Heritage Asset Review

Final Report

On behalf of:

Epping Forest District Council

Original Submission Date: 23 May 2012

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1.0 Introduction

1.1 This report is prepared by DPP Heritage & Design to set out the findings of the Heritage Asset Review (HAR) undertaken on behalf of Epping Forest District Council (Epping Forest DC).

1.2 In preparing this report our remit was to undertake a high level review the condition and appropriateness of existing conservation areas and locally listed buildings and whether there are any other potential areas or buildings which could merit further consideration. As part of the suggestions set out in this report the conclusion will also identify those areas or building types which could warrant further investigation. In addition the process has brought to light those buildings or structures which could warrant addition to the statutory list of buildings of special architectural or historic interest. These buildings/structures have been identified and noted in the analysis for further consideration by Epping Forest DC.

1.3 This report complies with the requirements set out in the Invitation to Tender issued by Epping Forest District Council and is the end product of a thorough and intensive review of the whole District as well as a process of engagement with relevant stakeholders. This report builds upon the Stage 1 Report (Planning the Review) and Stage 7 Interim Report which have previously been submitted to Epping Forest DC.

1.4 The structure of this report is as follows:

1. Executive Summary (under separate cover);
2. Introduction;
3. A discussion of the documentary research undertaken together with a list of resources consulted and a note of any conservation area or locally listed buildings which have a large documentary evidence base (Phase 2 of the Project Brief);
4. An outline of the survey process noting the general trends that emerged from this phase of work as well as observations gained from the in depth site surveys. This section cross references the completed and formatted record sheets for both conservation areas and locally listed buildings and the photographic index sheets (Phase 3 of the Project Brief);
5. A discussion of the stakeholder engagement process including a list of all those consulted, a summary of the relevant responses and our analysis as well as an assessment of the engagement process itself. The consultation responses are treated as confidential and are included as a separate enclosure, however, appropriate cross references is made to the summaries of these responses which are included as an Appendix (Stage 4 of the Project Brief); and

6. Summary of findings relating to conservation areas in the District;

7. Summary of findings relating locally listed buildings in the District; and

8. Recommendations
2.0 Documentary Research

Methodology

2.1 The desk based assessment was a targeted exercise to identify the significance of the existing conservation areas and locally listed buildings. The exercise also allowed the identification of other buildings and sites which could warrant designation. In order to validate this documentary resource, all the potential additions to the local list or areas that may warrant designation as conservation areas were investigated as part of the site survey process. This was an iterative process which allowed sufficient flexibility to research potential heritage assets identified as part of the site surveys in a responsive manner.

2.2 The research programme identified sources of information available and allowed targeted analysis of these sources to identify the significance of both existing and potential heritage assets. In addition this process has identified and noted potential archive sources for heritage assets to be identified for further research if required in the future.

2.3 The following general documentary sources are applicable to the District as a whole and were a key element of the research process:

- The Essex Historic Environment Record (HER) entries made available through the Heritage Gateway website -
http://www.heritagegateway.org.uk/Gateway/Results_Application.aspx?resourceID=1001 [Accessed 11/04/2012] (it is possible to search all recorded entries within Epping Forest DC);

- The relevant online documentary sources for Epping Forest DC are available on British History online: http://www.british-history.ac.uk/search.aspx?query=Epping [Accessed 17/04/2012];

- Adopted and draft Conservation Area Appraisals prepared by Epping Forest District Council;

- Heritage Asset descriptions – statutory and local list, registered park and gardens, scheduled monuments and 'Conservation Areas at Risk' register;

- The first epoch OS maps for each conservation area; and

- Feedback provided by stakeholders.

**Discussion of Sources**

2.4 The Victoria County History (VCH) series is an invaluable resource in providing a snapshot of large areas of the district at the time of writing. The relevant volumes for the Epping Forest DC area are, however, of some age dating from between 105 and 29 years old. In some instances quite significant changes have occurred since the relevant volume was first published and in a number of cases, particularly in rural areas, a number of potential candidates for designation have been demolished or so altered as to render them void of heritage significance.

2.5 The relevant Pevsner volume provides helpful background on the historic settlements and more significant isolated rural buildings. Given the wealth of historic buildings in Essex, the Pevsner volume restricted its content to the most important significant and interesting areas at the expense of detailed commentary on vernacular buildings/areas or 19th century and later buildings. Despite these limitations it provides helpful background on those conservation areas which are focussed on rural settlements and a small number of unlisted buildings of note.

2.6 In terms of providing a thorough District wide coverage of heritage assets the data held in the Essex HER is probably the most significant. The majority of the entries are up to date and include both designated and undesignated assets and span all asset types. The HER data is useful in corroborating the evidence contained within other resources such as the VCH volumes as well as providing expert assessments on
undesignated heritage assets. It should be noted that a sizeable amount of the HER data relates to 'preservation by record' for buildings/sites that have been demolished/redeveloped and, whilst an irreplaceable record, is of limited assistance in the HAR process.

2.7 The Essex HER is of particular importance in the impressive record of military remains within the District, some of which are noted as being of local and potentially national significance. Whilst many of these sites have been lost or in such a parlous condition as to remove their heritage significance, the HER data provides a comprehensive data set which describes in detail the history, significance and condition of these structures/sites and sets them within a wider regional and national context. This has been of particular assistance, for instance, in defining the significance of large dispersed sites such as North Weald Airfield which have been subject to significant change.

2.8 The existing documentary sources prepared by Epping Forest DC and other regulatory bodies such as English Heritage are useful in supporting the findings arising from the wider documentary research as well as defining the significance of existing conservation areas and locally listed buildings. These sources are also helpful in a number of instances in identifying potential alterations to existing designations as well as those designations which are facing particular pressures.

2.9 Of particular assistance in targeting site surveys and research are the first epoch OS maps dating from the early/mid-19th century onwards. Whilst there are earlier map series available the first epoch OS maps are generally superior in terms of accuracy and detail and provide evidence of settlements prior to rapid 19th century expansion and urbanisation, allowing the historic pattern of development to be readily understood as well as identifying vernacular structures which are potentially of historic interest. This map series was used primarily as a means of identifying those areas which may be worthy of inclusion within existing conservation areas.

