CHELFHAM MILL SCHOOL
BRATTON FLEMING
NORTH DEVON
DEVON

Statement of Significance and Heritage Impact Assessment

South West Archaeology Ltd. report no.190910

ARCHAEOLOGICAL SERVICES & HISTORIC BUILDING RECORDING
SOUTHWEST ARCHAEOLOGY

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Chelfham Mill School, Bratton Fleming, North Devon, Devon
Statement of Significance and Heritage Impact Assessment

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Report Version: FINAL
Draft issued: 11th September 2019
Finalised by S. Walls: 21st November 2019

Work undertaken by SWARCH for Woodward Smith Architects (the Agent)
on behalf of a Private Client

SUMMARY

This report presents the results of a heritage impact assessment carried out by South West Archaeology Ltd. (SWARCH) for the proposed construction of a housing development at Chelfham Mill School, Bratton Fleming, Devon.

The Chelfham Mill site straddles the boundary between the parishes of Goodleigh and Bratton Fleming; the original mill site was located on the southern (Goodleigh) side of this boundary, but there appears to be little readily available information for the site. There is one possible reference to a fulling mill in 1458, but the fact it appears on the tithe map as Grubbs House rather than Grubbs Mill would imply it was reconstituted as a mill in the later 19th century. When the mill ceased to operate is also unknown. The house served as a guesthouse run by Mrs Little and Mrs Ogden in the 1960s but became an independent boarding school for boys with emotional and behavioural issues in 1967. The school closed in 2015 following allegations of abuse and a former groundsman was imprisoned in 2018.

*In terms of the standing structures, Block 6 should be repaired and retained, a better understanding of the original function of Block 4a needs to be achieved before it can be considered for demolition, and Block 1a should be recorded before demolition; the other buildings are of no historical merit. Mitigation in the form of building recording with monitoring works is appropriate for Block 1a, Block 4a, Block 6 and Block 7a. The impact of the development on the buried archaeological resource will be **permanent** and **irreversible**, but the presence and/or significance of the archaeology remains to be established, and the impact can be mitigated through design or an appropriate programme of archaeological fieldwork.*

A Grade II Listed railway viaduct on the Lynton to Barnstaple railway line straddles the site, and the site contains an undesignated former mill, late Victorian house and school buildings. The historic mill complex may be of two phases, and the structure might date back as far as the late 1700s; the location of the site, on a stream close to its confluence with the Yeo, would imply a longer history of milling here. The archaeological potential of those area next to the stream is therefore enhanced, with the caveat that later building works are likely to have had a significant impact on archaeological deposits or features. Evidence relating to the construction of the viaduct may also survive around the base of the piers.

*In terms of indirect impacts, the only designated structure where there will be an appreciable effect is the Grade II Listed Chelfham Viaduct. The character of its immediate setting would change considerably (**negative/moderate**), but with a less pronounced impact on the historic landscape (**negative/minor**), no cumulative impact (**neutral**) and a minor aggregate impact (**negligible**).*

November 2019

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ACKNOWLEDGMENTS

THE CLIENT
THE GROUNDSMAN
WOODWARD SMITH ARCHITECTS

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1.0 INTRODUCTION

LOCATION: CHELFHAM MILL SCHOOL
PARISH: BRATTON FLEMING
DISTRICT: NORTH DEVON
COUNTY: DEVON
NGR: SS 60939 35645
SWARCH REF. BFCS19

1.1 PROJECT BACKGROUND

South West Archaeology Ltd. was commissioned by Woodward-Smith Architects (the Agents) to produce a statement of significance and undertake a heritage impact assessment on behalf of a private client, for Chelfham Mill School, Bratton Fleming, Devon, in advance of a planning application. This work was undertaken in line with best practice and CIfA guidelines

1.2 TOPOGRAPHICAL AND GEOLOGICAL BACKGROUND

The proposed site covers an area of c.1.3ha and is located in the base of the valley of the River Yeo at the confluence of that river and an unnamed tributary. The base of the valley is fairly flat, at an altitude of c.45m AOD, but the hills rise steeply on three sides to 180m+ AOD. The site is bisected by the tributary and is divisible into three areas: Area 1 (south of the tributary) contains a later 19th century house and a historic mill and leat. Area 2 (the School) consists of a car park and group of 20th century buildings that cluster below and to the west of the viaduct. Area 3 lies to the east of the viaduct and consists of a single small grass field. The soils of this area are recorded as the well-drained fine loamy and fine silty soils of the Denbigh 1 Association (SEEW 1983), over superficial alluvial deposits of clay, silt sand and gravel with the mudstones of the Pilton Mudstone Formation at depth (BGS 2019).

1.3 HISTORICAL BACKGROUND

The Chelfham Mill site straddles the boundary between the parishes of Goodleigh and Bratton Fleming; the original mill site was located on the southern (Goodleigh) side of the boundary, but there is little information before the 1st edition OS maps. There is one *possible* reference to a fulling mill in 1458], but the fact it appears a *Grubbs House*, rather than *Grubbs Mill*, on the Bratton tithe map would imply it was reconstituted as a mill in the later 19th century. When the mill ceased to operate is also unknown. The house served as a guesthouse run by Mrs Little and Mrs Ogden in the 1960s but became an independent boarding school for boys with emotional and behavioural issues in 1967. The school closed in 2015 following allegations of abuse, and a former groundsman was imprisoned in 2018.

1.4 ARCHAEOLOGICAL BACKGROUND

The site includes the Grade II Listed Chelfham railway viaduct and the undesignated former mill/school buildings. The Devon HER records a boundary stone on the western boundary of the site, where it meets the road. Fords and quarries are recorded beyond the boundary to the north-west, north and south-west, with a mill noted to the south-east. Little, if any, archaeological fieldwork appears to have taken place in the immediate area.

1.5 METHODOLOGY

This work was undertaken in accordance with best practice. The heritage impact assessment follows the guidance outlined in: Conservation Principles: policies and guidance for the sustainable management of the historic environment (English Heritage 2008a), The Setting of Heritage Assets (Historic England 2015, revised 2017), Seeing History in the View (English Heritage 2011), Managing Change in the Historic Environment: Setting (Historic Scotland 2010), and with reference to Guidelines for Landscape and Visual Impact Assessment 3rd Edition (Landscape Institute 2013).

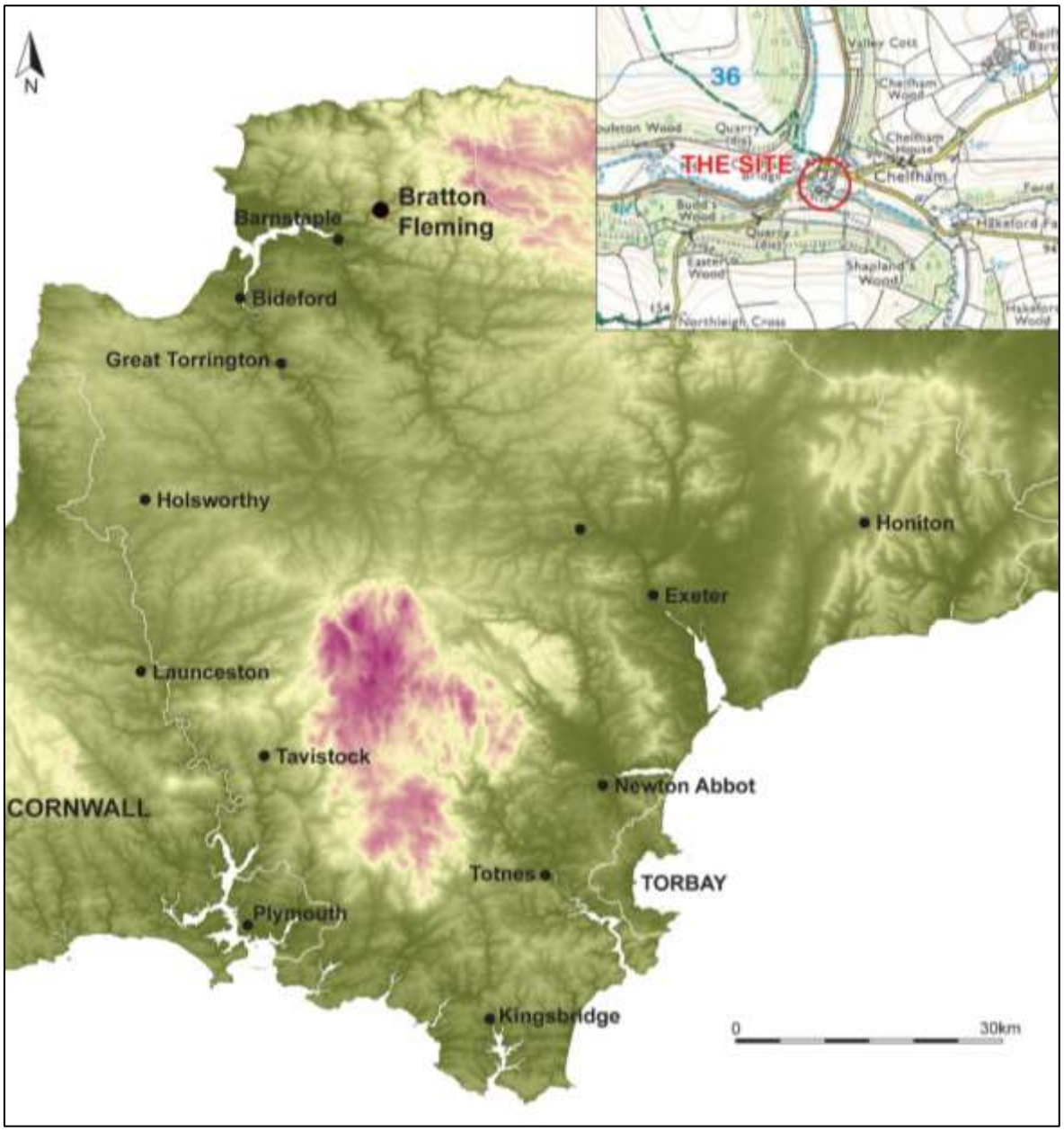

FIGURE 1: SITE LOCATION (THE SITE IS INDICATED).

2.0 HERITAGE IMPACT ASSESSMENT

2.1 HERITAGE IMPACT ASSESSMENT - OVERVIEW

The purpose of heritage impact assessment is twofold: Firstly, to understand – insofar as is reasonably practicable and in proportion to the importance of the asset – the significance of a historic building, complex, area, monument or archaeological site (the 'heritage asset'). Secondly, to assess the likely effect of a proposed development on the heritage asset (direct impact) and/or its setting (indirect impact). This methodology employed in this assessment is based on the approach outlined in the relevant DoT guidance (DMRB vol.11; WEBTAG), used in conjunction with the ICOMOS (2011) guidance and the staged approach advocated in *The Setting of Heritage Assets* (GPA3 Historic England 2015; revised 2017). The methodology employed in this assessment can be found in Appendix 1.

2.2 NATIONAL POLICY

General policy and guidance for the conservation of the historic environment are now contained within the *National Planning Policy Framework* (Department for Communities and Local Government 2019). The relevant guidance is reproduced below:

Paragraph 189
In determining applications, local planning authorities should require the applicant to describe the significance of any heritage assets affected, including the 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. As a minimum the relevant historic environment record should be consulted, and the heritage assets assessed using appropriate expertise where necessary. Where a site on which a development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Paragraph 190
Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

A further key document is the Planning (Listed Buildings and Conservation Areas) Act 1990, in particular section 66(1), which provides *statutory protection* to the setting of Listed buildings:

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.

2.3 LOCAL POLICY

Policy ST15 of the North Devon and Torridge Local Plan 2011-2031 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.

2.4 STRUCTURE OF ASSESSMENT – DIRECT AND INDIRECT IMPACTS

This assessment is broken down into two main sections. Section 3.0 addresses the *direct impact* of the proposed development i.e. the physical effect the development may have on heritage assets within, or immediately adjacent to, the development site. Designated heritage assets on or close to a site are a known quantity, understood and addressed via the *design and access statement* and other planning documents. Robust assessment, however, also requires a clear understanding of the value and significance of the *archaeological* potential of a site. This is achieved via the staged process of archaeological investigation detailed in Section 3.0. Section 4.0 assesses the likely effect of the proposed development on known and quantified designated heritage assets in the local area. In this instance the impact is almost always indirect i.e. the proposed development impinges on the *setting* of the heritage asset in question and does not have a direct physical effect.

3.0 DIRECT IMPACTS

3.1 STRUCTURE OF ASSESSMENT

For the purposes of this assessment, the *direct effect* of a development is taken to be its direct physical effect on the buried archaeological resource. In most instances the effect will be limited to the site itself. However, unlike designated heritage assets (see Section 4.0) the archaeological potential of a site, and the significance of that archaeology, must be quantified by means of a staged programme of archaeological investigation. Sections 3.2-3.5 examines the archaeological background to the site.

3.2 DOCUMENTARY SOURCES

The Chelfham Mill site straddles the boundary between the parishes of Goodleigh and Bratton Fleming; the original mill site (*Grubbs House*, see below) was located on the southern (Goodleigh) side of the boundary, but there is precious little documentary information for the site before it appears on the 1st edition OS maps. There is one *possible* reference to a fulling mill in 1458 [SRO: DD\DP/42/2], but the fact it appears a *Grubbs House*, rather than *Grubbs Mill*, on the Bratton tithe map (below) would imply it was reconstituted as a mill in the later 19th century. When the mill ceased to operate is also unknown. The house served as a guesthouse run by Mrs Little and Mrs Ogden in the 1960s but became an independent boarding school for boys with emotional and behavioural issue in 1967. The school itself closed in 2015 following allegations of abuse, and a former groundsman was imprisoned in 2018 (BBC website).

The viaduct was built in 1896 to carry the Lynton and Barnstaple narrow gauge railway across the valley. Bridge No.22 is 121m long and c.21.3m high, with eight arches of yellow Marland brick carried on brick and masonry piers. The core of the construction is of concrete made from beach sand. The viaduct is reputed to be the largest narrow-gauge structure in England. The railway closed in 1936, and the viaduct might have been taken down but for the fact structures had been built below making demolition more expensive and hazardous. It remained in the ownership of Southern Railway, then British Rail (1948-2013) and finally the Highways Agency. In 2000 it was repaired and restored, and the parapet replaced (this account from the Lynton & Barnstaple Railway website).

3.3 CARTOGRAPHIC SOURCES

The earliest historic maps available to this study are the tithe maps of Goodleigh and Bratton Fleming produced c.1840 (Figures 2 & 3). On the Bratton side of the water and series of small and irregular linear fields are shown, all of which were owned by Sir Arthur Chichester, leased to William Hunt, and belonged to one of the tenements at Chelfham. The two fields along the river are both listed as *Heckaford Meadow*, a reference to the nearby farm *Hakeford*. The Goodleigh tithe map is less clearly depicted and there must be a strong suspicion that detail has been omitted. A fairly large building is shown standing in isolation, which is labelled on the Bratton map *Grubb's House*. With the exception of field no.375 (which was owned by the Chichesters), the fields on the Goodleigh side of the water belonged to Northleigh, owned by Ralph Sanders Esq. and leased to Thomas Woolaway.

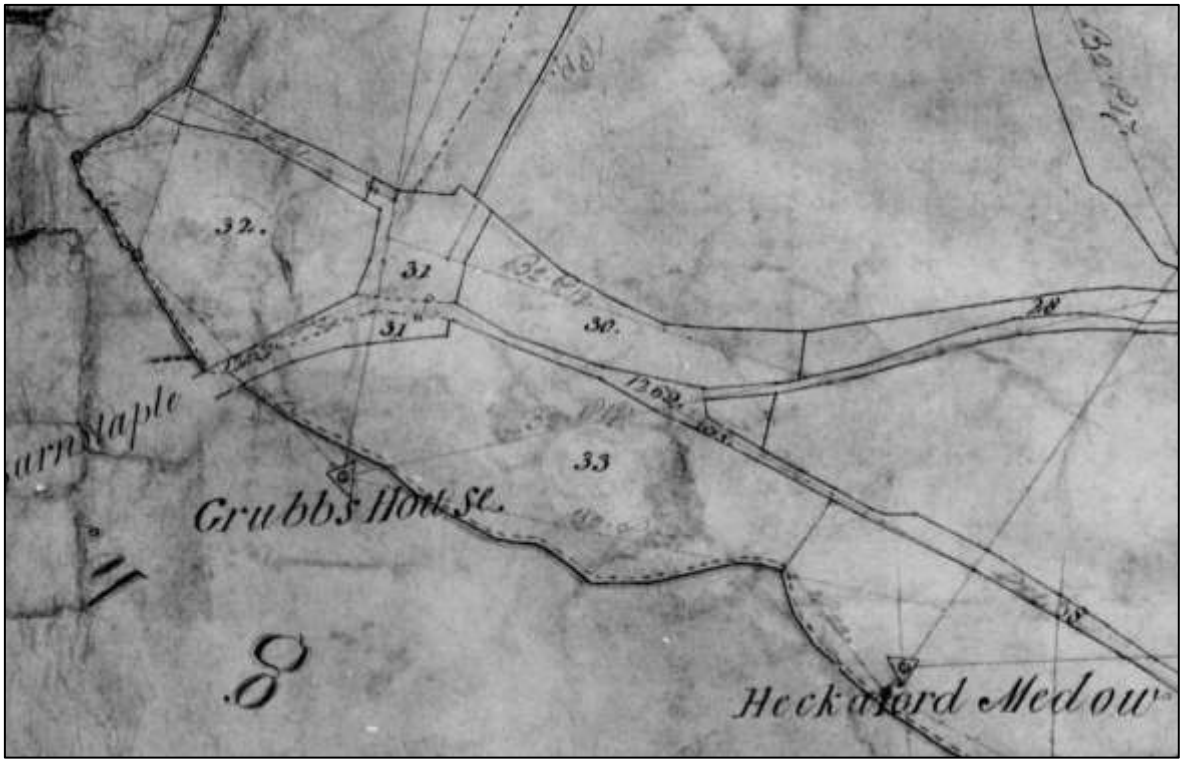

FIGURE 2: EXTRACT FROM THE BRATTON FLEMING TITHE MAP C.1840 (PRO).

