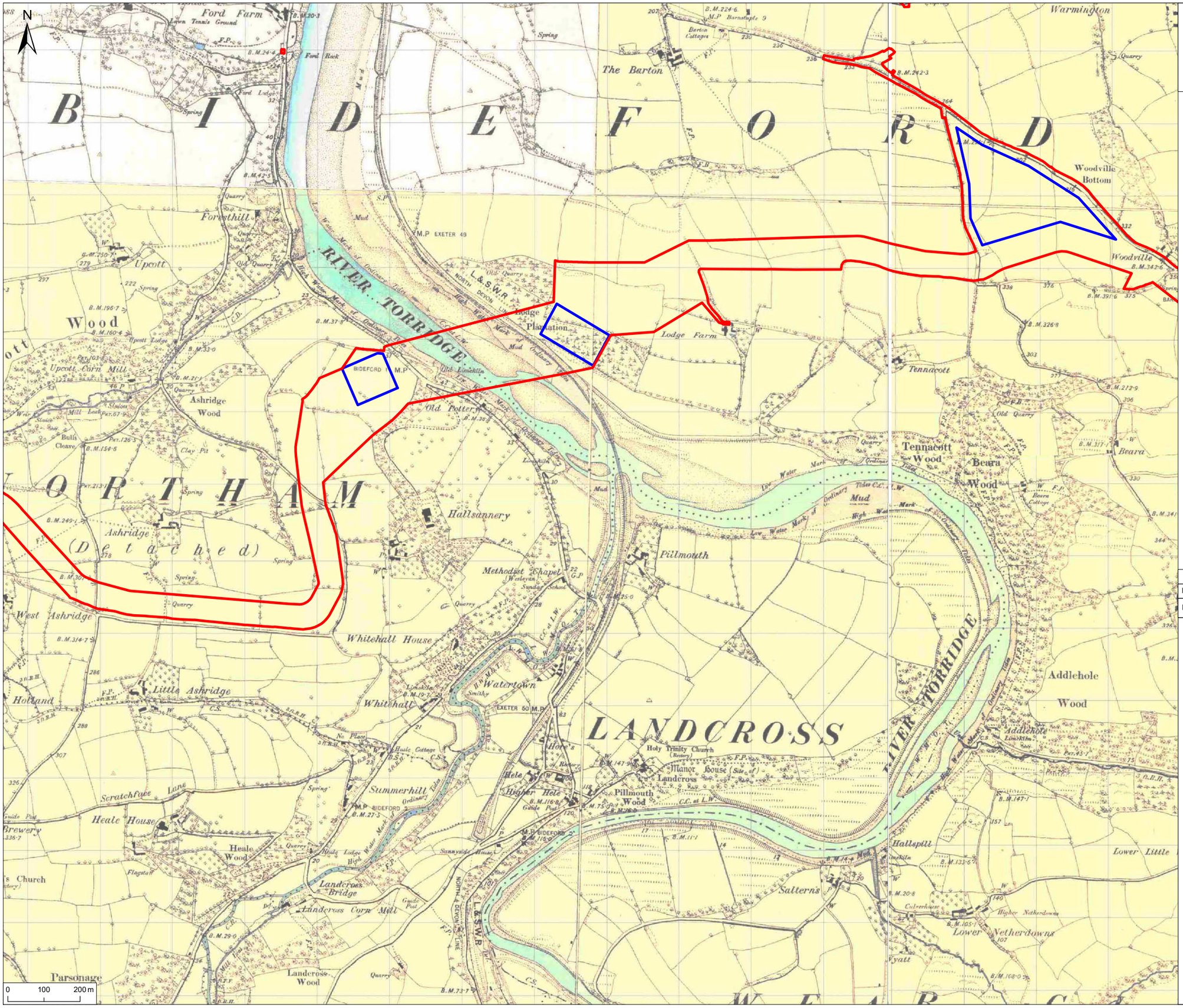

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- Order Limits
- Construction Compound

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Status	Scale @ A3	Date Created
FINAL	1:10,000	Nov 2024

Figure Number: **6c**

Rev: **P01**

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