Further Research

2.10 The majority of historic settlements within the District will have additional documentary and cartographic sources located in the Epping District Museum, the Essex Historic Environment Record (HER) and Essex Records Office. The Essex HER
contains a detailed archaeological database which can, potentially, assist in establishing the early origins of settlements and their historic development in a manner that compliments other documentary sources.

2.11 For those towns with remains of national significance the National Monuments Record (NMR) (operated by English Heritage) will normally have a collection of material including historic photographs, drawings/paintings, antiquarian descriptions and archaeological investigations. This could be particularly valuable resources for conservation areas such as Waltham Abbey and Chipping Ongar.

2.12 The District contains a significant collection of military buildings and sites ranging in date from the late 19th century through to the Cold War era (1950s-70s). English Heritage undertook a thematic survey of these sites in the late 1990s/early 2000s known as the 'Monuments of War' programme. From this survey there were subsequent surveys which are relevant to monument types in the District, specifically Matching and North Weald Airfield and the military buildings at Willingale. These sources include:

- the 'Defence of Britain Project' (2002) the findings of which can be downloaded via: [http://www.britarch.ac.uk/cba/projects/dob](http://www.britarch.ac.uk/cba/projects/dob) which provides an inventory of military sites in England; and
- *Cold War; Building for Nuclear Confrontation, 1946-89* with detailed site surveys available from the NMR;
- *Twentieth-Century Military Sites* (2003) which provides helpful background and context to these sites;
- *Historic Military Aviation Sites conservation management guidance* (2003) which specifically notes that North Weald Airfield is a 'key site';
- *North Weald, Essex, Victorian mobilisation centre* (2000) an analytical survey by the English Heritage Research Department (or its predecessors) – typeset available at the NMR; and
- The National Archives at Kew and the British Library also contain extensive military records, aerial photographs and site plans which
were formerly classified which can provide detailed information on the evolution and history of these military sites.
3.0 Survey Process

Overview

3.1 As outlined in the Stage 1 report, the site survey process has been the most intensive phase of work of the HAR taking four working weeks to complete a survey of the entire District. All existing locally listed buildings and conservation areas were surveyed and survey sheets completed using the templates provided by the Council as part of the Invitation to Tender document. An accompanying comprehensive photographic record has also been prepared in line with the project brief. This is provided electronically at Appendices 1 & 2.

3.2 In order to undertake the HAR as efficiently as possible a sequential approach was adopted. This approach was based on the geographical location of the heritage assets within the District. The review was orientated around settlement as this allowed us to undertake reviews of nearby buildings of local interest or those en route between settlements.

3.3 During the site survey phase suggestions for designation arising from the engagement process (those that were received prior to the end of the agreed survey period) were also reviewed. As noted the survey process was iterative and worked in conjunction with the desk based research. This ensured that the survey process was as comprehensive as possible given the project programme.

3.4 All photos are in a high resolution digital format (JPEGs) which ensures that important detailing is discernible.

Unique Reference Identification System

3.5 In order to make the findings of this review as easy to use as possible a unique reference numbering system was devised and agreed with the Project Manager for both conservation areas and locally listed buildings.
Conservation Areas

3.6 The approach adopted for conservation areas in the District is to provide an abbreviation of the name of each. This then allows the reference to be adapted to provide a system for annotating the photographic record and survey sheets that is internally consistent, logical and cross-referenced throughout the survey.

3.7 For instance the photographic record for the Abbess Roding conservation area consists of 65 photographs which are labelled AR-01 to AR-65. These in turn relate to two survey sheets (S) which are labelled ARS01 and ARS02. Table 3.1 below provides a list of the abbreviation used for each existing and suggested conservation area.
### Conservation Area Abbreviations

<table>
<thead>
<tr>
<th>Conservation Area</th>
<th>Abbreviations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abbess Roding</td>
<td>AR</td>
</tr>
<tr>
<td>Abridge</td>
<td>AB</td>
</tr>
<tr>
<td>Baldwins Hill, Loughton</td>
<td>BA</td>
</tr>
<tr>
<td>Bell Common, Epping</td>
<td>BC</td>
</tr>
<tr>
<td>Blake Hall</td>
<td>BH</td>
</tr>
<tr>
<td>Chigwell Village</td>
<td>CV</td>
</tr>
<tr>
<td>Chipping Ongar</td>
<td>CO</td>
</tr>
<tr>
<td>Coopersale Street</td>
<td>CS</td>
</tr>
<tr>
<td>Copped Hall</td>
<td>CH</td>
</tr>
<tr>
<td>Epping</td>
<td>EP</td>
</tr>
<tr>
<td>Great Stony Park, Chipping Ongar</td>
<td>GSP</td>
</tr>
<tr>
<td>High Ongar</td>
<td>HO</td>
</tr>
<tr>
<td>Hill Hall</td>
<td>HH</td>
</tr>
<tr>
<td>Lower Sheering</td>
<td>LS</td>
</tr>
<tr>
<td>Matching</td>
<td>M</td>
</tr>
<tr>
<td>Matching Green</td>
<td>MG</td>
</tr>
<tr>
<td>Matching Tye</td>
<td>MT</td>
</tr>
<tr>
<td>Moreton</td>
<td>MR</td>
</tr>
<tr>
<td>Nazeing and South Roydon</td>
<td>NSR</td>
</tr>
<tr>
<td>Royal Gunpowder Factory</td>
<td>RGF</td>
</tr>
<tr>
<td>Roydon</td>
<td>R</td>
</tr>
<tr>
<td>Staples Road</td>
<td>SR</td>
</tr>
<tr>
<td>Upshire</td>
<td>UP</td>
</tr>
<tr>
<td>Waltham Abbey</td>
<td>WA</td>
</tr>
<tr>
<td>York Hill, Loughton</td>
<td>YH</td>
</tr>
<tr>
<td>St John's, Buckhurst Hill*</td>
<td>SJBH</td>
</tr>
<tr>
<td>Theydon Bois*</td>
<td>TB</td>
</tr>
</tbody>
</table>

* Suggested Conservation Areas

#### Table 3.1 – Abbreviations: Conservation Areas

#### Locally Listed Buildings

3.8 As the survey organises locally listed buildings (as well as suggested additions to the list) on a Parish by Parish basis we have adopted an approach where each building is identified by an abbreviation of the Parish name and number followed by 'E' for existing entry or 'P' for a proposed addition to the local list. For instance St Stephen's Church in Buckhurst Hill Parish (currently no.1 on the local list for that Parish) would be 'BH-E01'. The Old School House in Nazeing (currently the fifth entry in that Parish's local list) would be 'N-E05'. For suggested additions to the local list the system is flexible and would continue the numbering system from where the existing
list ends. For instance, the Norwegian War Memorial in North Weald would become 'NW-P10'. This system allows the local list to be expanded and updated as necessary, for instance, if further buildings are considered for local listing in the future.