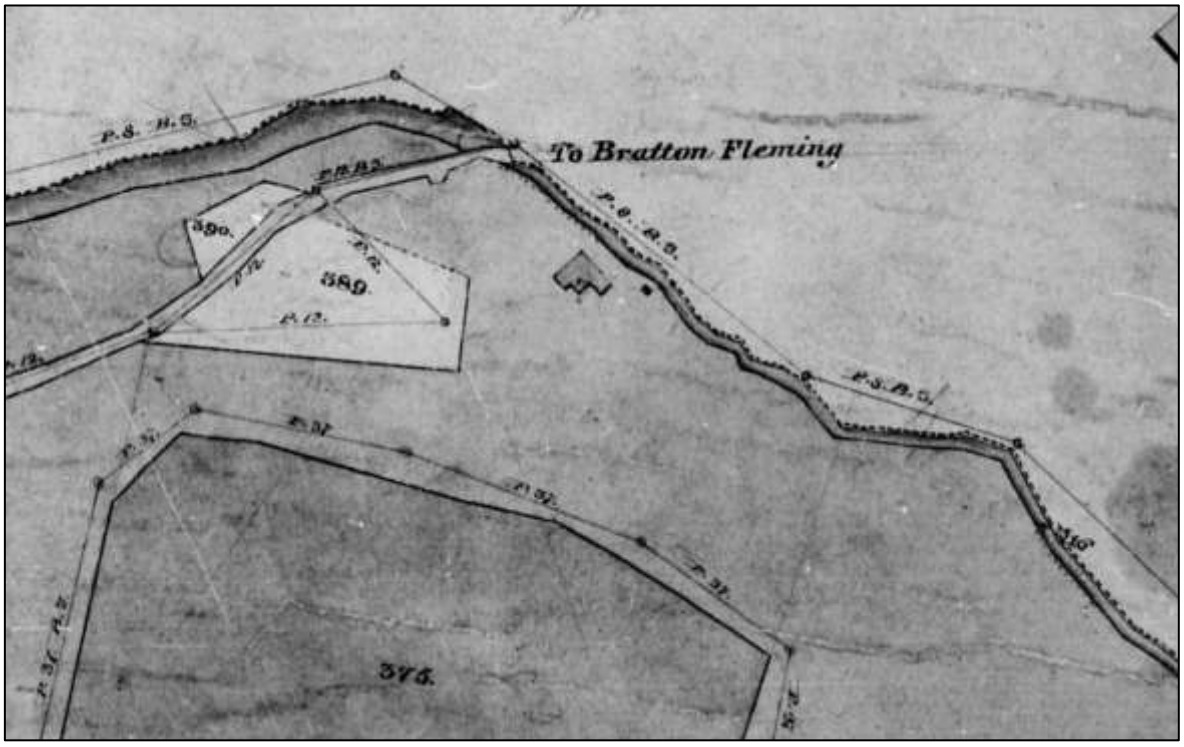

FIGURE 3: EXTRACT FROM THE GOODLEIGH TITHE MAP C.1840 (PRO).

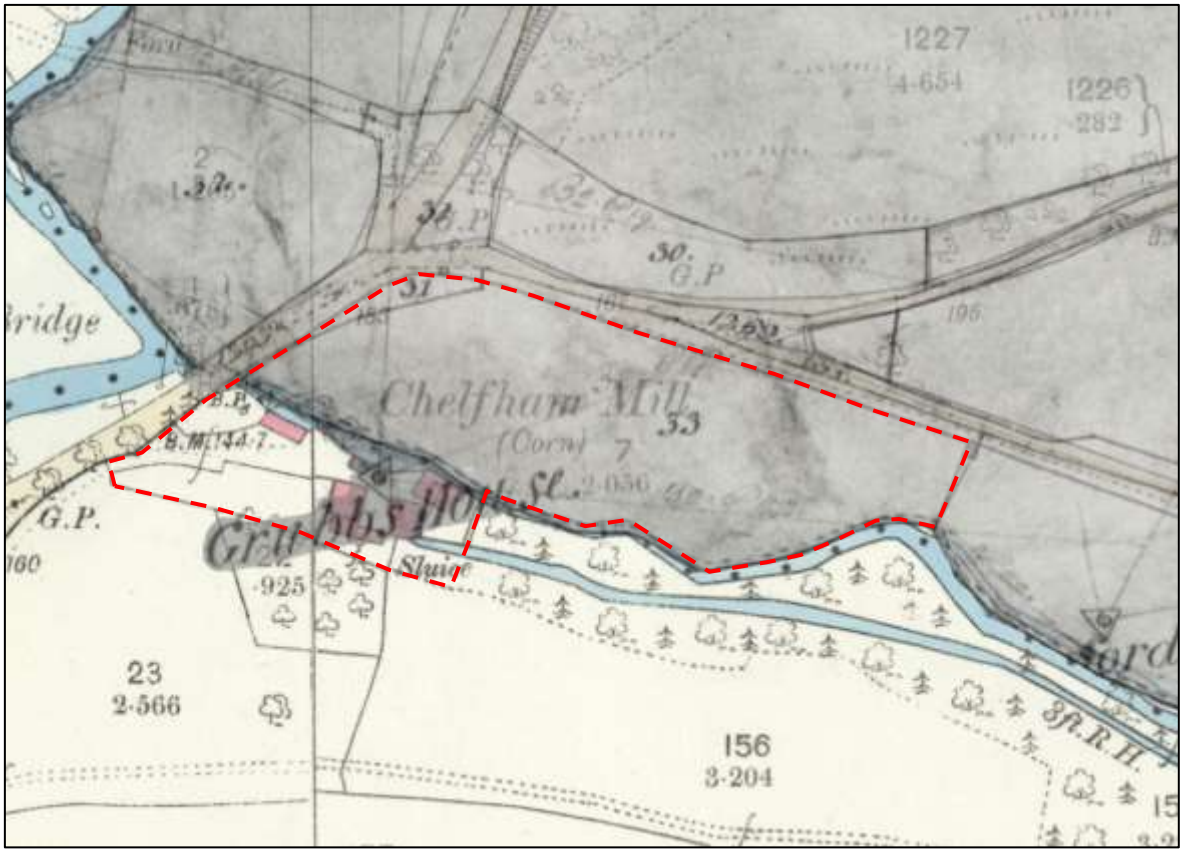

FIGURE 4: COMPARISON OF THE BRATTON FLEMING TITHE MAP WITH THE 1ST EDITION OS MAP.

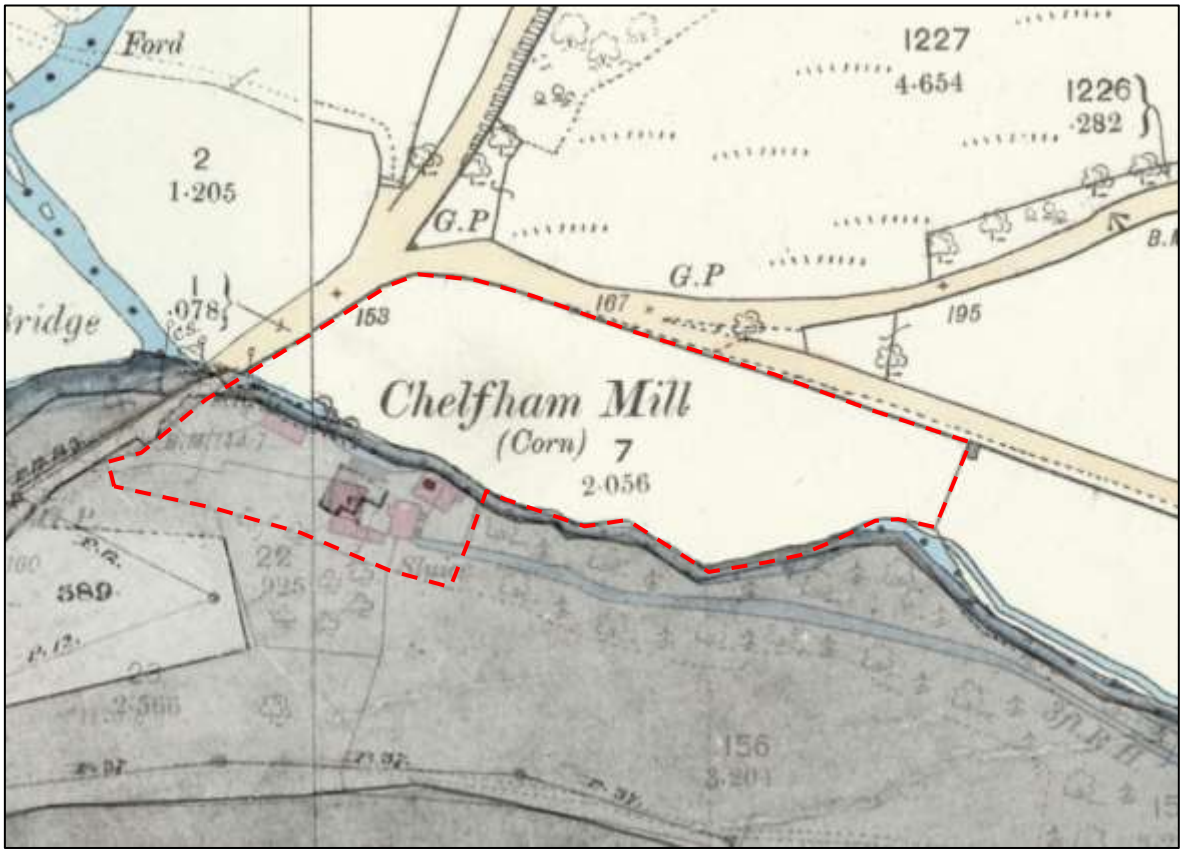

FIGURE 5: COMPARISON OF THE GOODLEIGH TITHE MAP WITH THE 1ST EDITION OS MAP.

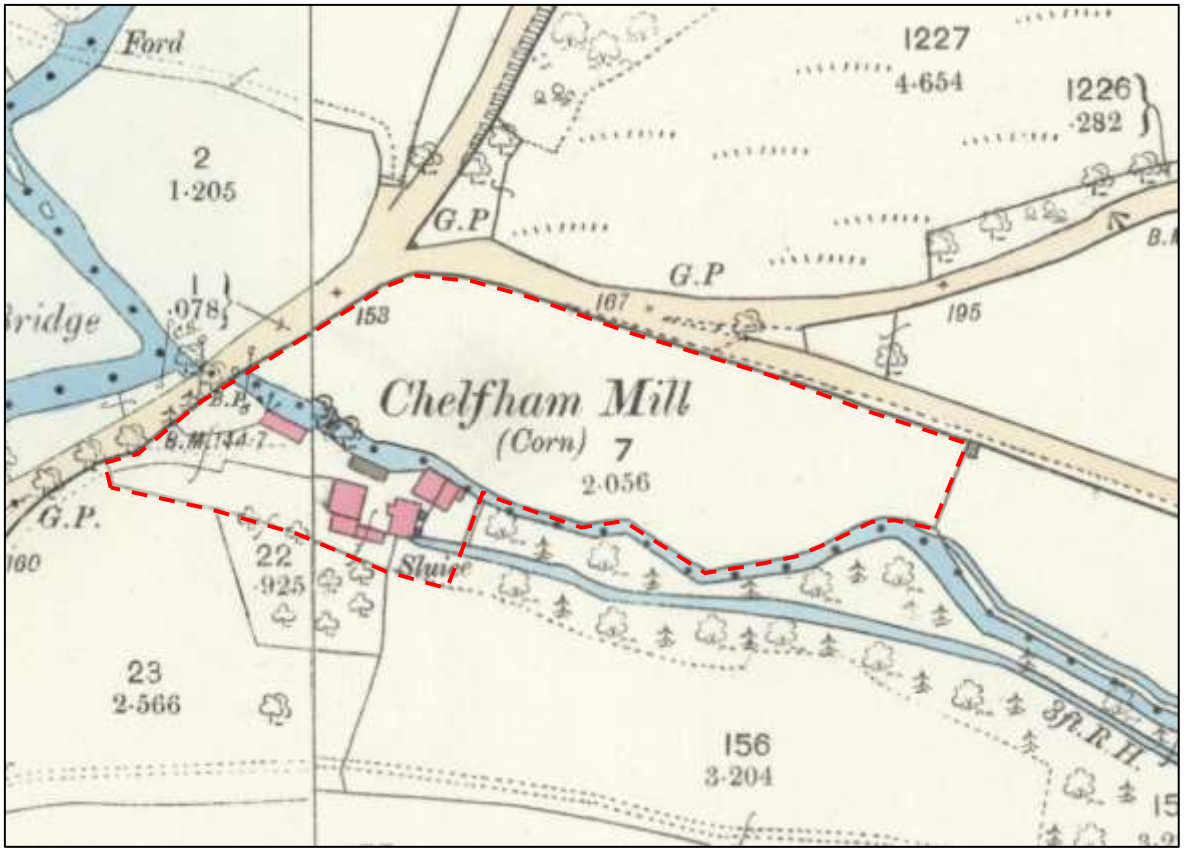

FIGURE 6: 1ST EDITION OS 25" MAP OF 1889 (SURVEYED 1886) (DEVON SHEETS IX.13 & 16); THE SITE IS INDICATED.

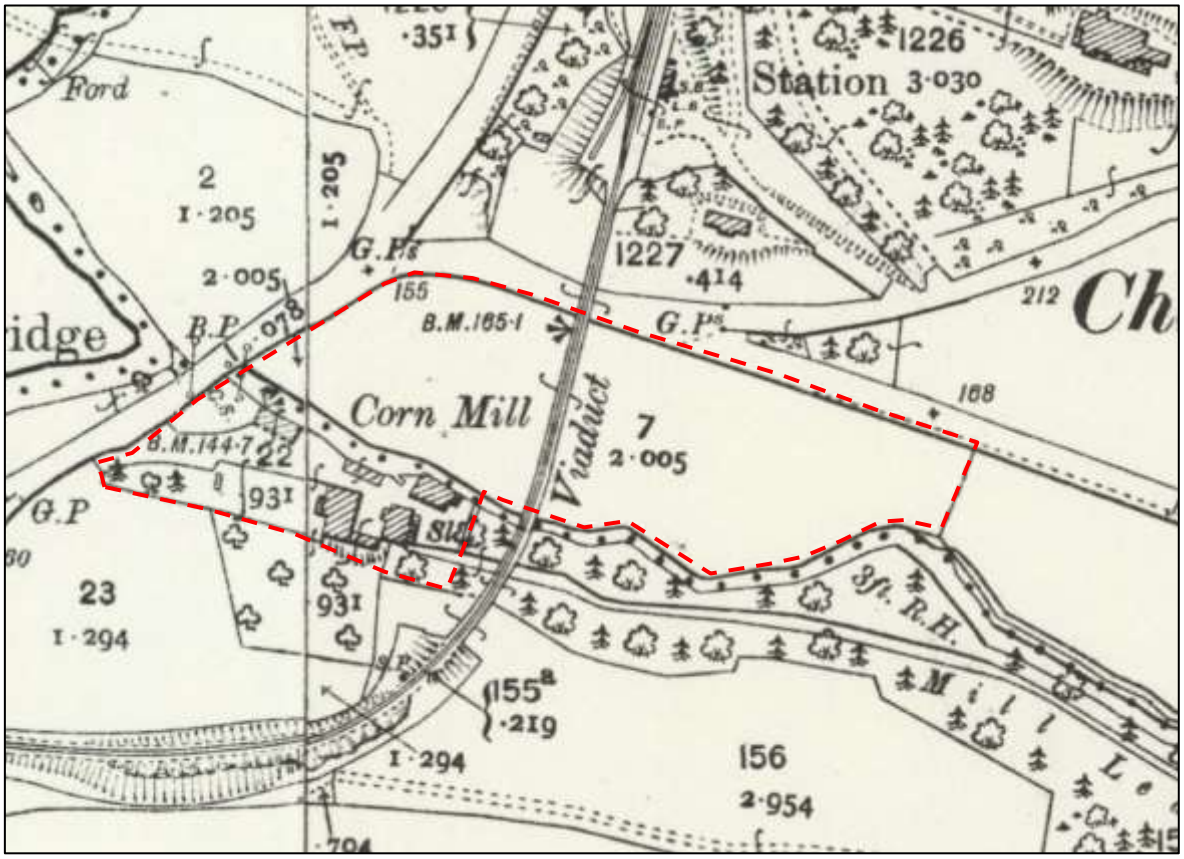

FIGURE 7: 2ND EDITION OS 25" MAP OF 1904 (SURVEYED 1903) (DEVON SHEETS IX.13 & 16); THE SITE IS INDICATED.

The subsequent 1st edition Ordnance Survey (OS) maps show the landscape on the Bratton side of the water as largely unchanged but depicts a host of buildings on the Goodleigh side, together with the infrastructure (leat, sluices etc.) to support a mill. The buildings shown appear to bear little resemblance to the structure shown on the Goodleigh tithe map but given how schematic that map appears to be it is difficult to give this fact any great weight. The 2nd edition OS map is very similar, save for shows the line of the Barnstaple to Lynton railway, constructed 1895-1898 and operating until closure in 1935.

Subsequent OS maps (not illustrated) show the development of the site over the course of the 20th century. The 1:2,500 scale map produced in 1956×57 is identical to that of 1904. The 1963×64 1:10,000 scale map is low on detail but appears to show the mill complex as a single L-shaped building. The 1976 1:2,500 scale map shows the earlier buildings (Blocks 1, 4 and 7) together with the new school buildings (Blocks 2, 3 and 8), as well as roads, car parks and (probably) a tennis court to the west of the complex.

3.4 HER DATA

The site has not been subject to previous archaeological works. There are three entries on the HER relevant to this site: MDV19700 (Chelfham Mill); MDV1966 (Chelfham Viaduct); and MDV32355 (boundary stone).

3.5 HISTORIC IMAGES

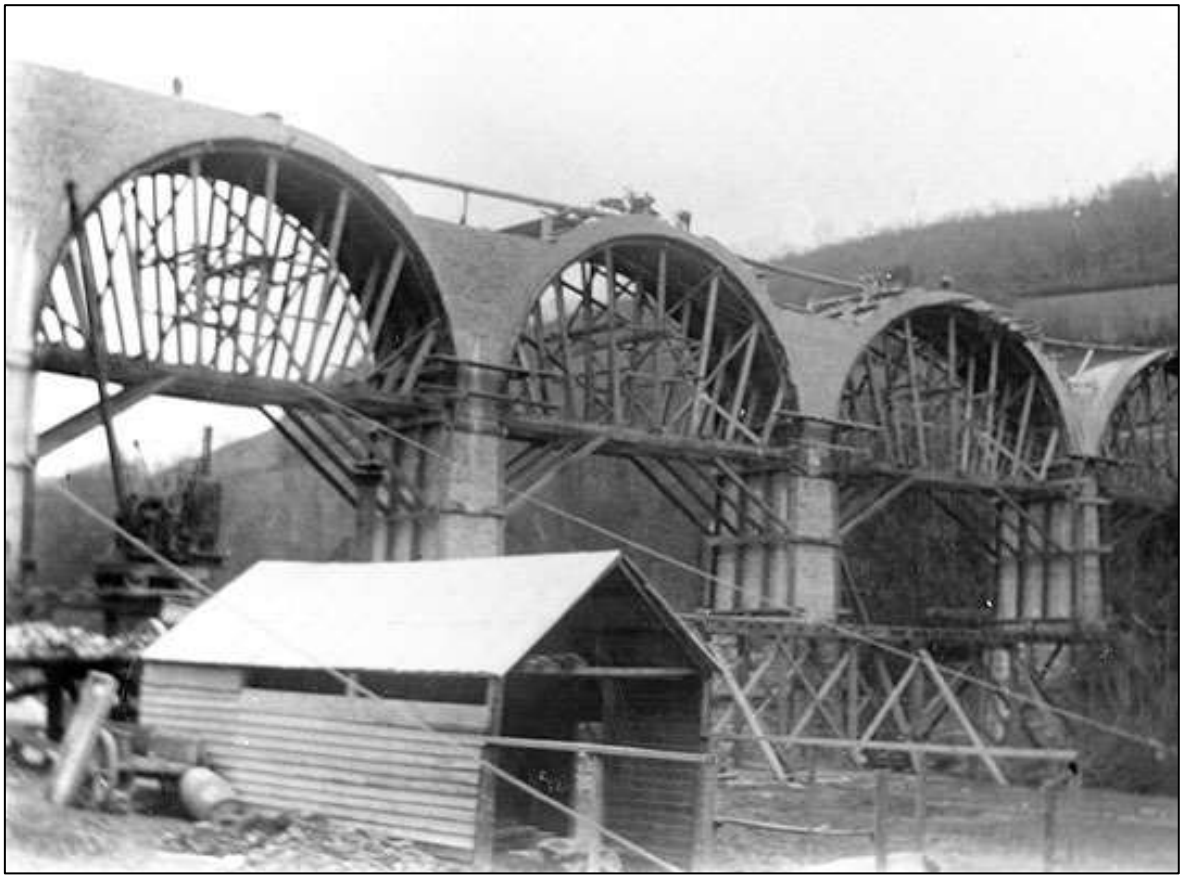

FIGURE 8: PHOTOGRAPH OF THE VIADUCT UNDER CONSTRUCTION IN 1896; VIEWED FROM THE NORTH-WEST (©LYNTON & BARNSTAPLE RAILWAY WEBSITE).

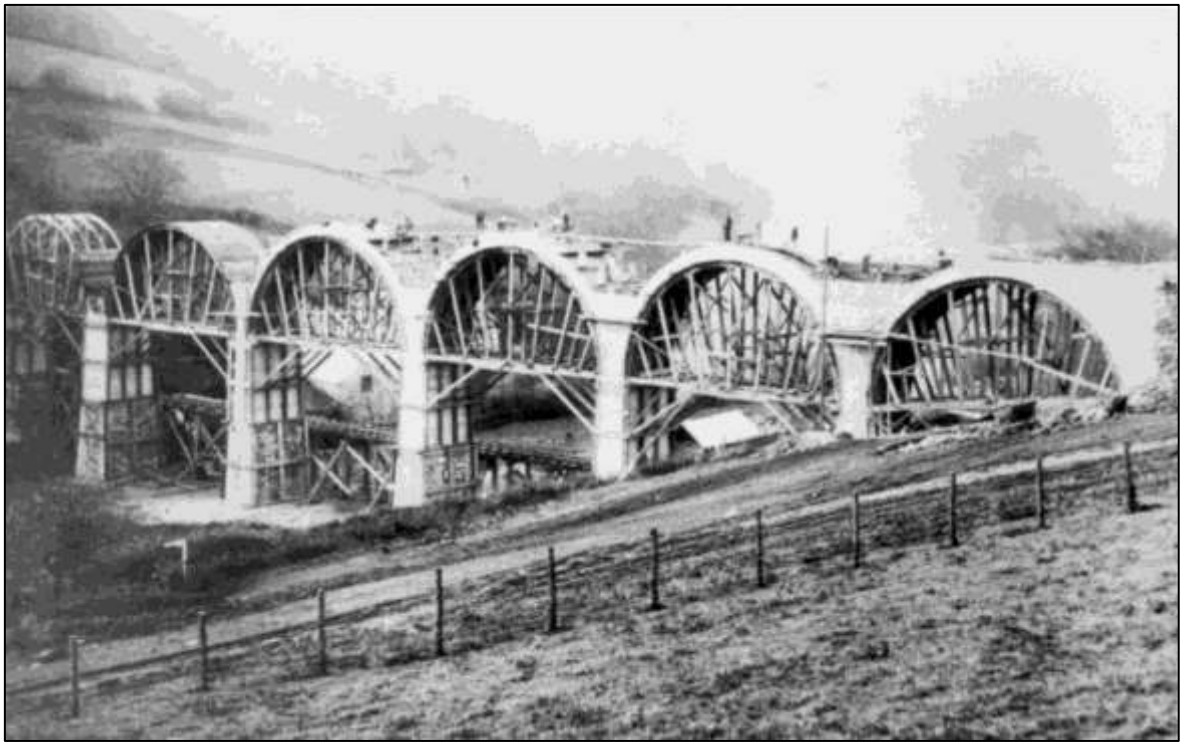

FIGURE 9: PHOTOGRAPH OF THE VIADUCT UNDER CONSTRUCTION IN 1896; VIEWED FROM THE NORTH-EAST (FROM LUCKHURST 2016).

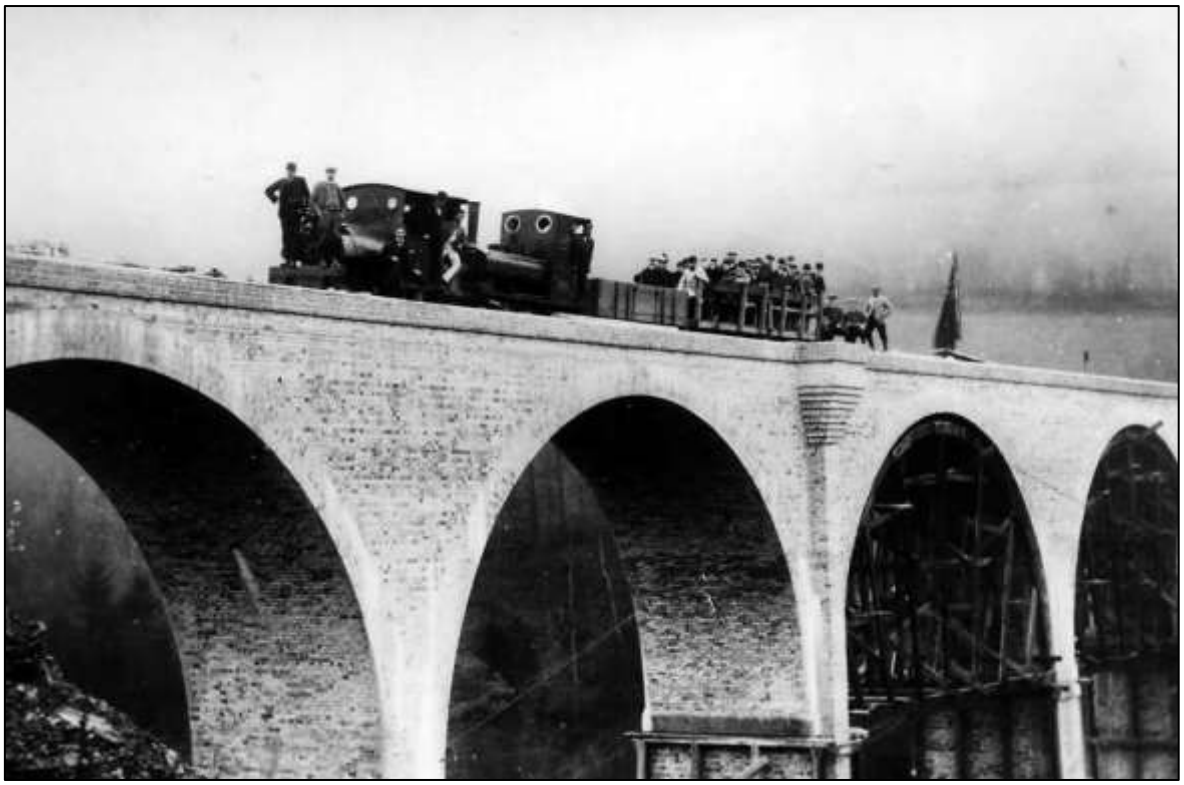

FIGURE 10: PHOTOGRAPH OF THE VIADUCT UNDER CONSTRUCTION IN 1896; VIEWED FROM THE NORTH-WEST (©LYNTON & BARNSTAPLE RAILWAY WEBSITE).

FIGURE 11: PHOTOGRAPH OF THE VIADUCT SHORTLY AFTER COMPLETION; VIEWED FROM THE NORTH-EAST (©LYNTON & BARNSTAPLE RAILWAY WEBSITE).

FIGURE 12: PHOTOGRAPH OF THE VIADUCT IN 1935; VIEWED FROM THE NORTH (©PRESSREADERS WEBSITE).

FIGURE 13: THE VIADUCT AND HOUSE (BLOCK 1A) IN THE 1960S; VIEWED FROM THE SOUTH-WEST (©LYNTON & BARNSTAPLE RAILWAY WEBSITE).

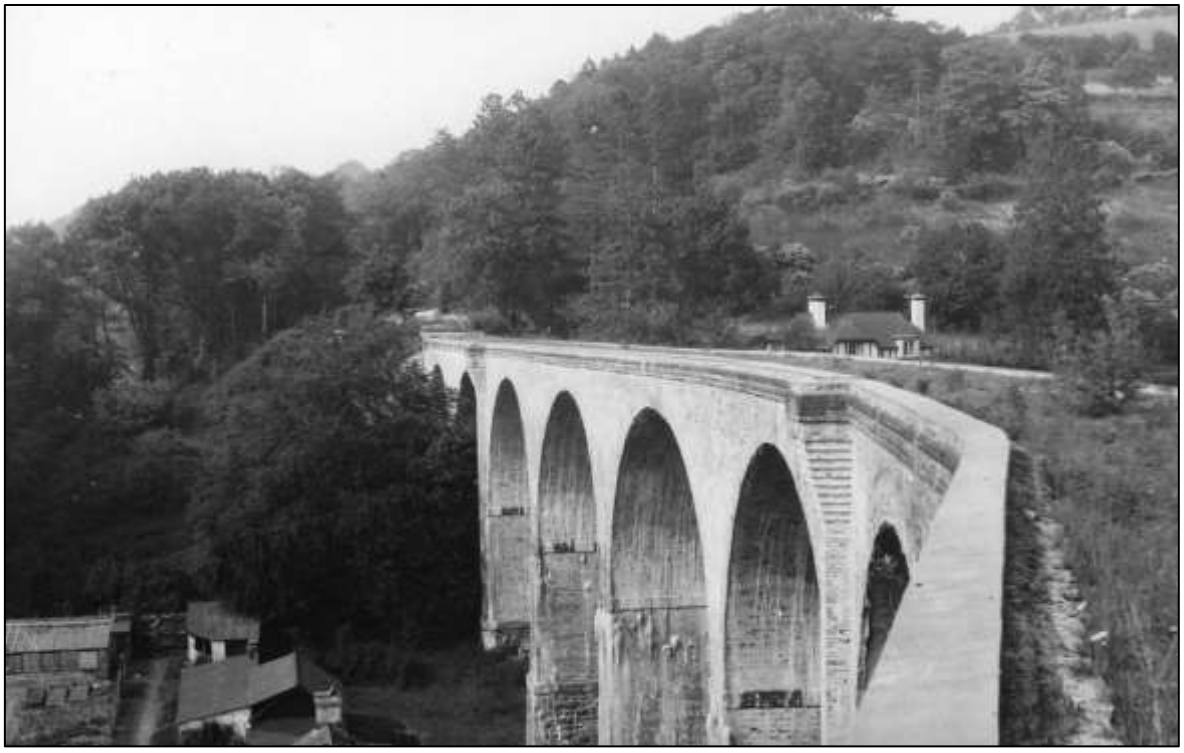

FIGURE 14: THE VIADUCT AND ALLOTMENT BELOW (LEFT) IN THE 1960S; VIEWED FROM THE SOUTH (©LYNTON & BARNSTAPLE RAILWAY WEBSITE).

FIGURE 15: THE VIADUCT WITH BLOCKS 1A (LEFT) AND 7 (RIGHT) IN THE 1960S; VIEWED FROM THE NORTH-WEST (©EXMOOR ASSOCIATES WEBSITE).

FIGURE 16: THE VIADUCT AND BLOCK 4 (CENTRE) IN THE 1960S; VIEWED FROM THE WEST (©EXMOOR ASSOCIATES WEBSITE).

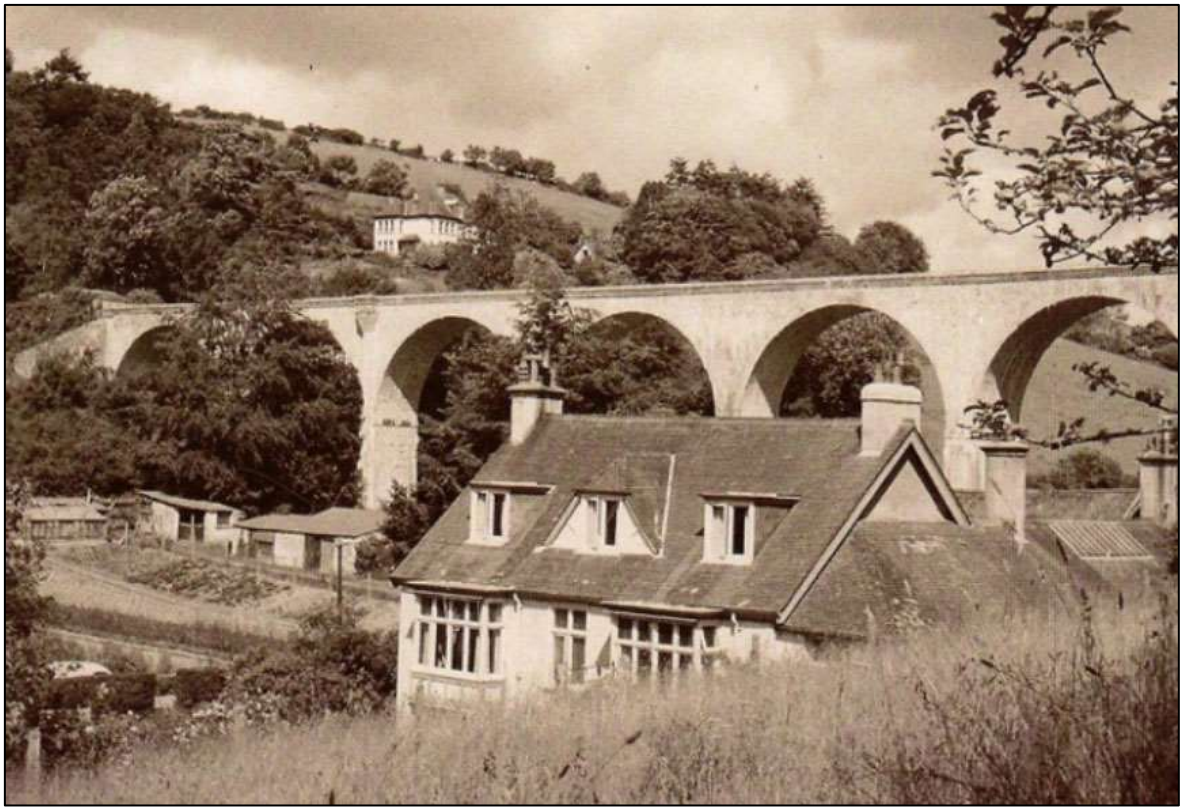

FIGURE 17: THE HOUSE (BLOCK 7) WITH THE VIADUCT BEHIND, IN THE 1960S; VIEWED FROM THE SOUTH-WEST (©EXMOOR ASSOCIATES WEBSITE).

FIGURE 18: THE HOUSE (BLOCK 7) AND BLOCKS 4 AND 5 IN THE 1960S, VIEWED ACROSS THE ALLOTMENT; FROM THE NORTH (©EXMOOR ASSOCIATES WEBSITE).

FIGURE 19: THE HOUSE (BLOCK 7) IN THE 1960S, VIEWED ACROSS ITS LAWN; FROM THE WEST (©EXMOOR ASSOCIATES WEBSITE).

FIGURE 20: THE HOUSE (BLOCK 7) WITH MILL BEHIND (BLOCK 6) IN THE 1960S; VIEWED FROM THE WNW (©EXMOOR ASSOCIATES WEBSITE).

3.6 BUILDING APPRAISAL

The site of the former school lies at the confluence of the River Yeo and a tributary dropping down from Stoke Rivers/Chelfham. It is straddled by the impressive Grade II Listed Chelfham viaduct built between 1896 and 1897. The site occupies the base and lower slopes of the valley on both sides. The river flows through the middle of the site and is bridged in several places, with evidence of historic and fairly recent flooding. There are the remains of a sluice gate under the viaduct.