3.9 This unique reference number is then, in turn, used to identify corresponding photographs. For example St Stephen’s Church in Buckhurst Hill has 6 photos which are labelled BH-E01_01, BH-E01_02 etc. whereas the photographs of the Norwegian War Memorial are NW-P10_01 & NW-P10_2. This system is sufficiently flexible to allow photographs of buildings to be added or removed in the future.

3.10 This numbering system is cross-referenced in all relevant parts of the report, including:

- The photographic record; and
- Locally listed buildings survey sheets.

3.11 The full list of Parish abbreviations, for those Parishes with existing or suggested locally listed buildings, is set out below in Table 3.2:
<table>
<thead>
<tr>
<th>Parish</th>
<th>Abbreviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abbess, Beauchamp and Berners Roding Parish</td>
<td>ABBR</td>
</tr>
<tr>
<td>Bobbingworth Parish</td>
<td>B</td>
</tr>
<tr>
<td>Buckhurst Hill Parish</td>
<td>BH</td>
</tr>
<tr>
<td>Chigwell Parish</td>
<td>C</td>
</tr>
<tr>
<td>Epping Parish</td>
<td>E</td>
</tr>
<tr>
<td>Epping Upland Parish</td>
<td>EU</td>
</tr>
<tr>
<td>Fyfield Parish</td>
<td>F</td>
</tr>
<tr>
<td>High Laver Parish</td>
<td>HL</td>
</tr>
<tr>
<td>High Ongar Parish</td>
<td>HO</td>
</tr>
<tr>
<td>Lambourne Parish</td>
<td>L</td>
</tr>
<tr>
<td>Little Laver Parish</td>
<td>LL</td>
</tr>
<tr>
<td>Loughton Parish</td>
<td>LO</td>
</tr>
<tr>
<td>Magdalen Laver Parish</td>
<td>ML</td>
</tr>
<tr>
<td>Matching Parish</td>
<td>M</td>
</tr>
<tr>
<td>Moreton Parish</td>
<td>MO</td>
</tr>
<tr>
<td>Nazeing Parish</td>
<td>N</td>
</tr>
<tr>
<td>North Weald Parish</td>
<td>NW</td>
</tr>
<tr>
<td>Ongar Parish</td>
<td>O</td>
</tr>
<tr>
<td>Roydon Parish</td>
<td>R</td>
</tr>
<tr>
<td>Sheering Parish</td>
<td>S</td>
</tr>
<tr>
<td>Stanford Rivers Parish</td>
<td>SR</td>
</tr>
<tr>
<td>Stapleford Abbots Parish</td>
<td>SA</td>
</tr>
<tr>
<td>Theydon Bois Parish</td>
<td>TB</td>
</tr>
<tr>
<td>Waltham Abbey Parish</td>
<td>WA</td>
</tr>
<tr>
<td>Willingale Parish</td>
<td>W</td>
</tr>
</tbody>
</table>

Table 3.2 – Abbreviations: Locally Listed Buildings

Survey Process

Conservation Areas

3.12 The conservation area surveys were, generally, more straightforward than those of the locally listed buildings as most were undertaken from the public realm. Where entry proved more complicated, for instance with private estates, access was normally arranged via the project manager. A common problem for both conservation area and local list surveys was lack of access to individual properties which in some instances precluded a detailed photographic record.
3.13 The completed conservation area photographic survey including survey forms and photographic index are provided at Appendix 1 (please note that the photographic survey & survey sheets are provided in electronic format only) and form part of Appendix 10 which includes all the survey data for the existing conservation areas.

Locally Listed Buildings

3.14 The survey process has been successfully completed as per the requirements of the tender. One practical consideration raised during discussions with the project manager was the potential for difficulty in obtaining access to the non-public elevations of locally listed building either as a result of being denied access by owners/occupiers or the lack of occupation at the time of survey.

3.15 Accordingly a protocol was agreed with the project manager whereby every reasonable effort was taken to record all elevations of locally listed buildings. In those instances where full access was not possible only those elevations which were visible available from the public realm were recorded. It should be noted that in most instances it is the public elevations which are of primary significance to the locally listed buildings. The photographic record therefore provides a thorough baseline upon which the Council can effectively manage change of these heritage assets.

3.16 It should be noted that the identification of mile and boundary stones proved to be particularly problematic as the descriptions were often not specific. To assist in the use of the local list it may be worth including a grid reference for each of these asset types. This will allow rapid re-survey of these assets should the need arise and allow for effective management.

3.17 The completed photographic survey, including survey sheets of the existing locally listed buildings and photographic index are provided at Appendix 2 (please note that the photographic record and survey sheets are provided in electronic format only).
4.0 Stakeholder Engagement

4.1 DPP Heritage and Design worked closely with officers of Epping Forest DC to prepare the engagement website and questionnaires.

4.2 The stakeholder engagement website went 'live' on 11/04/2012 and closed on the 27/04/2012. A total of 96 stakeholders were consulted through the website, emailed questionnaires and telephone (Appendix 3 contains a list of all stakeholders contacted). In total there were 57 completed responses to the engagement process, split on the following basis:

- Conservation areas: 34 responses
- Local list: 23 responses

4.3 It should be noted that there is some overlap on these figures in that some respondents completed both the conservation area and local list questionnaires. Notwithstanding this caveat this is a response rate of c.36% which is significantly higher than the 10% normally expected for questionnaires.

4.4 On the basis of feedback received from Town & Parish Councils it was decided to provide hard copies of the questionnaire via email to facilitate feedback and engagement with the process. This supplemented the website process which ran concurrently. Those stakeholders who did not have an email address available were contacted by phone for their views.

4.5 The majority of responses received came from local bodies, particularly Town & Parish Councils, local residents’ groups and interest groups such as local history societies. There was a limited response from adjoining authorities or statutory bodies such as English Heritage.