To the west the site is enclosed by a curving slatestone rubble boundary wall. To the western side of the site there is a with car park, with gardens to the west, south and south-west, and a large open field to the east beyond the viaduct. There are eight main separate or linked ranges of buildings: Blocks 1-3 to the north of the river; Blocks 4 and 5, small low blocky buildings alongside the river on its southern side; Blocks 6 and 7 form the largest group of structures.

The buildings have been appraised in order to inform the Statement of Significance. The blocks have been numbered in accordance with the tour of the site led by the current caretaker.

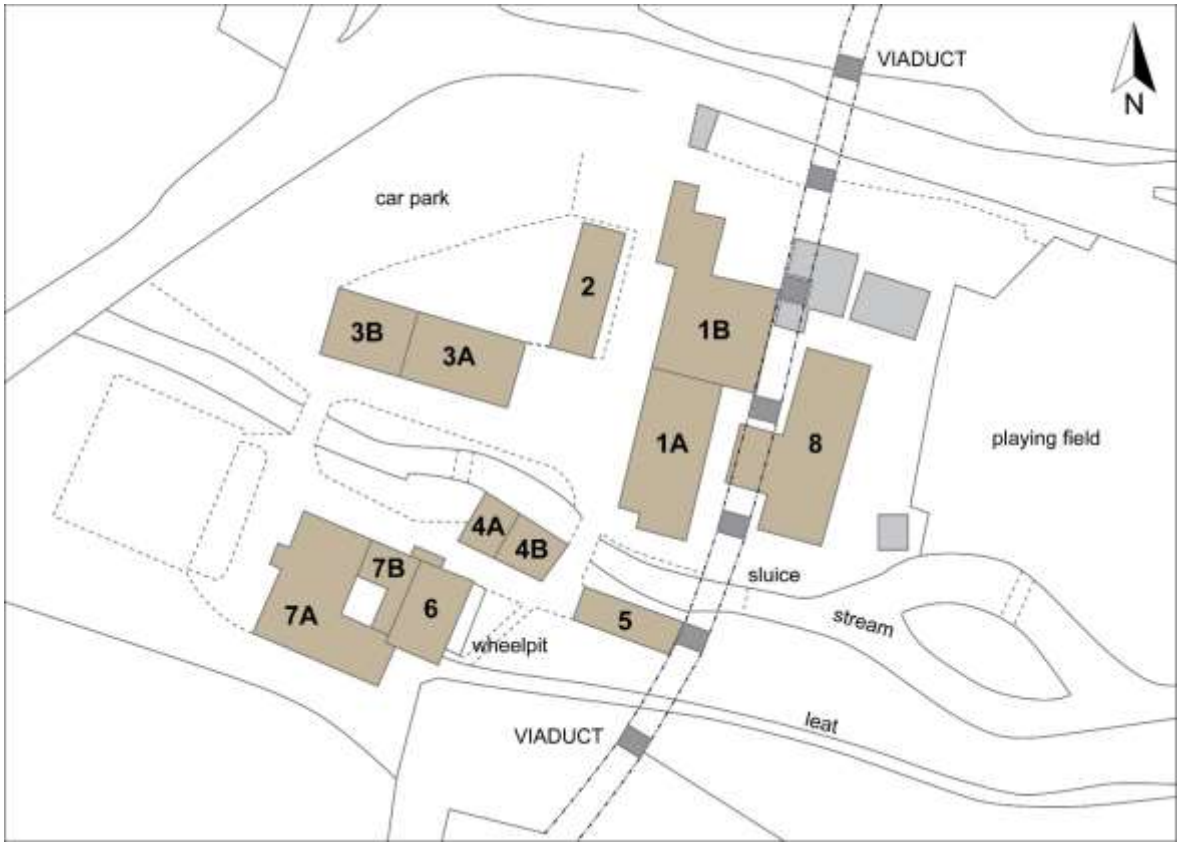

FIGURE 21: SITE PLAN SHOWING BLOCK NUMBERS.

3.6.1 BLOCK 1

A long north-south range immediately to the west of the piers of the viaduct, slightly terraced into the shallow south-facing slope. Its southern end, Block 1A, is formed of two elements, both in local slatestone vernacular rubble build with brick detailing under a shallow pitched roof of concrete tiles. As viewed from the west, to the left the building has three large ground-floor archways with three windows above, though the central window is in fact a partly infilled loading door. The fenestration and fittings have all been replaced with modern PVC. To the right, a slightly taller cottage range of two windows at first floor level over a door and archway at ground floor. The wall between the two features a heavy brick stack with scarring for a possible south gable axial stack, as evidenced by blocked fireplaces within the building. It would appear this was a mixed-use garage,

stores/stables with service accommodation. The interior of this older part of the range has been stripped and boarded out or re-plastered during conversion to residential accommodation for boarders. The blocked openings in the front wall, and one small section of patched stone flagstones would suggest some evidential value remains. Architectural interest is limited but it presents as a late Victorian or Edwardian building, traditional in its functions and of local vernacular build; however, the cartographic and photographic evidence would suggest it was built in the 1950s.

FIGURE 22: BLOCK 1 (RIGHT) AND BLOCK 2 (LEFT); VIEWED FROM THE SSW.

To the north and attached to the north gable of Block 1A is a completely new two-storey build, Block 1B, which was apparently constructed within the last 15 years or so. It is of rendered concrete block with some brick detailing to reference the earlier block. It is purpose-built, designed with residential boarding rooms, common room and covered play area. All fittings, fenestration and interiors are modern; there is no inherent value in this structure.

3.6.2 **BLOCK 2**

A low one-and-a-half-storey purpose-built classroom block, built to the west of Block 1 and parallel to it. Formed of three purpose-designed ground floor science lab classrooms, with a loft above, deeply terraced into the shallow south-facing slope. Built of rendered concrete block, with PVC windows and doors, under a concrete tiled roof. The barn-like character of this building and its fairly thick walls may mean it was developed from something earlier in date but doesn't appear on any of the historic photographs, as there seem to be sheds here until the 1950s and there are no historic features surviving or structural elements on show. Like Block 3A this is likely to date to the c.1980s, built to expand school activities on the site. There is no obvious value to either the structure or its contents/fittings.

3.6.3 **BLOCK 3**

This lies at a perpendicular angle to Block 1, on an east-west alignment and forms an L-shape with adjacent but unattached Block 2, to the north-east. A low two-storeys range of rendered concrete block under a shallow pitched roof of concrete tile, all elevations asymmetrical with PVC windows and doors. An attempt has been made to reference the larger gentry residence to the south (Block

7) by adding a central gabled dormer to each elevation. Divisible into two parts: to the east a three-window range dating to c.1980s; to the west a longer three-window extension built within the last 15 years, like Block 1B. In terms of appearance, these units present as small domestic dwellings or a converted service range. On the ground floor individual units form classrooms of different sizes, accessed from the south side, with windows to the north. At first-floor level to the east are a suite of small office and administrative rooms; to the west end are small classrooms accessed via an unlit spine corridor. All features and fittings are modern and there is no heritage value to this building.

FIGURE 23: REMAINS OF A FLOOR OF STONE FLAGS IN BLOCK 1A; VIEWED FROM THE SOUTH.

3.6.4 **BLOCK 4**

This is a small building, located immediately adjacent to the river, is divisible into two parts: to the west Block 4A, a historic single-width north-south range; to the east, Block 4B, a lower terraced extension aligned east-west.

With the exception of Block 6, Block 4A is the most vernacular building onsite and exhibits good details such as segmental brick arched openings to the west elevation with small window above; there are two forced windows in the north elevation. It is of low one-and-a-half storeys, gabled to north and south. It is built of heavy local rubble stone with a very thin coat of external cement render and painted. It has a slate roof with black ridge tiles and narrow timber painted barge boards. The south elevation has a large loading door enlarged to form a long stair window. All of its windows and doors have been replaced with PVC units. On the ground floor it has been divided into two spaces: a small science lab to the north with a stair inserted to the south. Within the science lab is a blocked door in the north-east corner and there are two boxed-in transverse beams supporting the ceiling. On the first floor there is a small classroom within the loft. The pitched roof is supported by two fairly lightweight pine trusses, crude rustic in character, overlapping at the ridge and fixed with a pair of chunky pegs. To the sides there are large single turned-over iron spikes that formerly fixed a low surface-mounted collar; this has been replaced with a high nailed collar of mid-20th century date. The trusses have been painted black with a bituminous paint; the rest of the

ceiling is concealed by plasterboard. The detail of the opening and the roof structure would hint at a later 18th or early 19th century date for this small building. It is likely to be an early ancillary mill building and is of architectural and historic vernacular interest. There is evidential value in the visible and concealed historic features present and it may have associative value with the adjacent mill building. This structure is not proposed for demolition and indeed it would be hard to justify it. The building is no longer particularly authentic in how it presents but features like the boxed-in beams and blocked doorways show integrity is high and it may be possible to renovate this structure and bring it back into use. It forms a valuable group with the river, mill and wheel, as well as the silted up leat just above. More indirectly, this provides an important sense of place and context to the viaduct, predating it and defining it as a late infrastructure feature that bisected the earlier rural landscape.

FIGURE 24: BLOCK 2 (LEFT) AND BLOCK 2 (RIGHT); VIEWED FROM THE NORTH-WEST.

Block 4B to the east abuts the earlier building, with doorways forced between them. It is solidly built, perhaps stone, but more thickly rendered and painted with a more recent slate roof. Windows have been forced in its north wall and rooflights added to the loft. It contains another ground floor classroom space with a small loft above. The roof is carried by heavy sawn common rafter trusses. The historic photos suggest the walls have been raised since the 1960s (Figure 18), converting a mono-pitch roof into a pitched one. As with all the other buildings, it lacks authenticity following its conversion to school use. There may be inherent evidential value in this structure in its form or in how it relates to Block 4A.

3.6.5 **BLOCK 5**

Low lying single storey shed, set into the north-facing steep slope. Rendered solid walls and shallow mono-pitch roof. One long internal space, used as a music recording studio, with a boarded-out ceiling. The build of this is quite heavy and its relatively small size means it is quite possible this is a small outbuilding relating to the mill. It exhibits no visible historic features, fittings or structure. It has no visible heritage value but may have some inherent evidential value, value that could only be determined once it was stripped out.

FIGURE 25: THE WEST AND NORTH ELEVATIONS OF BLOCK 4A; VIEWED FROM THE WNW.

3.6.6 **BLOCK 6**

This is a typical former three-storey mill building, set back from the river behind Block 4. A leat, bounded by low stone walls, passes beneath the viaduct and addresses the building from the east-south-east.

This building is of heavy local slatestone rubble, externally painted. It has a steeply pitched but sagging slate roof with red terracotta ridge tiles. Its north elevation has three symmetrically placed central openings; the lowest one looks forced, the upper two are altered from loading doors, to the top is a surviving pulley wheel and brace. To the east side is a large and partly silted wheelpit that still contains the remains of an over-shot timber paddle and metal-framed waterwheel. There is a small window to the ground floor that might be set into a blocked doorway, above this there are four small altered openings at first floor level. The south elevation, set into the bank, may have been blind but there is now a forced doorway at the third-floor attic level served by a modern metal fire-escape. The west elevation is concealed by a c.1990s extension that links it to Block 7. Within the interior on the ground floor there are several changes of level and to the west wall there is a large partly infilled opening with a massive bresummer beam. This has been remodelled as a fireplace but was probably a large doorway or machinery opening. To the first floor the mill has forced doorways linking it to the modern extension to the west and the space has been divided up by modern plasterboard partitions into small staff night-duty bedrooms and en-suite bathrooms. At loft level the feet of the roof trusses are visible but are boxed-in; they look heavy but no further conclusions can be drawn. The ceiling is also boarded in. This space is used as a store.

This building is of architectural interest and historic vernacular build. It holds evidential value in the visible and obscured historic features it contains and may have added associative value with the adjacent Block 4. This is not proposed for demolition and it would be hard to justify it. The building is no longer particularly authentic in how it presents, but features like the wheel, boxed-in beams/ trusses and blocked doorways show integrity is high and it may be possible to renovate this structure and bring it back into use. It forms a valuable group with the river and Block 4 (less so

Block 7), as well as the silted up leat just above. More indirectly, this lends an important sense of place and context to the viaduct.

FIGURE 26: THE NORTH ELEVATION OF BLOCK 6; VIEWED FROM THE NORTH-WEST.
FIGURE 27: THE WATERWHEEL ON THE EAST SIDE OF BLOCK 6; VIEWED FROM THE NNE.

3.6.7 BLOCK 7

This presents as a large late 19th century gentleman's residence. L-shaped in plan and of three storeys; without further study it cannot be ruled out that an earlier range survives embedded within the structure. It faces west with steep gardens terraced into the slope to the south-west and a large former lawn and driveway to the west. Its situation is carefully considered, and its grounds are designed to complement it. Its gardens are bounded by the river to the north and it was flanked by the historic mill and outbuilding to the east and north-east.

It has relatively thin rendered walls, with a steep slate roof with gabled dormers, applique mock-Tudor detailing to the two small gables in the north elevation and Marland brick chimneys. The west elevation has large bay windows altered to PVC units and its front door has an added modern security porch. The interior has been heavily modified but retains a hint of its former layout, with front reception rooms and a rear kitchen and services range. To some rooms plaster cornices, blocked fireplaces, some original doorframes, skirtings and dado rails survive, as well as some large cast-iron radiators. A few good beaded casement windows and transom-style windows survive. There is one good detailed beamed ceiling in the service range within what seems to be a large (now subdivided) first floor function room. This building has relatively high evidential value and some architectural value, being of a certain elaborate mixed influence aesthetic. This was used as main classroom spaces, the nurse's unit, library and kitchens and dining room. Upstairs there were further dormitory spaces and the upper attic floor was staff accommodation. The roof of the building is leaking and further water ingress will damage the property. The building is not currently authentic in the way it presents, with lots of steel fire escapes, altered openings, forced doorway and security features.

FIGURE 28: BLOCK 7; VIEWED FROM THE WNW. COMPARE TO FIGURES 19-20.

A modern linking range infills the space between Block 6 (Mill) and the L-shaped house. It is of concrete brick and steel girders and completely modern on ground and first floor, largely composed of corridors and linking spaces. It compromises both historic structures and the plan and narrative of both buildings and its removal would be a benefit, although damage to both historic assets would need to be managed.

FIGURE 29: BLOCK 8, TO THE EAST OF THE VIADUCT; VIEWED FROM THE EAST.

3.6.8 BLOCK 8

A single-storey rectangular school hall with rendered block walls painted externally, under a pitched roof of concrete tiles, gabled to north, with projecting porch to south, with double timber doors. Painted barge boards and white box profile guttering and downpipes, white PVC doors and

windows in the east wall overlooking the paddock to the rear. The interior is plastered and painted, with painted plasterboard ceiling and suspended timber floor, modern lighting and plain wooden internal doors. This is a wholly modern structure and replaces a prefabricated timber shed that stood on this site.

3.6.9 STATEMENT OF SIGNIFICANCE OF THE SITE – AS STANDING

Excluding the viaduct for the moment, there is heritage value to some of the buildings on the site, specifically Block 1a; Block 4a; Block 6 and Block 7a. Blocks 4 and 6 have particular evidential, architectural and potential historical value, as these are the two mill buildings and/or mill and outbuilding. These buildings contribute positively to the narrative of the valley and the wider agrarian processes that were pursued here by rural communities (not just milling – at one time there was a cider press). While inappropriately converted these buildings do have local significance. If, upon further stripping out of modern surface treatments, further historic features and fittings are found to survive, then these should be incorporated into any scheme moving forwards. Block 7, a late Victorian gentry residence, is of a type commonly seen in North Devon; these provided the middle classes with an out-of-town residence in close proximity to the busy district towns like Barnstaple and Bideford. It is not a particularly fine example and is much altered and affected by the stripping-out of features. Its value lies in the sense of place and continuity it provides to the setting of the Listed viaduct, as it can be seen in the historic photographs of the viaduct and usefully emphasises the size of the structure. Generally, the heritage value of the site has been significantly affected by the use of the site as a school: the interiors of all the structures have been repurposed, and externally the gardens have been lost and all the historic sheds and barn ranges replaced with purpose-built classrooms and accommodation.

The proposed development would see all standing structures apart from Block 6 demolished and replaced with a range of new residence buildings. The necessary flood alleviation works would raise ground levels either side of the watercourse and emphasize this linear feature. In general terms, the demolition of Blocks 1b, 2, 3a, 3b, 4b, 5, 7b and 8 is no great loss, as they are all 20th century structures; Block 1a has slightly more value as some period features appear to survive and may resurface during stripping out and demolition. The harm to all these structures under the proposed scheme would be *substantial*, but as the value of these structures is *negligible* and thus the magnitude of impact would be *slight* (see Table 5 in Appendix 1). Block 7a, the Victorian house, is more of a concern as this structure, while much altered, is historic in form and appearance and does retain some period fixtures and fittings. However, it is not worthy of Listing and is only of local importance; of low value and therefore there would be a *slight/moderate* magnitude of impact. This structure should, however, be properly recorded prior to demolition, with monitoring of the demolition to better understand the function of the internal spaces and the service areas.

Block 4a is a more historic structure, and its demolition would be a loss. The function of this structure is not well understood; its location next to the river would suggest it is mill-related, and as its east wall is in line with the wheelpit above it is possible the tailrace of the mill drove machinery in this lower building. However, while more detailed recording could be undertaken at this stage, as the interior is boarded out and the exterior of the east wall is concealed by Block 4b, we would not see the pattern of blocked and forced openings required to understand function. That could only take place once the interior is stripped out and Block 4b demolished or stripped out. While not of Listable quality in and of itself, its probable association with Block 6 lends value. Therefore, it should be retained if possible and its total loss would have a *slight/moderate* to *moderate/large* magnitude of impact.