4.6 The responses to the survey were varied and Appendix 4 provides a summary of the responses received and our commentary on the issues raised. It will be seen in Appendix 4 that there were a number of detailed responses from stakeholders in the Loughton area reiterating similar issues. These have been considered in detail as part of the analysis in Sections 5.0 and 6.0 of this report.
4.7 The consultation responses themselves have been treated as confidential and are provided under separate enclosure (electronic copy) for Council records only. These responses do not form part of this report.
5.0 Summary of Findings – Conservation Areas

5.1 In general the HAR process has found that the heritage of the District is well protected. The existing conservation area boundaries are, for the most part, robust and coherent and protect those elements which are of heritage significance.

General Findings

5.2 The results of the survey show that the majority of the existing conservation areas do not require any substantial amendments to current boundaries. In our view only minor amendments are required to rationalise designations, to include buildings which are of a comparable quality to those within the conservation area and to exclude harmful sites/buildings are required. Appendix 5 contains plans outlining the suggested amendments to the existing conservation areas.

5.3 Following the desk based assessment, detailed site surveys and results of the stakeholder engagement; we are suggesting minor boundary changes to the following conservation areas:

<table>
<thead>
<tr>
<th>Conservation Area</th>
<th>Extension?</th>
<th>Reduction?</th>
<th>Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td>ABBR (Abbess Roding)</td>
<td>Yes</td>
<td>-</td>
<td>To include gardens/land which was historically associated with the settlement as shown on the first epoch OS plan.</td>
</tr>
<tr>
<td>AB (Abridge)</td>
<td>-</td>
<td>Yes</td>
<td>Suggested removal of areas of modern housing which do not contribute to the character or appearance of the conservation area.</td>
</tr>
<tr>
<td>BA (Baldwins Hill)</td>
<td>-</td>
<td>Yes</td>
<td>Suggested removal of two areas containing buildings which do not contribute to the character or appearance of the conservation area because of a lack of intrinsic merit or have been so altered as to render them void of interest.</td>
</tr>
</tbody>
</table>
Whilst it is acknowledged that the area to the west of Baldwins Hill does contain a number of traditional buildings the quality is not consistent and has been further undermined by extensive incremental changes such as replacement windows, loss of boundary treatments and the formation of vehicular hardstandings to an extent where they no longer retain the necessary special architectural or historic interest that the remainder of the conservation areas does.

<table>
<thead>
<tr>
<th>BC (Bell Common)</th>
<th>Yes</th>
<th>-</th>
</tr>
</thead>
<tbody>
<tr>
<td>It is suggested that the existing conservation area be extended to the northeast to incorporate a row of good quality late 19th/early 20th century properties. Whilst there are some properties in this group which are not of the same quality their inclusion would not, in itself, undermine the special architectural or historic interest of the conservation area.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>CH (Copped Hall)</th>
<th>Yes</th>
<th>-</th>
</tr>
</thead>
<tbody>
<tr>
<td>It is suggested that the conservation area be extended to the south along Crown Hill to rationalise the existing boundaries and also to include good quality examples of estate architecture which contribute to the historic and architectural interest of the Copped Hall estate.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>EP (Epping)</th>
<th>Yes</th>
<th>-</th>
</tr>
</thead>
<tbody>
<tr>
<td>It is suggested that the boundaries be increased to include a small number of traditional 19th century properties on Lindsey Street to the NW of the conservation area and a collection of late 19th/early 20th century housing which consists of high quality detached houses and superior terraces in the area at the junction of Nicholl, Hartland and</td>
<td></td>
<td></td>
</tr>
<tr>
<td>M (Matching)</td>
<td>Yes</td>
<td>-</td>
</tr>
<tr>
<td>-------------------</td>
<td>-----</td>
<td>---</td>
</tr>
<tr>
<td>MG (Matching Green)</td>
<td>Yes</td>
<td>-</td>
</tr>
<tr>
<td>MT (Matching Tye)</td>
<td>Yes</td>
<td>-</td>
</tr>
<tr>
<td>R (Roydon)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>
At the northernmost part of the conservation area is a 20th century detached garage. As it belongs to a property that lies outside the conservation area boundary, it is suggested that this garage be excluded from the conservation area.

UP (Upshire)  Yes  -  A minor amendment to the existing boundary is suggested to incorporate a residential curtilage associated with The Cottage, Long Street. This amendment rationalises the existing boundary.

WA (Waltham Abbey)  -  Yes  As the river passes under Highbridge Street, the boundary crosses over to the east bank of the river, having previously been on the west bank as it came towards Waltham Abbey. Where the river turns eastward, the boundary stays on the north bank, until the boundary runs south, to include a row of cottages. It is suggested that the boundary stays on the west bank and runs along the south bank instead, heading round the Georgian cottages and excluding the car park and modern doctor’s surgery which do not contribute to the character or appearance of the conservation area.

It is also suggested that the boundary be amended to remove the leisure centre, located to the rear of Thrift Hall, which has one corner in the conservation area.

It is also suggested that the conservation area boundary be amended to exclude the prominent petrol filling station at the junction of Sewardstone &
It is suggested that the boundary be extended to include no. 10 Pump Hill. This is an attractive early 20th century detached house set on a prominent corner plot. It forms an important element in the entrance to the conservation area and warrants inclusion.

Table 5.1 – Suggested Minor Amendments to Existing Conservation Area Boundaries

<table>
<thead>
<tr>
<th>YH (York Hill)</th>
<th>Yes -</th>
<th>-</th>
<th>Farm Hill Road.</th>
</tr>
</thead>
</table>

Suggested Significant Changes to Existing Conservation Areas

5.4 The most substantive suggested change relates to the South Roydon and Nazeing conservation area, which, it is suggested be split into two separate conservation areas, which would be known as the Nazeing conservation area and the South Roydon conservation area.

5.5 The character and appearance of the conservation areas can be summarised as follows:

- Nazeing conservation area: The Nazeing conservation area is one of the largest in the District and covers a wide expanse of historic and attractive countryside between Harlow and Lower Nazeing. It includes: the medieval "long green" settlements of Middle Street and Halls Green; Bumble's Green and the medieval "closed field" system to the north; and the medieval settlements of Nazeing and Broadley Common. The well-preserved medieval settlements and "closed field" patterns are important landscape features that form a fundamental part of the character and appearance of the area. Together with the open or common field systems, these landscape features give each settlement a distinctive setting. Although the field enclosures and patterns are not discernible close to, the area can be clearly distinguished from viewpoints at Nazeing Church and Perry Hill. The area retains its quiet, intimate, small-scale rural qualities characterised by small-grassed fields that are dissected by narrow,
winding lanes and footpaths and bounded by tall hedgerows and mature trees. Nazeing contains the largest number of listed buildings including the magnificent Parish church - the Church of All Saints - in Betts Lane which dates from the 12th century and is listed Grade I; and

- Roydon conservation area: The Roydon conservation area covers a wide expanse of historic and attractive countryside adjoining the dispersed settlement along Epping Road. This dispersed settlement includes a number of historic farmsteads of vernacular character which are set in an attractive rural setting which enhances its aesthetic and historic value. The field patterns are important landscape features that form a fundamental part of the character and appearance of the area and give a distinctive setting. The area retains its quiet, intimate, small-scale rural qualities characterised by small-grassed fields that are dissected by narrow, winding lanes and footpaths and bounded by tall hedgerows and mature trees.

5.6 The suggested boundary would remove the substantial agricultural glasshouses as well as piecemeal infill development which do not contribute to the character or appearance of the area whilst also ensuring that the boundaries are robust and appropriate. A plan outlining this suggested boundary at Appendix 5.

Analysis of Existing Conservation Areas

5.7 The analysis of the existing conservation areas, including summaries of significance, is included at Appendix 6. A summary of the key findings are set out below for ease of reference.

'At Risk Status'

5.8 When taken as a whole the majority of conservation areas in the District are not 'at risk' and their condition and trends are in line with the findings of the 2010 At Risk Survey. However, the Nazeing & South Roydon and Waltham Abbey conservation areas are at risk.

5.9 The threat to the character and appearance of the Nazeing & South Roydon
conservation area lies with the large scale agricultural and industrial development in its setting. The scale and visibility of these structures can have a significant effect on views into and out of the conservation area and are visually incongruous in what is largely a rural landscape framework. The suggested amendments to the boundary of the conservation area will go some way to resolving the harmful effect of these structures upon the integrity of the conservation area, however, there may need to be a more systematic review of how the effect of these types of development are considered as part of the development management process. For instance it may be appropriate to define an area in which Visual Impact Assessments are required in order to establish the scale and magnitude of effect. This could, perhaps, be delivered through the Council's Local Validation requirements.

5.10 The risk to the Waltham Abbey conservation area arises from the condition of the remains of the Abbey which are currently on the national 'Heritage at Risk' register maintained by English Heritage. As a critical element of the conservation area's special interest its 'at risk' status has a significant effect. In addition the current economic conditions mean that there are vacant units in the commercial centre of the conservation area with the consequent risks arising from lack of maintenance etc. Whilst this is likely to be only a temporary situation, if buildings are vacant for a prolonged period there can be significant adverse effects on their intrinsic significance and upon the character and appearance of the conservation area as a whole. The stakeholder feedback suggests that there is a concern locally that enforcement action is not perceived to be applied effectively within the conservation area.

5.11 There is a broader trend within most conservation areas in the District where individual buildings are 'at risk' through vacancy, lack of maintenance and/or inappropriate alterations. The details of these properties are set out in full at Appendix 8, however, it is noted here that there is a concentration of 'buildings at risk' within the following conservation areas:

- Abridge;
- Royal Gunpowder Factory;
- Roydon; and
- Waltham Abbey
Priorities for Conservation Area Appraisals and Management Plans

5.12 As a result of the detailed survey and assessment work it is our view that the following conservation areas should be priorities for the preparation of appraisals and management plans:

- Abridge;
- Chipping Ongar;
- Nazeing & South Roydon;
- Royal Gunpowder Factory;
- Roydon;
- Staples Road, Loughton;
- Waltham Abbey; and
- York Hill, Loughton.

5.13 In considering which areas need to be prioritised we have been mindful of those areas which are considered to be 'at risk' as well as those areas facing particular development pressure e.g. commercial centres where it is important to have robust assessments and management plans in place to exercise development management powers effectively. In addition those areas of denser residential development in Loughton which are subject to incremental change are also a priority in order to establish whether any additional controls over 'permitted development' rights are necessary in order to preserve or enhance the special architectural and historic interest.

Suggested Conservation Area Designations

5.14 In addition it is suggested that two further areas within the District warrant conservation area designation (plans of these suggested conservation areas are included at Appendix 7):

1. Around St John's Church, pond and 'Green' in Buckhurst Hill (SJBH); and
2. Theydon Bois (TB) – including the central 'Green', historic development surrounding it, the Parish church and old school house as well the substantial and high quality Victorian development on
5.15 In order to progress these suggestions to a robust designation a full assessment of their special architectural or historic interest in line with English Heritage best practice would be required.

**Suggested St. John's, Buckhurst Hill Conservation Area**

5.16 The first suggested conservation area is focussed on the 'Green', pond, St. John's Church and school. The landscaped areas contain significant mature trees and attractive soft landscaping and the pond is a focal point for the local townscape. St John's Church is Grade II listed and its associated church yard incorporates attractive mature trees which are a significant and attractive element in the local townscape.

5.17 It is suggested that the enclosing Victorian terraced housing on Osborne Road and the south of Hills Road be included as they create an attractive sense of enclosure to the pond and form part of a coherent townscape that enclose the pond and landscaped 'Green'. Whilst the properties are not of an architectural or historic quality that would warrant conservation area designation in themselves they have been included within the suggested boundary for their strong and positive relationship to surrounding townscape. Notwithstanding this they are attractive and typical of the period and many retain original features. In addition the inclusion of these properties allows a robust boundary to be defined.

**Suggested Theydon Bois Conservation Area**

5.18 The suggested Theydon Bois conservation area is focussed on the central large 'Green'. Whilst much of the current built development is of no significant age there has been a settlement in the area for some time, with a small settlement by the name of Theydon Bois being recorded by 1438.