Block 6 is the most historic structure on the site: a three-storey mill building with *in situ* wheel, wheelpit and leat. The leat flowed (and therefore also the tailrace) and the wheel functioned until the 1970s when it was reportedly used to generate electricity for the school (groundskeeper *pers. comm.*). The apparent lack of documentary evidence is offset by the physical evidence: a later 18th

century structure that is likely to contain additional structural evidence relating to its use hidden behind modern surface treatments. It is proposed to retain and convert this building, although it should be subject to archaeological recording with monitoring during the stripping out. Bringing the wheel back into use, if feasible, would be a clear benefit for the historic asset.

3.6.10 ARCHAEOLOGICAL POTENTIAL

The building appraisal has highlighted that there is a historic mill complex on the site, possibly of two phases and going back as far as the later 1700s. The presence of the standing mill and location at a tributary junction with the River Yeo may suggest a longer heritage of milling here and therefore there could be archaeological potential in the areas which abound the river, although any deposits could be expected to be significantly affected by the later building work. There may also be evidence surviving below the modern tarmac near the viaduct of the timber scaffolding and the construction processes which went into its building in the 1890s. However, levels of disturbance are likely to be quite high given the amount of construction and landscaping work that has taken place in the latter 20th and 21st century. In terms of earlier archaeological remains, the position of the site on a flood plain close to the confluence of the watercourse with the River Yeo makes flooding a likelihood and earlier occupation less likely.

3.7 IMPACT SUMMARY

The direct *effect* of the development would be the disturbance or destruction of archaeological features or deposits present within the footprint of the development; the *impact* of the development would depend on the presence and significance of archaeological features and the value of the standing structures.

For most of the structures on the site the proposed development would constitute a *major* effect; however, as most are of *low* or *negligible* heritage value the harm is not particularly pronounced. There would be an issue with the demolition of Block 4a.

This consideration of the site would indicate its archaeological value is likely to be *low* but with *moderate* potential for post-medieval mill infrastructure. The effect of the proposed development on below-ground deposits would be greatest adjacent to the watercourse where flood alleviation measures would need to be taken, but elsewhere ground levels are to be made up and thus any archaeological features or deposits would be protected. The caveat would be that if the engineering solution is likely to include piling this would still have an – albeit much reduced – impact on buried remains.

3.7.1 RECOMMENDATIONS

Block 1a – this has some blocked doorways and obscured features such as fireplaces, as well as at least one damaged stone flagged floor surviving. Reactive monitoring of the stripping of plaster, and active monitoring during demolition, would provide further information and more fully develop a record of the narrative of the wider site.

Block 4a – this should be retained if possible as it is not fully understood. If it is to be demolished due to its proximity to the watercourse then it should be fully recorded prior to removal. Block 4b could be recorded photographically at the same time, for context.

Block 6 – this should be retained. Its stripping out and clearing before restoration should be monitored so concealed features can be recorded; it should then be fully recorded as is appropriate to a locally important undesignated heritage asset. Care should be taken to restore the waterwheel, and it may be appropriate to survey and record the leat for at least a short distance to ensure understanding of the wider water management system if levels are to be significantly altered during the proposed development.

Archaeology – A staged programme of archaeological works carried out in accordance with a Written Scheme of Investigation (WSI) and involving evaluation trenching and possible subsequent targeted area investigation would be appropriate to mitigate the potential for harm in this instance.

TABLE 1: SUMMARY OF DIRECT IMPACTS.

Asset	Value	Magnitude of Impact	Assessment	Overall Assessment
Block 1a	Low	Major	Slight/Moderate	Negative/Minor
After mitigation				*Negligible*
Block 1b	Negligible	Major	Slight	Negligible
Block 2	Negligible	Major	Slight	Negligible
Block 3	Negligible	Major	Slight	Negligible
Block 4a	Low to Medium	Major	Slight/Moderate to Moderate/Large	Negative/Substantial
After mitigation				*Negative/Minor*
Block 4b	Negligible	Major	Slight	Negligible
Block 5	Negligible	Major	Slight	Negligible
Block 6	Medium	Moderate	Moderate	Negative/Minor to Positive/Minor
Block 7a	Low to Medium	Major	Slight/Moderate to Moderate/Large	Negative/Moderate
After mitigation				*Negligible*
Block 7b	Negligible	Major	Slight	Negligible
Block 8	Negligible	Major	Slight	Negligible
Unidentified archaeological features	Unknown	Major	Low	Negative/Moderate to Negative/Substantial
After mitigation	Negligible	Minor	Neutral/Slight	Neutral/Negligible

4.0 INDIRECT IMPACTS

4.1 STRUCTURE OF THE ASSESSMENT

For the purposes of this assessment, the *indirect effect* of a development is taken to be its effect on the wider historic environment. The principal focus of such an assessment falls upon identified designated heritage assets like Listed buildings or Scheduled Monuments. Depending on the nature of the heritage asset concerned, and the size, character and design of a development, its effect – and principally its visual effect – can impact on designated assets up to 20km away. The methodology adopted in this document is based on that outlined in *The Setting of Heritage Assets* (GPA3 Historic England 2015, revised 2017), with reference to ICOMOS (2011) and DoT (DMRB, WEBTAG) guidance. The assessment of effect at this stage of a development is an essentially subjective one, but one based on the experience and professional judgement of the authors. Appendix 1 details the methodology employed.

This report follows the staged approach to proportionate decision making outlined in *The Setting of Heritage Assets* (Historic England 2015, 6). *Step one* is to identify the designated heritage assets that might be affected by the development. The first stage of that process is to determine an appropriate search radius, and this would vary according to the height, size and/or prominence of the proposed development. For instance, the search radius for a wind turbine, as determined by its height and dynamic character, would be much larger than for a single house plot or small agricultural building. The second stage in the process is to look at the heritage assets within the search radius and assign to one of three categories:

- Category #1 assets: Where proximity to the proposed development, the significance of the heritage asset concerned, or the likely magnitude of impact, demands detailed consideration.
- Category #2 assets: Assets where location and current setting would indicate that the impact of the proposed development is likely to be limited, but some uncertainty remains
- Category #3 assets: Assets where location, current setting, significance would strongly indicate the impact would be no higher than negligible and detailed consideration both unnecessary and disproportionate. These assets are still listed in the impact summary table.

For *Step two* and *Step three*, and with an emphasis on practicality and proportionality (*Setting of Heritage Assets* p15 and p18), this assessment then groups and initially discusses heritage assets by category (e.g. churches, historic settlements, funerary remains etc.) to avoid repetitious narrative; each site is then discussed individually, and the particulars of each site teased out. The initial discussion establishes the baseline sensitivity of a given category of monument or building to the potential effect, the individual entry elaborates on local circumstance and site-specific factors. The individual assessments should be read in conjunction with the overall discussion, as the impact assessment is a reflection of both.

4.2 QUANTIFICATION

With an emphasis on practicality and proportionality (see *Setting of Heritage Assets* p15 and p18), only those assets where there is the possibility for an effect greater than negligible (see Table 5 in Appendix 1) are considered here in detail. Given the topographical setting of the proposed development, only one designated structure is considered here:

- Category #1 assets: GII Viaduct.

4.3 IMPACT BY CLASS OF MONUMENT OR STRUCTURE

4.3.1 INDUSTRIAL BUILDINGS AND INFRASTRUCTURE

A range of industrial and extractive structures, often exhibiting elements of formal planning, rarely with a view to aesthetics

A whole range of structures relating to a whole range of industries falls under this broad category, and include ruined, standing and functioning buildings. This might include: bridges, canals, capstans, clay-drying facilities, engine houses, fish cellars, gunpowder mills, railways, warehouses and so forth. However, in many instances industrial buildings were not built with aesthetics in mind, despite the elements of formal planning that would often be present. The sensitivity of these structures to the visual intrusion of a development depends on type, age and location. It is usually the abandoned and ruined structures, now overgrown and 'wild', that are most sensitive to intrusive new visual elements.

FIGURE 30: THE VIADUCT WITH THE CANALISED RIVER RUNNING BETWEEN BLOCK 1 AND BLOCK 4; FROM THE WEST-SOUTH-WEST.

What is important and why

This is a very heterogeneous group, though all buildings and associated structures retain some evidential value, which ranges with the degree of preservation. Some structures are iconic (e.g. Luxulyan viaduct) and quite often others are, due to the rapid intensification of industry in the 18th and 19th centuries, innovative in both design and application (historical/illustrative). Some may survive as working examples – in which case the associational value is maintained – but many are ruinous or converted (historical/associational). All were designed, and many conform to a particular template (e.g. engine houses) although incremental development through use-life and subsequent decrepitude may conceal this. Fortuitous development may then lead to ruinous or deserted structures or building complexes taking on the air of a romantic ruin (e.g. Kennall Vale gunpowder works), imagery quite at odds with the bustle and industry of their former function. Some of the

more spectacular or well-preserved structures may become symbolic (e.g. South Crofty Mine), but communal value tends to be low, especially where public access is not possible.

Asset Name: **Chelfham Viaduct**	
Parish: Chelfham, Bratton Fleming, Barnstaple	*Value:* Medium
Designation: Grade II	*Distance to Development:* immediately adjacent
Description: Listing: Viaduct, serving the dismantled Lynton-Barnstaple railway, 1896-7. Engineer, F. W. Chanter. Yellow brick with rock-faced plinths to the piers. 400 feet long and 70 feet high. 8 tall arches with semi-circular heads springing from unmoulded impost bands. 2 shallow pilasters flank the 4 principal arches on the west side, and a single pilaster to centre on east side, all with unmoulded capitals of 8 oversailing brick courses. "More than a quarter of a million bricks were used in its construction, and the cost was about £6,500". L T Catchpole: The Lynton and Barnstaple Railway. The narrow-gauge line was closed in 1935. The largest bridge structure on a narrow-gauge line.	
Supplemental Comments: This is a large and well-preserved feature, of unusually late date and is built largely of brick instead of stone. It stands in a little-altered rural valley setting and is located on a defunct section of railway line that has an active local charity supporters' network/group. Elements of the line are once again open and running steam trains for tourists near Woody Bay station. It is fairly isolated and public access is not as good as one might expect. As a result, it is not the historic local visitor attraction one might expect, something of a hidden gem in this area. The parapet was removed after WWII but was replaced in 2003 as part of a major investment in the structure, with the long-term aim of restoring the trackbed.	
Evidential Value: Relatively low. A late period structure, the structure is well documented and photographed. The structure is well preserved by a local interest group and has been carefully studied. Detailed information on its build, cost and engineering is already recorded.	
Historical Value: High. This is apparently the tallest narrow-gauge viaduct structure within the UK network, so its rarity increases its heritage value. It is therefore historically important as a structural achievement in its own right. It has associative value for with the Lynton and Barnstaple railway, with resonance for the development of tourism in this area. The viaduct appeared in the 1943 wartime propaganda film *The Flemish Farm*.	

FIGURE 31: STILL FROM *THE FLEMISH FARM*, SHOWING THE VIADUCT STAFFED BY GERMAN SOLDIERS ON THE FRANCO-SPANISH BORDER (WWW.YOUTUBE.COM).

Aesthetic Value: High. This is a dramatic and visually striking structure. Unusually, ceramic brick is used as the principal material, providing an unusually modern and very sleek appearance, seemingly more lightweight than one would expect with a stone build.
Communal Value: Low. The viaduct forms part of the Lynton and Barnstaple Railway Line, and a stated aim of the Lynton and Barnstaple Trust is to (eventually) restore the railway line. The viaduct provides a clear visual goal for the group.
Authenticity: High; the viaduct is non-operational but well preserved and intact. The parapet is a recent replacement.
Integrity: High; the viaduct is well maintained by the Lynton to Barnstaple Trust. It is intact and in excellent condition.
Topographical Location and Landscape Context: The viaduct crosses the Chelfham/Stoke Rivers valley on a shallow south-west to north-east alignment. The valley here widens as it opens onto the larger twisting Yeo valley that runs down to the Taw estuary. The viaduct branches off from the mid to upper slopes, carrying the smoothest line through the steep terrain. The landscape context is restricted solely to the valley system.
Principal Views: The most important views of the viaduct would be along and across it, when moving along the former railway line. From the ground there are views towards it from the east, from along the valley road to Chelfham and from the south-west on the approach from the road from Barnstaple. There is a key view of the viaduct including the former mill from the north-west on the approach on the Lynton road, just before the road junction.
Landscape Presence: The viaduct is totally dominant visually and physically within its immediate setting, but this setting is restricted at a landscape level by the character of the steep-sided valleys, to an east-west alignment widening a little to the west where it meets the valley of the River Yeo. The re-wilding of the valley sides, once much more open, has further restricted views of this viaduct from further away.
Immediate Setting: The viaduct crosses the narrow, deep Chelfham/Stoke Rivers valley which carries a small tributary west into the River Yeo, which runs broadly north-south here. Immediately to the north-east of the viaduct is a fine small late Victorian cottage, the former station master's house, with the station itself just beyond on the north side of the valley, in a slight cutting now screened by trees, both of which are contemporary to the viaduct. Below the viaduct on the south-west side is the historic mill and farmstead that predated the viaduct. The historic photographs indicate the valley was once far more open, with steep open grassy slopes.
Wider Setting: The main district centre of Barnstaple lies six miles to the south-west; the viaduct stands close to the main road system from Barnstaple to Coombe Martin and Lynton. Lynton, the final stop for the railway, lies about 14 miles to the north-east. Within the same valley, just to the east, lies the small farming hamlet of Chelfham and further north-east on higher ground is Bratton Fleming. Otherwise this area is quite remote, previously limited by the steep valley topography.
Enhancing Elements: The immediate environs of the viaduct are carefully restored and well maintained by the Lynton and Barnstaple Trust.
Detracting Elements: The visual clutter of the former school below detracts from the views across to the viaduct from the west.
Direct Effects: Physical effects to the viaduct are not anticipated. However, if there is a significant alteration of levels, drainage and strengthening works may be needed to satisfy the concern of the Environment Agency over flooding.
Indirect Effects: Demolishing most of the buildings on the former school site and replacing them with rows of terraced or detached/semi-detached blocks of houses will make a significant material change to the physical setting of the Listed viaduct and views to and from the structure. If those buildings – which include several of limited intrinsic merit – are removed and replaced, the magnitude of the effect will depend heavily on the design and massing of the proposed replacements. The older mill structure and house provide a sense of place and context for the relatively late feature. Increasing the number of buildings and spreading them out to encompass more of the site will clutter the immediate setting of the viaduct and obscure views to its piers. The mill and house predate the viaduct and were associated with a range of other service structures (some of which survive – e.g. Block 1), so small simple rural structures have always clustered around the base of the viaduct. Until the School was established in the 1960s these structures related to the house/garden. Even as a school its profile is fairly simple and fields, gardens and woods were maintained on the site. As the viaduct was constructed primarily as a tourist railway, designed to link pockets of settlement through a picturesque landscape, unless the proposed development is carefully considered and designed it runs the risk of transplanting a rather incongruous suburban estate into a very rural area. This would undermine the narrative of the Listed structure.
Contribution of Setting to the Significance of the Asset: Incidental. The contribution of setting to the significance of this particular heritage asset is twofold: Firstly, the viaduct is a tall and impressive industrial monument which is best experienced if clear views are possible to most of the structure. Views to and from the viaduct would be negatively impacted by the development of a housing estate around the base of its piers. Secondly, a principal function for the railway line linking Barnstaple to Lynton was to carry tourists to the North Devon coast from the main lines. The journey was almost as important as the destination, and it carried the train through the picturesque North Devon countryside.

As noted, the development of a housing estate at the viaduct effects the perception of that environment, although admittedly views directly down from viaduct itself are at least partly screened by the structure itself.
Magnitude of Impact: Medium to High value asset + Moderate change = Moderate to Moderate/Large Impact
Overall Impact Assessment: **Negative/Moderate Impact**

4.3.2 HISTORIC LANDSCAPE

General Landscape Character

The landscape of the British Isles is highly variable, both in terms of topography and historical biology. Natural England has divided the British Isles into numerous 'character areas' based on topography, biodiversity, geodiversity and cultural and economic activity. The County Councils and AONBs have undertaken similar exercises, as well as Historic Landscape Characterisation.

Some character areas are better able to withstand the visual impact of development than others. Rolling countryside with wooded valleys and restricted views can withstand a larger number of sites than an open and largely flat landscape overlooked by higher ground. The English landscape is already populated by a large and diverse number of intrusive modern elements, e.g. electricity pylons, factories, modern housing estates, quarries, and turbines, but the question of cumulative impact must be considered. The aesthetics of individual developments is open to question, and site specific, but as intrusive new visual elements within the landscape, it can only be **negative**.

The proposed site would be constructed within the ***5C: Downland*** Landscape Character Area (LCA):

- This LCA covers the North Devon Downs, including the elevated ridges between Combe Martin, Berrynarbour and Ilfracombe. It comprises an area of high open farmland with broad, rounded ridges slowly dropping in altitude towards Barnstaple and the Taw-Torridge estuary. Hill summits afford expansive views across the landscape and beyond. Bands of sandstone, shales and mudstone result in an undulating topography. This LCA is a simple agricultural landscape dominated by the sky. There are a mixture of medium-scale curving medieval fields and larger post-medieval and modern fields with dead-straight boundaries and some areas of open downland. The LCA has a sparsely settled and peaceful character, with dispersed farmsteads sited in dips in the landform and nucleated villages and hamlets located in tributary valleys and around crossroads. The proposed development will change the industrial/institutional character of the area it sits in and will create a new settlement within a sparsely occupied area, one that would resemble a nucleated village around the piers of the viaduct. However, its visual effect would be limited to the valley itself. On that basis the impact is assessed as **negative/minor**.

4.3.3 AGGREGATE IMPACT

The aggregate impact of a proposed development is an assessment of the overall effect of a single development on multiple heritage assets. This differs from cumulative impact (below), which is an assessment of multiple developments on a single heritage asset. Aggregate impact is particularly difficult to quantify, as the threshold of acceptability will vary according to the type, quality, number and location of heritage assets, and the individual impact assessments themselves.