5.19 The proposed boundaries are tightly drawn to only include those buildings which are of architectural merit and of 19th century date or earlier. The suggested boundary extends northwards up Piercing Hill to incorporate the substantial 19th and early 20th century housing which is of a traditional character and provides an attractive backdrop to views across the green. The conservation area boundary would also
incorporate the Parish church, churchyard and former school building as well as a small number of properties on Coppice Row that provide a coherent and logical boundary.

5.20 In addition it is suggested that the 19th century villas on the west side of Piercing Hill are included within the potential Theydon Bois conservation area. These villas are of particular note, a number are included on the local list, and create a consistently attractive group which illustrate the private enclosure of the forest in the mid-19th century prior to the protective legislation coming into force.

5.21 Whilst there are a number of properties of no special architectural or historic interest along Piercing Hill which would be included within the suggested boundary it is felt, on balance, that their inclusion is necessary in order for the boundary to be logical and robust. Any future appraisal and management plan can set out the special interest in detail.

**Suggested Area Designations Provided By Stakeholders**

5.22 A number of conservation areas were proposed by stakeholders as part of the engagement process with a particular concentration in the Loughton and Buckhurst Hill areas.

5.23 When considering these proposed conservation area designations we have been mindful of the high thresholds for designation set out in s.69 of the Planning (Listed Buildings & Conservation Areas) Act 1990. In addition we have had regard to the guidance contained in the National Planning Policy Framework which notes at paragraph 127 that:

"When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest."

5.24 These areas were reviewed in detail as part of the HAR process and it is our view
that only one, the suggested St John’s conservation area in Buckhurst Hill outlined above, would justify designation as an area of special architectural or historic interest.

5.25 Generally the areas proposed for designation are pleasant suburban streets with housing that dates from the early 20th century to the interwar period. Whilst the building stock is attractive and there are isolated examples of individual buildings/groups of buildings of better quality or attractive landscaping of note there is not, in our view, enough consistency or intrinsic interest in those areas examined to warrant designation as a conservation area of special architectural or historic interest.

5.26 Irrespective of our view that these areas do not meet the high threshold for designation by virtue of an inherent lack of special interest or an incoherent mixture of architectural merit, it should be noted that the majority of these areas have undergone significant incremental change in the form of replacement windows, doors, roofing materials, the loss of traditional boundary treatments and front gardens to hardstanding. The cumulative effect of this change is significant and has further undermined claims to architectural or historic interest which these buildings and areas may have.

5.27 Particular consideration was given to the proposed designation of The Broadway, Debden as a conservation area. The two shopping blocks do have some historic interest given the association with the London County Council’s Architect’s Department, who at this period were highly regarded.

5.28 The area is characterised by modern buildings that embraced the austere modernist architectural form; they have a classically inspired Modernist design which bears some similarities to Scandinavian Modernism of the pre-WWII and immediate post-WWII period. Whilst the fronts of the commercial buildings are relatively successful, albeit austere, compositions the rear elevations are unattractive with a setting that is compromised by the extensive areas of car parking.

5.29 In buildings of this minimalist architectural character and relatively recent date the key consideration for statutory protection as a designated heritage asset has to be integrity of design quality including the retention of original materials and detailing. Regrettably the architectural integrity has been undermined by significant alterations.
in the form of modern shop fronts and signage and the replacement of a large proportion of the original windows to the residential properties with modern examples including uPVC.

5.30 In this case it is our view that the degree of alteration is so significant that the area, whilst of some historic interest, does not warrant designation as a conservation area.

5.31 Notwithstanding this assessment, any conservation area designation would, in our view, need to be accompanied by an Article 4 direction and design guide. This would provide the Council with a greater degree of control over future cumulative changes whilst also providing a basis upon which improvements could be sought.

5.32 In light of the localism agenda it is suggested that any such designation and additional controls would have to be supported by the majority of the affected parties in order to be effective.

An Alternative Approach to Conservation Area Designation

5.33 Whilst the majority of the areas suggested by local stakeholders do not warrant designation as conservation areas they are, for the most part, attractive and cherished streetscapes. The character and appearance of these areas is, generally, pleasant. It is our view that the plan making process should recognise the particular townscape qualities that create these successful streetscapes to ensure that these characteristics are retained, and where possible, enhanced.

5.34 This view is reinforced by the number of responses which were received as part of the stakeholder engagement process. It is apparent that there is strong communal value associated with these cherished streetscapes. Whilst these areas do not, in our view, warrant designation as a conservation area they could, perhaps, be subject to a different tier of protection at the local as opposed to national level.

5.35 One potential approach would be a local area designation that is similar to local listing for individual properties. This could, for instance, be a designation of areas of 'Local Townscape Merit'. The NPPF continues the idea of designated and undesignated heritage assets set out in PPS5 and a robust justification could be made to apply the principle of undesignated heritage assets to areas of townscape. The
plan making approach advocated by the NPPF would allow for a flexible and creative response that protects cherished local townscapes and as such it is our view that such a designation would be entirely in accordance with the NPPF.

5.36 As the Council is in the process of plan making then there may be the opportunity to designate some or all of these areas as undesignated heritage assets as being of 'Local Townscape Merit' with a summary of the key characteristics, or significance, as well as key policies to guide development in the area. This could, in time, be supplemented by more detailed guidance in the form of Supplementary Planning Documents or Design Guides which could be prepared in conjunction with the relevant Town or Parish council.

5.37 This suggested approach would allow those areas of local interest to be recognised in the development management process and ensure that their important characteristics are maintained. This would mean that the weight and importance attached to conservation area designations elsewhere in the District would not be devalued.
6.0 Summary of Findings - The Local List

6.1 In general the local list is a thorough record of the local heritage assets within the District. It encompasses a representative range of building types and age and for the most part the existing list is robust and there does not seem to be a need to suggest de-listing of significant numbers of buildings.

6.2 Appendix 8 contains a table, organised on a Parish by Parish basis, which identifies the significance, condition and risk of the existing and suggested locally listed buildings/structures in the District. In preparing the brief summaries of significance we are grateful for the assistance of stakeholders in offering their local knowledge so willingly.

Suggested Additions to the Local List

6.3 There are a sizeable number of potential additions to the local list including those suggestions which have come forward as part of the stakeholder engagement process. All suggestions have been subject to scrutiny in line with the Council's own criteria for locally listing buildings as well as the guidance contained within English Heritage's 'Good Practice Guide for Local Heritage Listing' (May 2012).