Based on the restricted number of assets where any appreciable effect is likely, the aggregate impact of this development is **negligible.**

4.3.4 CUMULATIVE IMPACT

Cumulative impacts affecting the setting of a heritage asset can derive from the combination of different environmental impacts (such as visual intrusion, noise, dust and vibration) arising from a single development or from the overall effect of a series of discrete developments. In the latter case, the cumulative visual impact may be the result of different developments within a single view, the effect of developments seen when

looking in different directions from a single viewpoint, of the sequential viewing of several developments when moving through the setting of one or more heritage assets.
The Setting of Heritage Assets 2011a, 25

*The key for all cumulative impact assessments is to focus on the **likely significant** effects and in particular those likely to influence decision-making.*
GLVIA 2013, 123

An assessment of cumulative impact is, however, very difficult to gauge, as it must take into account existing, consented and proposed developments. The threshold of acceptability has not, however, been established, and landscape capacity would inevitability vary according to landscape character. The proposed development is the only proposed development in the immediate area, with applications in this area since 1990 being almost exclusively for extensions to existing buildings. With that in mind, an assessment of **neutral** is appropriate.

TABLE 2: SUMMARY OF IMPACTS.

Asset	Type	Distance	Value	Magnitude of Impact	Assessment	Overall Assessment
Indirect Impacts						
Chelfham Viaduct	GII	On site	Medium-High	Moderate	Moderate/Large	Negative/Moderate
Indirect Impacts						
Historic Landscape	n/a	n/a	High	Minor	Moderate/Slight	Negative/Minor
Aggregate Impact	n/a	n/a				Negligible
Cumulative Impact	n/a	n/a				Neutral

5.0 CONCLUSION

The Chelfham Mill site straddles the boundary between the parishes of Goodleigh and Bratton Fleming; the original mill site was located on the southern (Goodleigh) side of this boundary, but there appears to be little readily available information for the site. There is one possible reference to a fulling mill in 1458, but the fact it appears on the tithe map as *Grubbs House* rather than *Grubbs Mill* would imply it was reconstituted as a mill in the later 19th century. When the mill ceased to operate is also unknown. The house served as a guesthouse run by Mrs Little and Mrs Ogden in the 1960s but became an independent boarding school for boys with emotional and behavioural issues in 1967. The school closed in 2015 following allegations of abuse and a former groundsman was imprisoned in 2018.

In terms of the standing structures, Block 6 should be repaired and retained, a better understanding of the original function of Block 4a needs to be achieved before it can be considered for demolition, and Block 1a should be recorded before demolition; the other buildings are of no historical merit. Mitigation in the form of building recording with monitoring works is appropriate for Block 1a, Block 4a, Block 6 and Block 7a.

The impact of the development on the buried archaeological resource will be **permanent** and **irreversible**, but the presence and/or significance of the archaeology remains to be established, and the impact can be mitigated through design or an appropriate programme of archaeological fieldwork.

A Grade II Listed railway viaduct on the Lynton to Barnstaple railway line straddles the site, and the site contains an undesignated former mill, late Victorian house and school buildings. The historic mill complex may be of two phases, and the structure might date back as far as the late 1700s; the location of the site, on a stream close to its confluence with the Yeo, would imply a longer history of milling here. The archaeological potential of those area next to the stream is therefore enhanced, with the caveat that later building works are likely to have had a significant impact on archaeological deposits or features. Evidence relating to the construction of the viaduct may also survive around the base of the piers.

In terms of indirect impacts, the only designated structure where there will be an appreciable effect is the Grade II Listed Chelfham Viaduct. The character of its immediate setting would change considerably (**negative/moderate**), but with a less pronounced impact on the historic landscape (**negative/minor**), no cumulative impact (**neutral**) and a minor aggregate impact (**negligible**).

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APPENDIX 1: IMPACT ASSESSMENT METHODOLOGY

Heritage Impact Assessment - Overview

The purpose of heritage impact assessment is twofold: Firstly, to understand – insofar as is reasonable practicable and in proportion to the importance of the asset – the significance of a historic building, complex, area or archaeological monument (the 'heritage asset'). Secondly, to assess the likely effect of a proposed development on the heritage asset (direct impact) and its setting (indirect impact). This methodology employed in this assessment is based on the staged approach advocated in *The Setting of Heritage Assets* (GPA3 Historic England 2015), used in conjunction with the ICOMOS (2011) and DoT (DMRB vol.11; WEBTAG) guidance. This Appendix contains details of the methodology used in this report.

National Policy

General policy and guidance for the conservation of the historic environment are now contained within the *National Planning Policy Framework* (Department for Communities and Local Government 2018). The relevant guidance is reproduced below:

Paragraph 189

In determining applications, local planning authorities should require the applicant to describe the significance of any heritage assets affected, including the 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. As a minimum the relevant historic environment record should be consulted, and the heritage assets assessed using appropriate expertise where necessary. Where a site on which a development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Paragraph 190

Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

A further key document is the Planning (Listed Buildings and Conservation Areas) Act 1990, in particular section 66(1), which provides *statutory protection* to the setting of Listed buildings:

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.

Cultural Value – Designated Heritage Assets

The majority of the most important ('nationally important') heritage assets are protected through *designation*, with varying levels of statutory protection. These assets fall into one of six categories, although designations often overlap, so a Listed early medieval cross may also be Scheduled, lie within the curtilage of Listed church, inside a Conservation Area, and on the edge of a Registered Park and Garden that falls within a world Heritage Site.

Listed Buildings

A Listed building is an occupied dwelling or standing structure which is of special architectural or historical interest. These structures are found on the *Statutory List of Buildings of Special Architectural or Historic Interest.* The status of Listed buildings is applied to 300,000-400,000 buildings across the United Kingdom. Recognition of the need to protect historic buildings began after the Second World War, where significant numbers of buildings had been damaged in the county towns and capitals of the United Kingdom. Buildings that were considered to be of 'architectural merit' were included. The Inspectorate of Ancient Monuments supervised the collation of the list, drawn up by members of two societies: The Royal Institute of British Architects and the Society for the Protection of Ancient Buildings. Initially the lists were only used to assess which buildings should receive government grants to be repaired and conserved if damaged by bombing. The *Town and Country Planning Act 1947* formalised the process within England and Wales, Scotland and Ireland following different procedures. Under the 1979 *Ancient Monuments and Archaeological Areas Act* a structure cannot be considered a Scheduled Monument if it is occupied as a dwelling, making a clear distinction in the treatment of the two forms of heritage asset. Any alterations or works intended to a Listed Building must first acquire

Listed Building Consent, as well as planning permission. Further phases of 'listing' were rolled out in the 1960s, 1980s and 2000s; English Heritage advise on the listing process and administer the procedure, in England, as with the Scheduled Monuments.

Some exemption is given to buildings used for worship where institutions or religious organisations (such as the Church of England) have their own permissions and regulatory procedures. Some structures, such as bridges, monuments, military structures and some ancient structures may also be Scheduled as well as Listed. War memorials, milestones and other structures are included in the list, and more modern structures are increasingly being included for their architectural or social value.

Buildings are split into various levels of significance: Grade I (2.5% of the total) representing buildings of exceptional (international) interest; Grade II* (5.5% of the total) representing buildings of particular (national) importance; Grade II (92%) buildings are of merit and are by far the most widespread. Inevitably, accuracy of the Listing for individual structures varies, particularly for Grade II structures; for instance, it is not always clear why some 19th century farmhouses are Listed while others are not, and differences may only reflect local government boundaries, policies and individuals.

Other buildings that fall within the curtilage of a Listed building are afforded some protection as they form part of the essential setting of the designated structure, e.g. a farmyard of barns, complexes of historic industrial buildings, service buildings to stately homes etc. These can be described as having *group value*.

Conservation Areas
Local authorities are obliged to identify and delineate areas of special architectural or historic interest as Conservation Areas, which introduces additional controls and protection over change within those places. Usually, but not exclusively, they relate to historic settlements, and there are c.7000 Conservation Areas in England.

Scheduled Monuments
In the United Kingdom, a Scheduled Monument is considered an historic building, structure (ruin) or archaeological site of **'national importance'**. Various pieces of legislation, under planning, conservation, etc., are used for legally protecting heritage assets given this title from damage and destruction; such legislation is grouped together under the term 'designation', that is, having statutory protection under the *Ancient Monuments and Archaeological Areas Act 1979*. A heritage asset is a part of the historic environment that is valued because of its historic, archaeological, architectural or artistic interest; those of national importance have extra legal protection through designation. Important sites have been recognised as requiring protection since the late 19th century, when the first 'schedule' or list of monuments was compiled in 1882. The conservation and preservation of these monuments was given statutory priority over other land uses under this first schedule. County Lists of the monuments are kept and updated by the Department for Culture, Media and Sport. In the later 20th century sites are identified by English Heritage (one of the Government's advisory bodies) of being of national importance and included in the schedule. Under the current statutory protection any works required on or to a designated monument can only be undertaken with a successful application for Scheduled Monument Consent. There are 19,000-20,000 Scheduled Monuments in England.

Registered Parks and Gardens
Culturally and historically important 'man-made' or 'designed' landscapes, such as parks and gardens are currently "listed" on a non-statutory basis, included on the 'Register of Historic Parks and Gardens of special historic interest in England' which was established in 1983 and is, like Listed Buildings and Scheduled Monuments, administered by Historic England. Sites included on this register are of **national importance** and there are currently 1,600 sites on the list, many associated with stately homes of Grade II* or Grade I status. Emphasis is laid on 'designed' landscapes, not the value of botanical planting. Sites can include town squares and private gardens, city parks, cemeteries and gardens around institutions such as hospitals and government buildings. Planned elements and changing fashions in landscaping and forms are a main focus of the assessment.

Registered Battlefields
Battles are dramatic and often pivotal events in the history of any people or nation. Since 1995 Historic England maintains a register of 46 battlefields in order to afford them a measure of protection through the planning system. The key requirements for registration are battles of national significance, a securely identified location, and its topographical integrity – the ability to 'read' the battle on the ground.

World Heritage Sites

Arising from the UNESCO World Heritage Convention in 1972, Article 1 of the Operational Guidelines (2015, no.49) states: 'Outstanding Universal Value means cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity'. These sites are recognised at an international level for their intrinsic importance to the story of humanity and should be accorded the highest level of protection within the planning system.

Value and Importance

While every heritage asset, designated or otherwise, has some intrinsic merit, the act of designation creates a hierarchy of importance that is reflected by the weight afforded to their preservation and enhancement within the planning system. The system is far from perfect, impaired by an imperfect understanding of individual heritage assets, but the value system that has evolved does provide a useful guide to the *relative* importance of heritage assets. Provision is also made for heritage assets where value is not recognised through designation (e.g. undesignated 'monuments of Schedulable quality and importance' should be regarded as being of *high* value); equally, there are designated monuments and structures of *low* relative merit.

TABLE 3: THE HIERARCHY OF VALUE/IMPORTANCE (BASED ON THE DMRB VOL.11 TABLES 5.1, 6.1 & 7.1).

Hierarchy of Value/Importance	
Very High	Structures inscribed as of universal importance as World Heritage Sites; Other buildings of recognised international importance; World Heritage Sites (including nominated sites) with archaeological remains; Archaeological assets of acknowledged international importance; Archaeological assets that can contribute significantly to international research objectives; World Heritage Sites inscribed for their historic landscape qualities; Historic landscapes of international value, whether designated or not; Extremely well-preserved historic landscapes with exceptional coherence, time-depth, or other critical factor(s).
High	Scheduled Monuments with standing remains; Grade I and Grade II* (Scotland: Category A) Listed Buildings; Other Listed buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in the Listing grade; Conservation Areas containing very important buildings; Undesignated structures of clear national importance; Undesignated assets of Schedulable quality and importance; Assets that can contribute significantly to national research objectives. Designated historic landscapes of outstanding interest; Undesignated landscapes of outstanding interest; Undesignated landscapes of high quality and importance, demonstrable national value; Well-preserved historic landscapes, exhibiting considerable coherence, time-depth or other critical factor(s).
Medium	Grade II (Scotland: Category B) Listed Buildings; Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical associations; Conservation Areas containing buildings that contribute significantly to its historic character; Historic Townscape or built-up areas with important historic integrity in their buildings, or built settings (e.g. including street furniture and other structures); Designated or undesignated archaeological assets that contribute to regional research objectives; Designated special historic landscapes; Undesignated historic landscapes that would justify special historic landscape designation, landscapes of regional value; Averagely well-preserved historic landscapes with reasonable coherence, time-depth or other critical factor(s).
Low	Locally Listed buildings (Scotland Category C(S) Listed Buildings); Historic (unlisted) buildings of modest quality in their fabric or historical association; Historic Townscape or built-up areas of limited historic integrity in their buildings, or built settings (e.g. including street furniture and other structures); Designated and undesignated archaeological assets of local importance; Archaeological assets compromised by poor preservation and/or poor survival of contextual associations; Archaeological assets of limited value, but with potential to contribute to local research objectives; Robust undesignated historic landscapes; Historic landscapes with importance to local interest groups; Historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations.
Negligible	Buildings of no architectural or historical note; buildings of an intrusive character; Assets with very little or no surviving archaeological interest; Landscapes with little or no significant historical interest.
Unknown	Buildings with some hidden (i.e. inaccessible) potential for historic significance; The importance of the archaeological resource has not been ascertained.

Concepts – Conservation Principles

In making an assessment, this document adopts the conservation values (*evidential*, *historical*, *aesthetic* and *communal*) laid out in *Conservation Principles* (English Heritage 2008), and the concepts of *authenticity* and *integrity* as laid out in

the guidance on assessing World Heritage Sites (ICOMOS 2011). This is in order to determine the relative importance of *setting* to the significance of a given heritage asset.

Evidential Value
Evidential value (or research potential) is derived from the potential of a structure or site to provide physical evidence about past human activity and may not be readily recognised or even visible. This is the primary form of data for periods without adequate written documentation. This is the least equivocal value: evidential value is absolute; all other ascribed values (see below) are subjective.

Historical Value
Historical value (narrative) is derived from the ways in which past people, events and aspects of life can be connected via a place to the present; it can be *illustrative* or *associative*.

Illustrative value is the visible expression of evidential value; it has the power to aid interpretation of the past through making connections with, and providing insights into, past communities and their activities through a shared experience of place. Illustrative value tends to be greater if a place features the first or only surviving example of a particular innovation of design or technology.

Associative value arises from a connection to a notable person, family, event or historical movement. It can intensify understanding by linking the historical past to the physical present, always assuming the place bears any resemblance to its appearance at the time. Associational value can also be derived from known or suspected links with other monuments (e.g. barrow cemeteries, church towers) or cultural affiliations (e.g. Methodism).

Buildings and landscapes can also be associated with literature, art, music or film, and this association can inform and guide responses to those places.

Historical value depends on sound identification and the direct experience of physical remains or landscapes. Authenticity can be strengthened by change, being a living building or landscape, and historical values are harmed only where adaptation obliterates or conceals them. The appropriate use of a place – e.g. a working mill, or a church for worship – illustrates the relationship between design and function and may make a major contribution to historical value. Conversely, cessation of that activity – e.g. conversion of farm buildings to holiday homes – may essentially destroy it.

Aesthetic Value
Aesthetic value (emotion) is derived from the way in which people draw sensory and intellectual stimulation from a place or landscape. Value can be the result of *conscious design*, or the *fortuitous outcome* of landscape evolution; many places combine both aspects, often enhanced by the passage of time.

Design value relates primarily to the aesthetic qualities generated by the conscious design of a building, structure or landscape; it incorporates composition, materials, philosophy and the role of patronage. It may have associational value, if undertaken by a known architect or landscape gardener, and its importance is enhanced if it is seen as innovative, influential or a good surviving example. Landscape parks, country houses and model farms all have design value. The landscape is not static, and a designed feature can develop and mature, resulting in the 'patina of age'.

Some aesthetic value developed *fortuitously* over time as the result of a succession of responses within a particular cultural framework e.g. the seemingly organic form of an urban or rural landscape or the relationship of vernacular buildings and their materials to the landscape. Aesthetic values are where a proposed development usually have their most pronounced impact: the indirect effects of most developments are predominantly visual or aural and can extent many kilometres from the site itself. In many instances the impact of a development is incongruous, but that is itself an aesthetic response, conditioned by prevailing cultural attitudes to what the historic landscape should look like.

Communal Value
Communal value (togetherness) is derived from the meaning a place holds for people and may be closely bound up with historical/associative and aesthetic values; it can be *commemorative, symbolic*, *social* or *spiritual*.

Commemorative and symbolic value reflects the meanings of a place to those who draw part of their identity from it, or who have emotional links to it e.g. war memorials. Some buildings or places (e.g. the Palace of Westminster) can symbolise wider values. Other places (e.g. Porton Down Chemical Testing Facility) have negative or uncomfortable

associations that nonetheless have meaning and significance to some and should not be forgotten. *Social value* need not have any relationship to surviving fabric, as it is the continuity of function that is important. *Spiritual value* is attached to places and can arise from the beliefs of a particular religion or past or contemporary perceptions of the spirit of place. Spiritual value can be ascribed to places sanctified by hundreds of years of veneration or worship, or wild places with few signs of modern life. Value is dependent on the perceived survival of historic fabric or character and can be very sensitive to change. The key aspect of communal value is that it brings specific groups of people together in a meaningful way.

Authenticity
Authenticity, as defined by UNESCO (2015, no.80), is the ability of a property to convey the attributes of the outstanding universal value of the property. 'The ability to understand the value attributed to the heritage depends on the degree to which information sources about this value may be understood as credible or truthful'. Outside of a World Heritage Site, authenticity may usefully be employed to convey the sense a place or structure is a truthful representation of the thing it purports to portray. Converted farmbuildings, for instance, survive in good condition, but are drained of the authenticity of a working farm environment.

Integrity
Integrity, as defined by UNESCO (2015, no.88), is the measure of wholeness or intactness of the cultural heritage ad its attributes. Outside of a World Heritage Site, integrity can be taken to represent the survival and condition of a structure, monument or landscape. The intrinsic value of those examples that survive in good condition is undoubtedly greater than those where survival is partial, and condition poor.

Summary
As indicated, individual developments have a minimal or tangential effect on most of the heritage values outlined above, largely because almost all effects are indirect. The principle values in contention are aesthetic/designed and, to a lesser degree aesthetic/fortuitous. There are also clear implications for other value elements (particularly historical and associational, communal and spiritual), where views or sensory experience is important. As ever, however, the key element here is not the intrinsic value of the heritage asset, nor the impact on setting, but the relative contribution of setting to the value of the asset.