6.4 A total of 93 buildings and structures have been suggested for addition to the local list with a concentration in Loughton, Buckhurst Hill and Epping as the most densely developed parts of the District. Examples of those buildings which are suggested as additions to the local list include the following and wherever possible photographs have been included at Appendix 2:

- Chigwell station;
- Bank of England printing works, Langston Road, Loughton;
- 179 High Street, Epping;
- Norwegian War Memorial, Epping Road, North Weald;
- A number of 'Finger Post' directional signs throughout the District;
- Ye Olde Almshouses, Coppice Row; and
- St Helen's RC Church, Chipping Ongar.
6.5 An important part of the site survey process is the clarification of groups of locally listed buildings, most often former military sites, which often contain a number of significant structures/buildings. Where possible these have been identified and described separately at Appendix 8. The proposed additions to the local list are included as electronic data at Appendix 9.

**Suggested Removals from the Local List**

6.6 As noted earlier in this report generally the local list is a thorough and robust record of local heritage assets. There are, unfortunately, a small number of buildings which have either been demolished or altered to an extent which means they are no longer of heritage value. In addition there are isolated examples of buildings which are, in our view, not of sufficient intrinsic merit to warrant inclusion on the local list.

6.7 A full list of suggested candidates for de-listing is provided at Appendix 8, together with a justification for their removal; however, the eleven entries are set out below for ease of reference:

- ABBR-E04: Old School House, Beauchamp Roding, School Lane;
- BH-E10: Nos. 38 and 40 High Road, Buckhurst Hill;
- BH-E11: Nos. 42 A & B and 44 A & B High Road, Buckhurst Hill;
- L-E04: Great Downes Farmhouse, London Road, Lambourne;
- LO-E45: Nos. 40, 42 & 44 Smarts Lane, Loughton;
- MA-E01: Church Green Cottage, Matching;
- N-E08: The Crooked Billet Public House, Middle Street, Nazeing;
- SR-E01: Railings at Jubilee Green, Little End, Stanford Rivers;
- TB-E03: Theydon Lodge, Coppice Row, Theydon Bois;
- TB-E05: Ivy Cottage, Coppice Row, Theydon Bois; and
- WA-E28: No. 8, Sun Street, Waltham Abbey.

**Locally Listed Buildings 'At Risk'**

6.8 There are a small number of locally listed buildings which are considered to be 'at risk' within the District. In determining whether these buildings were at risk we have used the definitions provided by English Heritage in the national 'Heritage at Risk' register.
6.9 The condition of buildings is graded as: 'very bad', 'poor', 'fair' and 'good' whereas priority is assessed against the following criteria:

A  Immediate risk of further rapid deterioration or loss of fabric; no solution agreed.
B  Immediate risk of further rapid deterioration or loss of fabric; solution agreed but not yet implemented.
C  Slow decay; no solution agreed.
D  Slow decay; solution agreed but not yet implemented.
E  Under repair or in fair to good repair, but no user identified or under threat of vacancy with no obvious new user (applicable only to buildings capable of beneficial use).
F  Repair scheme in progress and (where applicable) end use or user identified; functionally redundant buildings with new use agreed but not yet implemented.

6.10 The locally listed buildings and structures which are considered to be 'at risk' are set out in Table 6.1 below:

<table>
<thead>
<tr>
<th>Reference</th>
<th>Building Name</th>
<th>Address</th>
<th>Condition</th>
<th>Priority</th>
</tr>
</thead>
<tbody>
<tr>
<td>E-E35</td>
<td>Milestone</td>
<td>Thornwood Road</td>
<td>Very bad</td>
<td>C</td>
</tr>
<tr>
<td>E-E27</td>
<td>Centrepoint</td>
<td>No. 23 St. John’s Road</td>
<td>Fair</td>
<td>E</td>
</tr>
<tr>
<td>E-E28</td>
<td>-</td>
<td>Nos. 19-21 St. John’s Road</td>
<td>Fair</td>
<td>E</td>
</tr>
<tr>
<td>HL-E02</td>
<td>Barns to west of High Laver Hall</td>
<td>High Laver</td>
<td>Poor</td>
<td>C</td>
</tr>
<tr>
<td>L-E10</td>
<td>Maltings for former Anchor Brewery</td>
<td>Market Place</td>
<td>Very bad</td>
<td>C</td>
</tr>
<tr>
<td>LO-E38</td>
<td>‘Plymouth Lodge’</td>
<td>No. 2 Lower Park Road</td>
<td>Demolished/Works Under way</td>
<td>-</td>
</tr>
<tr>
<td>NW-E04</td>
<td>The Cross Keys Public House</td>
<td>High Rd, Thornwood Common</td>
<td>Poor</td>
<td>C</td>
</tr>
<tr>
<td>NW-E07</td>
<td>Milestone</td>
<td>High Road</td>
<td>Poor</td>
<td>C</td>
</tr>
<tr>
<td>R-E07</td>
<td>Engine</td>
<td>High Street (north)</td>
<td>Very bad</td>
<td>A</td>
</tr>
<tr>
<td>Reference</td>
<td>Location</td>
<td>Condition</td>
<td>Grade</td>
<td></td>
</tr>
<tr>
<td>-----------</td>
<td>----------</td>
<td>-----------</td>
<td>-------</td>
<td></td>
</tr>
<tr>
<td>SR-E05</td>
<td>Roydon Station</td>
<td>Poor</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>WA-E10</td>
<td>Old Spotted Cow Public House</td>
<td>Poor</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>WA-E22</td>
<td>Cemetery Lodge and gates</td>
<td>Poor</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>WA-E23</td>
<td>Cemetery Chapel</td>
<td>Poor</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>WA-E27</td>
<td>White Lion Public House</td>
<td>Fair</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td>WA-E28</td>
<td>-</td>
<td>Fair</td>
<td>E</td>
<td></td>
</tr>
<tr>
<td>W-E05</td>
<td>Operations Block, Brick Store and Blisters Hangar Willingale Airfield</td>
<td>Very bad</td>
<td>A</td>
<td></td>
</tr>
</tbody>
</table>

**Table 6.1 – Locally Listed Buildings 'At Risk'**

6.11 There are, in our view, two critical cases which require urgent attention. These are the Engine Sheds at Roydon and the Operations Block & brick store on Norton Heath Road. As redundant structures with no end user identified and in advanced stages of decay, urgent action is required to stabilise or record the buildings.