Setting – The Setting of Heritage Assets
The principle guidance on this topic is contained within two publications: *The Setting of Heritage Assets* (Historic England 2015) and *Seeing History in the View* (English Heritage 2011). While interlinked and complementary, it is useful to consider heritage assets in terms of their *setting* i.e. their immediate landscape context and the environment within which they are seen and experienced, and their *views* i.e. designed or fortuitous vistas experienced by the visitor when at the heritage asset itself, or those that include the heritage asset. This corresponds to the experience of its wider landscape setting.

Where the impact of a proposed development is largely indirect, *setting* is the primary consideration of any HIA. It is a somewhat nebulous and subjective assessment of what does, should, could or did constitute the lived experience of a monument or structure. The following extracts are from the Historic England publication *The Setting of Heritage Assets* (2015, 2 & 4):

The NPPF makes it clear that the setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.

Setting is not a heritage asset, nor a heritage designation. Its importance lies in what it contributes to the significance of the heritage asset. This depends on a wide range of physical elements within, as well as perceptual and associational attributes, pertaining to the heritage asset's surroundings.

While setting can be mapped in the context of an individual application or proposal, it does not have a fixed boundary and cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset because what comprises a heritage asset's setting may change as the asset and its surroundings evolve or as the asset becomes better understood or due to the varying impacts of different proposals.

The HIA below sets out to determine the magnitude of the effect and the sensitivity of the heritage asset to that effect. The fundamental issue is that proximity and visual and/or aural relationships may affect the experience of a heritage

asset, but if setting is tangential to the significance of that monument or structure, then the impact assessment will reflect this. This is explored in more detail below.

Landscape Context

The determination of *landscape context* is an important part of the assessment process. This is the physical space within which any given heritage asset is perceived and experienced. The experience of this physical space is related to the scale of the landform and modified by cultural and biological factors like field boundaries, settlements, trees and woodland. Together, these determine the character and extent of the setting.

Landscape context is based on topography and can vary in scale from the very small – e.g. a narrow valley where views and vistas are restricted – to the very large – e.g. wide valleys or extensive upland moors with 360° views. Where very large landforms are concerned, a distinction can be drawn between the immediate context of an asset (this can be limited to a few hundred metres or less, where cultural and biological factors impede visibility and/or experience), and the wider context (i.e. the wider landscape within which the asset sits).

When new developments are introduced into a landscape, proximity alone is not a guide to magnitude of effect. Dependant on the nature and sensitivity of the heritage asset, the magnitude of effect is potentially much greater where the proposed development is to be located within the landscape context of a given heritage asset. Likewise, where the proposed development would be located outside the landscape context of a given heritage asset, the magnitude of effect would usually be lower. Each case is judged on its individual merits, and in some instances the significance of an asset is actually greater outside of its immediate landscape context, for example, where church towers function as landmarks in the wider landscape.

Views

Historic and significant views are the associated and complementary element to setting, but can be considered separately as developments may appear in a designed view without necessarily falling within the setting of a heritage asset *per se*. As such, significant views fall within the aesthetic value of a heritage asset, and may be *designed* (i.e. deliberately conceived and arranged, such as within parkland or an urban environment) or *fortuitous* (i.e. the graduated development of a landscape 'naturally' brings forth something considered aesthetically pleasing, or at least impressive, as with particular rural landscapes or seascapes), or a combination of both (i.e. the *patina of age*, see below). The following extract is from the English Heritage publication *Seeing History in the View* (2011, 3):

Views play an important part in shaping our appreciation and understanding of England's historic environment, whether in towns or cities or in the countryside. Some of those views were deliberately designed to be seen as a unity. Much more commonly, a significant view is a historical composite, the cumulative result of a long process of development.

The Setting of Heritage Assets (2015, 3) lists a number of instances where views contribute to the particular significance of a heritage asset:

- Views where relationships between the asset and other historic assets or places or natural features are particularly relevant;
- Views with historical associations, including viewing points and the topography of battlefields;
- Views where the composition within the view was a fundamental aspect of the design or function of the heritage asset;
- Views between heritage assets and natural or topographic features, or phenomena such as solar and lunar events;
- Views between heritage assets which were intended to be seen from one another for aesthetic, functional, ceremonial or religious reasons, such as military or defensive sites, telegraphs or beacons, Prehistoric funerary and ceremonial sites.

On a landscape scale, views, taken in the broadest sense, are possible from anywhere to anything, and each may be accorded an aesthetic value according to subjective taste. Given that terrain, the biological and built environment, and public access restrict our theoretical ability to see anything from anywhere, in this assessment the term *principal view* is employed to denote both the deliberate views created within designed landscapes, and those fortuitous views that may be considered of aesthetic value and worth preserving. It should be noted, however, that there are distance thresholds beyond which perception and recognition fail, and this is directly related to the scale, height, massing and nature of the heritage asset in question. For instance, beyond 2km the Grade II cottage comprises a single indistinct component within the wider historic landscape, whereas at 5km or even 10km a large stately home or castle may still be recognisable. By extension, where assets cannot be seen or recognised i.e. entirely concealed within woodland, or

too distant to be distinguished, then visual harm to setting is moot. To reflect this emphasis on recognition, the term *landmark asset* is employed to denote those sites where the structure (e.g. church tower), remains (e.g. earthwork ramparts) or – in some instances – the physical character of the immediate landscape (e.g. a distinctive landform like a tall domed hill) make them visible on a landscape scale. In some cases, these landmark assets may exert landscape *primacy*, where they are the tallest or most obvious man-made structure within line-of-sight. However, this is not always the case, typically where there are numerous similar monuments (multiple engine houses in mining areas, for instance) or where modern developments have overtaken the heritage asset in height and/or massing.

Yet visibility alone is not a clear guide to visual impact. People perceive size, shape and distance using many cues, so context is critically important. For instance, research on electricity pylons (Hull & Bishop 1988) has indicated scenic impact is influenced by landscape complexity: the visual impact of pylons is less pronounced within complex scenes, especially at longer distances, presumably because they are less of a focal point and the attention of the observer is diverted. There are many qualifiers that serve to increase or decrease the visual impact of a proposed development (see Table 2), some of which are seasonal or weather-related.

Thus, the principal consideration of assessment of indirect effects cannot be visual impact *per se*. It is an assessment of the likely magnitude of effect, the importance of setting to the significance of the heritage asset, and the sensitivity of that setting to the visual or aural intrusion of the proposed development. The schema used to guide assessments is shown in Table 2 (below).

Type and Scale of Impact

The effect of a proposed development on a heritage asset can be direct (i.e. the designated structure itself is being modified or demolished, the archaeological monument will be built over), or indirect (e.g. a housing estate built in the fields next to a Listed farmhouse, and wind turbine erected near a hillfort etc.); in the latter instance the principal effect is on the setting of the heritage asset. A distinction can be made between construction and operational phase effects. Individual developments can affect multiple heritage assets (aggregate impact) and contribute to overall change within the historic environment (cumulative impact).

Construction phase: construction works have direct, physical effects on the buried archaeology of a site, and a pronounced but indirect effect on neighbouring properties. Direct effects may extend beyond the nominal footprint of a site e.g. where related works or site compounds are located off-site. Indirect effects are both visual and aural, and may also affect air quality, water flow and traffic in the local area.

Operational phase: the operational phase of a development is either temporary (e.g. wind turbine or mobile phone mast) or effectively permanent (housing development or road scheme). The effects at this stage are largely indirect and can be partly mitigated over time through provision of screening. Large development would have an effect on historic landscape character, as they transform areas from one-character type (e.g. agricultural farmland) into another (e.g. suburban).

Cumulative Impact: a single development will have a physical and a visual impact, but a second and a third site in the same area will have a synergistic and cumulative impact above and beyond that of a single site. The cumulative impact of a proposed development is particularly difficult to estimate, given the assessment must take into consideration operational, consented and proposals in planning.

Aggregate Impact: a single development will usually affect multiple individual heritage assets. In this assessment, the term aggregate impact is used to distinguish this from cumulative impact. In essence, this is the impact on the designated parts of the historic environment as a whole.

Scale of Impact

The effect of development and associated infrastructure on the historic environment can include positive as well as negative outcomes. However, all development changes the character of a local environment, and alters the character of a building, or the setting within which it is experienced. change is invariably viewed as negative, particularly within respect to larger developments; thus while there can be beneficial outcomes (e.g. positive/moderate), there is a presumption here that, as large and inescapably modern intrusive visual actors in the historic landscape, the impact of a development will almost always be **neutral** (i.e. no impact) or **negative** i.e. it will have a **detrimental impact** on the setting of ancient monuments and protected historic buildings.

This assessment incorporates the systematic approach outlined in the ICOMOS and DoT guidance (see Tables 6-8), used to complement and support the more narrative but subjective approach advocated by Historic England (see Table 5). This provides a useful balance between rigid logic and nebulous subjectivity (e.g. the significance of effect on a Grade II Listed building can never be greater than moderate/large; an impact of negative/substantial is almost never achieved). This is in adherence with GPA3 (2015, 7).

TABLE 4: MAGNITUDE OF IMPACT (BASED ON DMRB VOL.11 TABLES 5.3, 6.3 AND 7.3).

Factors in the Assessment of Magnitude of Impact – Buildings and Archaeology	
Major	Change to key historic building elements, such that the resource is totally altered; Change to most or all key archaeological materials, so that the resource is totally altered; Comprehensive changes to the setting.
Moderate	Change to many key historic building elements, the resource is significantly modified; Changes to many key archaeological materials, so that the resource is clearly modified; Changes to the setting of an historic building or asset, such that it is significantly modified.
Minor	Change to key historic building elements, such that the asset is slightly different; Changes to key archaeological materials, such that the asset is slightly altered; Change to setting of an historic building, such that it is noticeably changed.
Negligible	Slight changes to elements of a heritage asset or setting that hardly affects it.
No Change	No change to fabric or setting.
Factors in the Assessment of Magnitude of Impact – Historic Landscapes	
Major	Change to most or all key historic landscape elements, parcels or components; extreme visual effects; gross change of noise or change to sound quality; fundamental changes to use or access; resulting in total change to historic landscape character unit.
Moderate	Changes to many key historic landscape elements or components, visual change to many key aspects of the historic landscape, noticeable differences in noise quality, considerable changes to use or access; resulting in moderate changes to historic landscape character.
Minor	Changes to few key historic landscape elements, or components, slight visual changes to few key aspects of historic landscape, limited changes to noise levels or sound quality; slight changes to use or access: resulting in minor changes to historic landscape character.
Negligible	Very minor changes to key historic landscape elements, parcels or components, virtually unchanged visual effects, very slight changes in noise levels or sound quality; very slight changes to use or access; resulting in a very small change to historic landscape character.
No Change	No change to elements, parcels or components; no visual or audible changes; no changes arising from in amenity or community factors.

TABLE 5: SIGNIFICANCE OF EFFECTS MATRIX (BASED ON DRMB VOL.11 TABLES 5.4, 6.4 AND 7.4; ICOMOS 2011, 9-10).

Value of Assets	Magnitude of Impact (positive or negative)				
	No Change	Negligible	Minor	Moderate	Major
Very High	Neutral	Slight	Moderate/Large	Large/Very Large	Very Large
High	Neutral	Slight	Moderate/Slight	Moderate/Large	Large/Very Large
Medium	Neutral	Neutral/Slight	Slight	Moderate	Moderate/Large
Low	Neutral	Neutral/Slight	Neutral/Slight	Slight	Slight/Moderate
Negligible	Neutral	Neutral	Neutral/Slight	Neutral/Slight	Slight

TABLE 6: SCALE OF IMPACT.

Scale of Impact	
Neutral	No impact on the heritage asset.
Negligible	Where the developments may be visible or audible but would not affect the heritage asset or its setting, due to the nature of the asset, distance, topography, or local blocking.
Negative/minor	Where the development would have an effect on the heritage asset or its setting, but that effect is restricted due to the nature of the asset, distance, or screening from other buildings or vegetation.
Negative/moderate	Where the development would have a pronounced impact on the heritage asset or its setting, due to the sensitivity of the asset and/or proximity. The effect may be ameliorated by screening or mitigation.
Negative/substantial	Where the development would have a severe and unavoidable effect on the heritage asset or its setting, due to the particular sensitivity of the asset and/or close physical proximity. Screening or mitigation could not ameliorate the effect of the development in these instances.

TABLE 7: IMPORTANCE OF SETTING TO INTRINSIC SIGNIFICANCE.

Importance of Setting to the Significance of the Asset	
Paramount	Examples: Round barrow; follies, eyecatchers, stone circles
Integral	Examples: Hillfort; country houses
Important	Examples: Prominent church towers; war memorials
Incidental	Examples: Thatched cottages
Irrelevant	Examples: Milestones

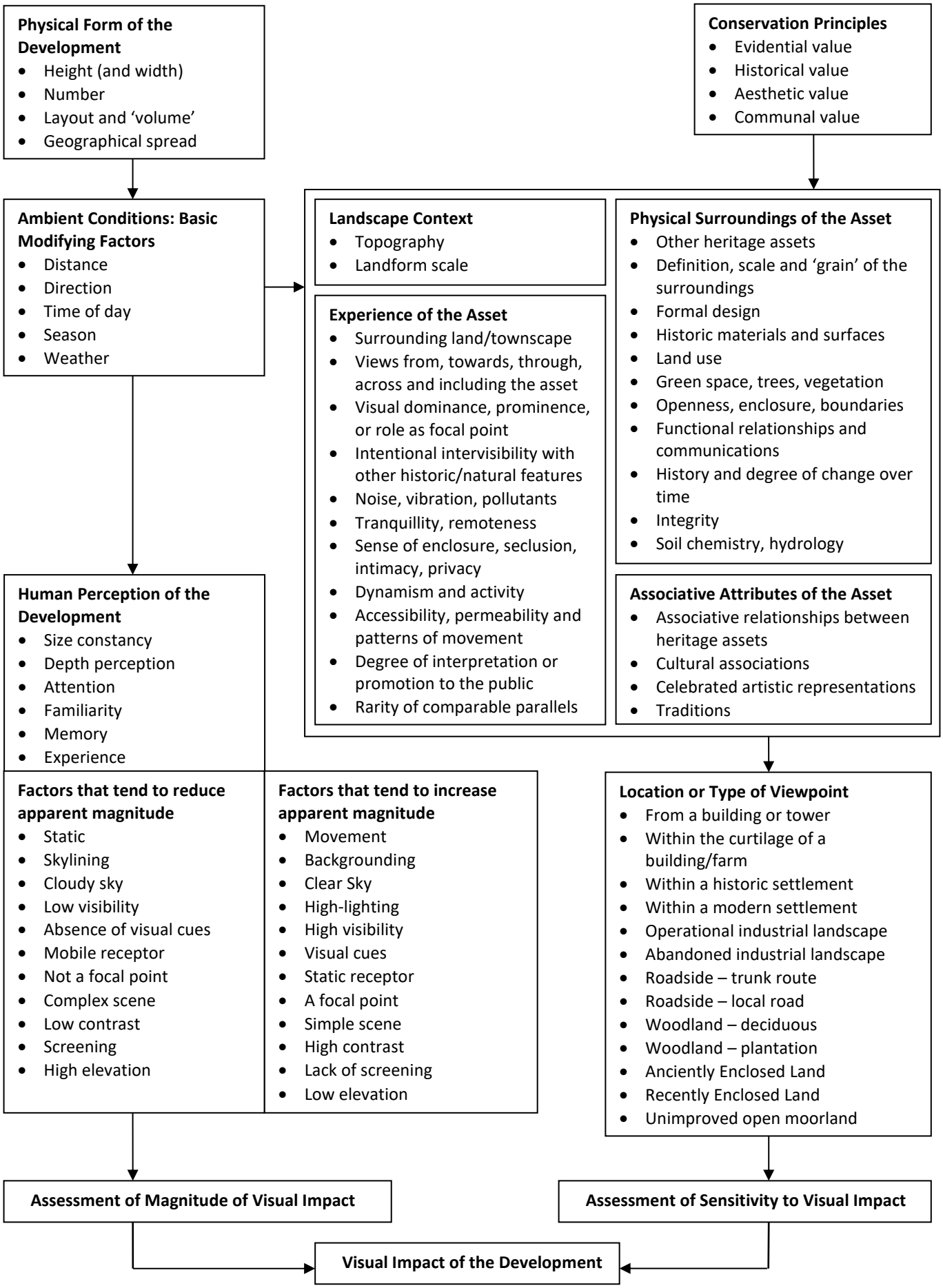


TABLE 8: THE CONCEPTUAL MODEL FOR VISUAL IMPACT ASSESSMENT PROPOSED BY THE UNIVERSITY OF NEWCASTLE (2002, 63), MODIFIED TO INCLUDE ELEMENTS OF *ASSESSMENT STEP 2* FROM THE SETTING OF HERITAGE ASSETS (HISTORIC ENGLAND 2015, 9).

APPENDIX 2: PHOTOGRAPHIC ARCHIVE

WALKOVER

1. VIEW FROM THE FORMER CHELFHAM MILL SCHOOL SITE AND ROAD INTO BARNSTAPLE; VIEWED FROM THE NNE.

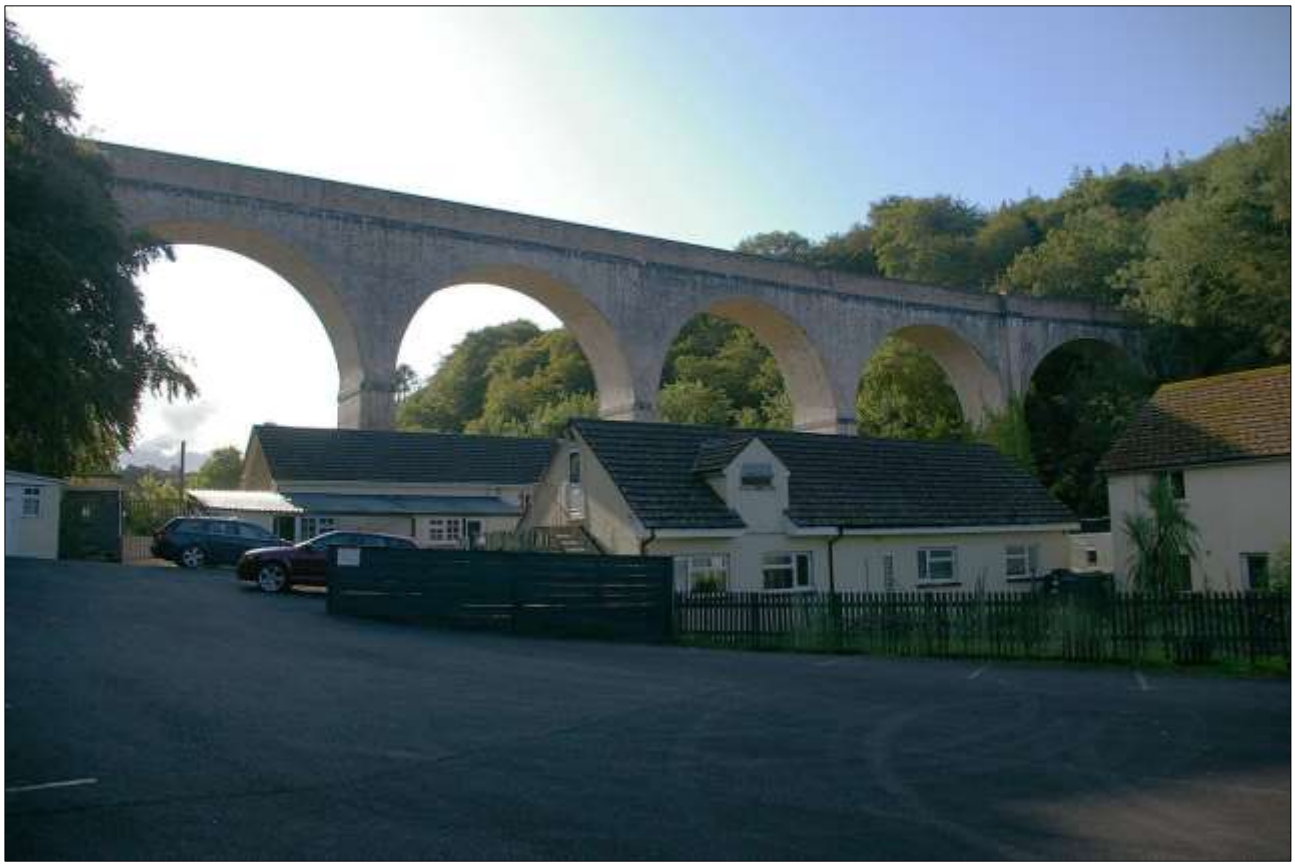
2. VIEW OF THE SITE AND THE ROAD JUNCTION TO STOKE RIVERS; VIEWED FROM THE NORTH.

3. VALLEY VIEW OF THE SITE AND THE VIADUCT; VIEWED FROM THE NNW.

4. VIEW OF THE SITE FROM THE ENTRANCE GATEWAY, BLOCKS 2 AND 3 WITH THE GARDENS BEYOND; VIEWED FROM THE NORTH-EAST.

5. VIEW OF THE WESTERN BOUNDARY OF THE SITE FLANKING THE ROAD; VIEWED FROM THE NORTH-EAST.

6. DETAILED VIEW OF THE CURVING SLATESTONE RUBBLE PERIMETER WALL THAT ENCLOSED THE FORMER GARDENS; VIEWED FROM THE EAST.



7. PROFILE OF THE VIADUCT WITHIN THE SITE, DEMONSTRATING ITS VISUAL DOMINANCE; VIEWED FROM THE WNW.

8. BLOCK 1 WITH THE VIADUCT BEHIND; VIEWED FROM THE NORTH-WEST.

9. BLOCK 1 (1B IN THE FOREGROUND, 1A IN THE BACKGROUND); VIEWED FROM THE NNW.

10. DETAIL OF THE BRICK ARCHES IN BLOCK 1A; VIEWED FROM THE WSW.

11. THE REAR ELEVATION OF BLOCK 1, SHOWING THE CLOSE PROXIMITY TO THE VIADUCT; VIEWED FROM THE SOUTH-EAST.

12. VIEW UP AND ALONG BLOCK 1, WITH THE SHEDS UNDER THE ARCHES BEHIND; VIEWED FROM THE SOUTH.

13. THE COVERED PLAY AREA UNDER BLOCK 1B TO THE REAR; VIEWED FROM THE SSE.

14. VIEW ALONG THE REAR SIDE OF BLOCK 1; VIEWED FROM THE NORTH.

15. THE LARGE LIVING SPACE AT THE SOUTH END OF BLOCK 1, WITHIN 1A, WHERE THERE IS A BLOCKED FIREPLACE IN THE WALL, SHOWING THE MODERNISED CHARACTER; VIEWED FROM THE SOUTH-WEST.

16. A LARGE GROUND FLOOR LIVING ROOM IN THE NORTH OF BLOCK 1B; VIEWED FROM THE SOUTH-WEST.

17. FIRST FLOOR CORRIDOR ALONG THE COMBINED FIRST FLOOR OF BLOCK 1; VIEWED FROM THE SOUTH.

18. ONE OF THE MODERN BATHROOMS IN BLOCK 1; VIEWED FROM THE WEST.

19. ONE OF THE SMALL PRIVATE RESIDENTIAL BEDROOMS WITHIN BLOCK 1, SHOWING A COMPLETE REORGANISATION OF THE SPACE AT THIS LEVEL; VIEWED FROM THE WEST.

20. THE NORTH ELEVATIONS OF BLOCK 2 AND 3 BEHIND; VIEWED FROM THE NNE.

21. THE INTERIOR OF ONE OF THE SCIENCE CLASSROOMS IN BLOCK 2; VIEWED FROM THE ENE.

22. THE EAST AND SOUTH ELEVATIONS OF BLOCK 3 (BLOCK 3A TO THE EAST END, BLOCK 3B TO THE WEST END AND A MODERN PURPOSE-BUILT SCHOOL RANGE); VIEWED FROM THE ESE.

23. BLOCK 3 (3B TO THE FOREGROUND), SHOWING THE GROUND FLOOR CLASSROOMS WITH FIRST FLOOR OFFICES; VIEWED FROM THE SOUTHWEST.

24. BLOCK 3 FROM ABOVE; VIEWED FROM THE SOUTH-WEST.

25. THE SETTING OF BLOCK 3, WITH THE RIVER AND THE HOUSE (BLOCK 7A) TO THE WEST; VIEWED FROM THE SOUTH-WEST.

26. ONE OF THE GROUND FLOOR CLASSROOMS IN BLOCK 3; VIEWED FROM THE SSW.

27. ONE OF THE GROUND FLOOR CLASSROOMS IN BLOCK 3; FROM THE SOUTH EAST.

28. THE FIRST FLOOR CENTRAL SPINE CORRIDOR IN BLOCK 3; VIEWED FROM THE EAST.

29. ONE OF THE SMALL FIRST FLOOR CLASSROOMS IN BLOCK 3; VIEWED FROM THE NORTH-EAST.

30. BLOCK 4, WITH BLOCK 4A TO THE WEST AND BLOCK 4B (THE EXTENSION) TO THE EAST; VIEWED FROM THE NORTH.

31. THE SETTING OF BLOCK 4 WITH THE VIADUCT BEHIND; VIEWED FROM THE WNW.

32. VIEW OF THE CANALISED RIVER RUNNING PAST BLOCK 4; VIEWED FROM ABOVE.

33. BLOCK 4 FROM THE SOUTH, SHOWING A TALL STAIR WINDOW FORCED INTO THE WALL OF BLOCK 4A; VIEWED FROM THE SOUTH.

34. BLOCK 4B WITH STEPS TO LOFT; VIEWED FROM THE ESE.

35. THE WIDER SETTING OF BLOCK 4 WITHIN THE SITE, SHOWING THE PHYSICAL DOMINANCE OF THE VIADUCT; VIEWED FROM THE SOUTH-WEST.

36. THE BLOCKED DOORWAY IN THE EAST WALL OF BLOCK 4A, ON THE GROUND FLOOR; VIEWED FROM THE WEST.

37. VIEW ACROSS THE MODERNISED SCIENCE LAB IN BLOCK 4A, SHOWING THE BOXED-IN BEAMS; VIEWED FROM THE NORTH-EAST.

38. THE LOFT IN BLOCK 4B; VIEWED FROM THE NORTH-WEST

39. THE LOFT IN BLOCK 4B; VIEWED FROM THE SOUTH-WEST.

40. THE STAIRS FORCED INTO BLOCK 4A AT ITS SOUTHERN END, LIT BY A TALL WINDOW; VIEWED FROM THE EAST.

41. THE TWO A-FRAME TRUSSES OVER BLOCK 4A; VIEWED FROM THE NORTH-WEST.

42. PEGS IN THE OVERLAPPING RIDGE OF THE A-FRAME TRUSSES IN BLOCK 4A; VIEWED FROM THE SOUTH.

43. BLOCK 5, WITH THE RIVER RUNNING PAST, VIEWED FROM UNDER THE VIADUCT; VIEWED FROM THE NORTH.

44. THE RIVER WHERE IT RUNS BENEATH THE PIERS OF THE VIADUCT; VIEWED FROM THE WEST.

45. THE INTERIOR OF BLOCK 5, A FORMER MUSIC CLASSROOM; VIEWED FROM THE WEST.

46. THE SLUICE GATES JUST EAST OF THE VIADUCT; VIEWED FROM THE NORTH.

47. THE RIVER TO THE WEST OF THE SITE, WHERE IT RUNS UNDER THE ROAD AND A MODERN FOOTBRIDGE; VIEWED FROM THE SOUTH-EAST.

48. THE SITE AND RIVERBANK; VIEWED FROM THE SOUTH WEST.

49. THE BRIDGE WHICH CARRIES THE ROAD OVER RIVER, SHOWING HOW THE BANK HAS SLUMPED ON THE NORTH SIDE, BLOCKING THE SECOND ARCH; FROM THE EAST.

50. VIEW OF THE SITE FROM THE RIVERBANK; VIEWED FROM THE SWS.

51. THE WALLS, WHEEL PIT AND WATERWHEEL TO THE EAST OF BLOCK 6; VIEWED FROM THE NORTH-WEST.

52. THE SILTED-UP LEAT LEADING TO THE OVERSHOT WATERWHEEL, JUST SOUTH-EAST OF BLOCK 6; VIEWED FROM THE WEST.

53. BLOCK 6, TERRACED INTO THE BANK WITH THE LEAT IN THE FOREGROUND; VIEWED FROM THE EAST.

54. THE GROUND FLOOR INTERIOR OF THE MILL; VIEWED FROM THE SOUTH-EAST CORNER.

55. BLOCKED OPENING OR FIREPLACE IN THE WEST WALL OF THE MILL; VIEWED FROM THE EAST.

56. BEAMS ON THE INTERIOR OF THE EAST WALL BRACING THE WATERWHEEL ON THE EXTERIOR OF BLOCK 6; VIEWED FROM THE WNW.

57. THE SMALL KITCHEN IN THE REAR OF THE OF THE GROUND FLOOR OF THE MILL; VIEWED FROM THE NORTH-WEST.

58. THE FORCED DOORWAY IN THE FIRST-FLOOR WEST WALL OF THE MILL THAT PROVIDES ACCESS TO BLOCK 7B; VIEWED FROM THE WEST.

59. ONE OF THE SMALL ROOMS AND BATHROOMS ON THE FIRST FLOOR OF THE MILL, WHICH HAS BEEN DIVIDED UP FOR STAFF ACCOMMODATIONS; VIEWED FROM THE NORTH-EAST.

60. THE LOFT IN THE MILL; VIEWED FROM THE NORTH-EAST.

61. VIEW OF THE ROOF OF THE MILL, BLOCK 6; VIEWED FROM THE WEST.

62. THE VIEW OF THE MILL (BLOCK 6), THE LINKING STRUCTURE (BLOCK 7B) AND THE GENTRY RESIDENCE (BLOCK 7A); VIEWED FROM THE NORTH.

63. BLOCK 7A, THE HOUSE, VIEWED FROM ACROSS THE FOOTBRIDGE (THE OLD BRIDGE WAS WASHED AWAY BY FLOODS); VIEWED FROM THE NNW.

64. BLOCK 7A; VIEWED FROM THE WEST.

65. THE WHOLE SITE; VIEWED FROM THE SOUTH WEST.

66. THE EAST WALL OF BLOCK 7A AT FIRST FLOOR AND ATTIC LEVEL, WHICH ARE NOT OBSCURED BY ADJOINING STRUCTURES; VIEWED FROM THE SOUTH-EAST.

67. THE NORTH ELEVATION OF THE SERVICE RANGE AT FIRST FLOOR LEVEL; VIEWED FROM THE NORTH.

68. THE MAIN ENTRANCE HALL OF BLOCK 7A; VIEWED FROM THE WEST.

69. VIEW FROM THE FROM THE FORMER ARCHED FRONT DOORWAY (NOW OBSCURED BY A SMALL MODERN SECURITY PORCH); VIEWED FROM THE EAST.

70. ONE OF THE MAIN RECEPTION ROOMS OF BLOCK 7A, SHOWING AN ALTERED ART DECO FIREPLACE AND LARGE WINDOW (PVC FRAMES); VIEWED FROM THE SOUTH-EAST.

71. THE SMALL FORCED DOORWAY AND LARGER ORIGINAL DOORWAY INTO THIS ROOM; VIEWED FROM THE NORTH-WEST.

72. THE LARGE (BLOCKED) CHIMNEY BREAST IN THE LIBRARY, THE SECOND OF THE LARGE RECEPTION ROOMS; VIEWED FROM THE NORTH-EAST.

73. THE LARGE ALTERED WINDOW IN THIS ROOM; VIEWED FROM THE SOUTH-EAST.

74. LEFT: THE FINE PLASTER CORNICE WHICH SURVIVES IN THIS FRONT FORMER RECEPTION ROOM; VIEWED FROM THE SOUTH.

75. RIGHT: THE NURSES STATION TO THE REAR OF THE HOUSE, CONVERTED FOR SCHOOL USE; VIEWED FROM THE SOUTH.

76. THE BLOCKED DOORWAY BETWEEN THE MILL BUILDING AND SERVICE RANGE; VIEWED FROM THE WEST.

77. THE LARGE GROUND-FLOOR ROOM TO THE EAST OF THE SERVICE RANGE; THE WINDOWS AND FIREPLACE ARE NOW BLOCKED; VIEWED FROM THE NORTH-WEST.

78. THE LARGE MODERN KITCHENS IN BLOCK 7A; VIEWED FROM THE EAST.

79. DETAIL OF THE SURVIVING SKIRTING BOARDS/STAIR PLATES WITHIN THE ALTERED STAIR AREA IN BLOCK 7A; VIEWED FROM THE NORTH.

80. THE STAIR WINDOW TO BLOCK 7A; VIEWED FROM THE NORTH.

81. ONE OF THE LARGE FIRST-FLOOR BEDROOMS IN BLOCK 7A, WITH BLOCKED WINDOW AND FITMENTS FOR A DORMITORY; VIEWED FROM THE NORTH-EAST.

82. ONE OF THE LARGE FRONT WINDOWS ON THE FIRST FLOOR IN BLOCK 7A SHOWING PANELLED SHUTTERS; VIEWED FROM THE SOUTH-EAST.

83. ONE OF THE OTHER LARGE FIRST-FLOOR BEDROOMS IN BLOCK 7A; VIEWED FROM THE ENE.

84. ONE OF THE HISTORIC CAST IRON RADIATORS IN BLOCK 7A; VIEWED FROM THE NNE.

85. THE BEADED AND MOULDED CEILING BEAMS IN THE FIRST FLOOR OF THE SERVICE RANGE; VIEWED FROM THE WEST.

86. THE WINDOW AT THE TOP OF THE STAIR, CUT BY AN INSERTED HALF-LANDING IN BLOCK 7A; VIEWED FROM THE WSW.

87. LEFT: ONE OF THE BATHROOMS FOR STAFF INSERTED INTO THE ATTIC; VIEWED FROM THE NORTH-WEST.

88. RIGHT: ONE OF THE ATTIC BEDROOMS IN BLOCK 7A, SHOWING THE DAMAGE FROM WATER INGRESS; VIEWED FROM THE NNE.

89. THE LARGE MODERN SPACE ON THE GROUND FLOOR CREATED BY INFILLING THE SPACE BETWEEN BLOCK 6 AND BLOCK 7A; VIEWED FROM THE EAST.

90. THE ODD ANGLES AND LINKING SPACES FORMED BY JOINING THE RANGES TOGETHER; VIEWED FROM THE WSW.

91. ONE OF THE SMALL PURPOSE-BUILT STAFF BEDROOMS IN THE FIRST FLOOR SECTION OF BLOCK 7B; VIEWED FROM THE SOUTH.

92. THE LARGE EASTERN GARDEN FIELD AREA, SHOWING THE VARIOUS STATIC CARAVANS AND SHEDS SET UNDER THE VIADUCT; VIEWED FROM THE SOUTH.

93. THE INTERIOR OF THE MODERN SCHOOL HALL, BLOCK 8; VIEWED FROM THE SOUTH.

94. THE TERRACED GARDENS AND HISTORIC ORCHARD ON THE LOWER HILLSIDE SOUTH-WEST OF THE SITE; VIEWED FROM THE NORTH.

95. THE HISTORIC DRIVE FROM THE HOUSE TO THE MAIN ROAD; VIEWED FROM THE EAST.

96. VIEW SOUTH AND WEST ALONG THE WOODED VALLEY OF THE RIVER YEO; VIEWED FROM THE EAST.

97. VIEW OF CURVING BOUNDARY WALL TO THE WEST OF THE SITE; VIEWED FROM THE SOUTH-EAST.

98. VIEW NORTH ALONG THE VALLEY OF THE RIVER YEO, SHOWING THE VALLEY AND WOODED SETTING OF SITE; VIEWED FROM THE SSE.

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