**Suggested Additions to the Statutory List**

6.12 It also became apparent as part of the HAR process that there are a number of buildings that warrant further investigation for inclusion on the statutory list. These are outlined in full in Appendix 8, however, we note that there would be merit in a District-wide survey to complement the previous re-survey in the 1970s and subsequent thematic reviews and spot-listing requests. This is discussed in more detail in Section 7.0.
7.0 Recommendations

Additional Controls

7.1 The site surveys and stakeholder engagements suggest that there is a need to consider additional planning controls on a District wide basis.

Article 4 Directions

7.2 It has been noted that generally the biggest threats to preserving the character or appearance of conservation areas within the District is the prevalence of incremental changes which can have a significant adverse cumulative effect.

7.3 The most pervasive and harmful of these incremental changes is the loss of historic windows and doors as well as the loss of boundary walls and gardens to form car parking spaces, such boundary treatments can in suburban and rural areas often form an integral part of an area's aesthetic significance.

7.4 The review of conservation areas suggest that in those areas where there is a concentration of statutorily listed buildings i.e. Matching Tye or a commercial centre such as Epping then there is less need for additional planning controls via an Article 4 Direction given that most changes to a listed building require listed building consent if not planning permission and most commercial High Street properties do not enjoy significant permitted development rights.

7.5 In those conservation areas where the primary land-use is residential then there is more of a case for the imposition of Article 4(2) Directions in order to protect important historic detailing where it survives. This is particularly important in those conservation areas where commonality of detailing and materiality contributes to its significance. This has been recognised in the case of Great Stony School which had its 'permitted development' rights removed as part of the planning permission for the change of use to residential.

7.6 In determining whether to impose an Article 4(2) Direction it is crucial to understand
the particular threats to the existing character and appearance of a conservation area i.e. what has already happened within the conservation and similar areas in order to determine what, if any, permitted development rights are a particular threat to the significance of the conservation area in question. This will in turn determine whether an Article 4(1) or 4(2) Directions would be most appropriate.

7.7 In our experience the effective management and implementation of an Article 4 Direction requires commitment from the local residents who will be affected by the proposals together with detailed guidance on what alterations and extension are considered to be acceptable.

7.8 In undertaking this review it is our view on the basis of the current condition and particular significance that the following conservation areas could benefit from the introduction of an Article 4(2) Direction to control minor incremental changes allowed as 'permitted development':

- BA – Baldwins Hill;
- BC – Bell Common;
- CO – Chipping Ongar;
- EP – Epping;
- WA – Waltham Abbey; and
- YH – York Hill (extension to existing).

7.9 With regards to locally listed buildings the need for an Article 4 Direction is less clear and needs to be determined on a case by case/building by building basis in light of the particular significance of the building(s)/area(s) in question. This would entail a detailed evaluation of which permitted development rights, if any, could lead to undesirable alterations and therefore would warrant the introduction of Article 4 Directions.

7.10 In order to prevent the pre-emptive demolition of locally listed buildings outside of conservation areas, which can be undertaken as 'permitted development' subject to certain conditions we suggest that it would be worthwhile having a protocol in place that would allow the rapid issuing of an Article 4 Direction preventing demolition without the need for a full planning application to consider the merits of the case in detail.
7.11 Whilst individual recommendations will be made where appropriate the level of detailed work needed to determine the need for Article 4 Directions in conservation areas and on locally listed buildings goes beyond the remit of the HAR. The findings of the current review will, however, help to guide any further investigations on this matter.

**Area of Special Advertisement Control**

7.12 There is limited need for the imposition of Areas of Special Advertisement Control within the District’s conservation areas. For the most part the conservation areas are either residential in character or rural in location and as such are not under significant pressure for inappropriate advertisements. The few commercial and retail centres within the District which require some further consideration regarding advertising, such as Epping town centre, are adequately managed using pre-existing controls.

7.13 The one area which may benefit from the imposition of additional controls over advertising is The Maltings, Lower Sheering (and adjoining roads). The multiple occupancy of this building complex by commercial firms has led to an unsightly plethora of advertising on the verges, in the curtilage and on the building itself. The cumulative effect of these adverts on the significance of the conservation area and the parent building is significant and harmful and, in our view, warrants further consideration on the merits of imposing an Area of Special Advertisement Control.

**Thematic Review**

7.14 The HAR has demonstrated that the District has a rich and varied historic environment. The last comprehensive re-survey of the listed buildings within the District is likely to date from the 1970s with later efforts focussing mainly on ‘spot listing’ requests for individual buildings and thematic reviews of particular building types e.g. hospitals. This ad hoc approach means that a number of buildings which appear to be listable quality have not, as yet, been recognised. We have provided a full inventory of locally listed buildings which we consider to be of potentially national significance is included at Appendix 8.

7.15 Notwithstanding this element of the HAR it is our strong view that a District-wide
thematic survey of particular building types which are well represented in Epping Forest DC would be an invaluable tool in managing the District's heritage.

7.16 Whilst it was not within the remit of this review to undertake detailed research into each building of interest it is clear that there are a number of potential categories of building types that would warrant further investigation. These are:

- **Arts & Crafts Architecture** – the District has a fine range of domestic Arts and Crafts architecture by talented local architects. Loughton and Buckhurst Hill in particular has a high quality building stock by architects such as Herbert Tooley, RC Foster & Horace White. The work of these architects is comparable to many other listed examples;

- **Military architecture** – it will be seen from the descriptions of significance in Appendix 10 that the District has a legacy of military buildings and sites of regional and potentially national interest. A number of these have been recognised and statutorily listed or scheduled. Significant sites do, however, remain undesignated and as such their significance could potentially be at risk;

- **Art Deco Domestic Architecture** – the HAR uncovered a number of high quality Art Deco housing that could warrant inclusion on the local and statutory list; and

- **Milestones & Boundary Stones** – there are numerous examples of good quality late 18th century milestones and mid-19th Century City of London coal duty posts throughout the District. These elements of street furniture are vulnerable to damage or loss due to their isolated locations and functional redundancy. An understanding of the relative significance of these structures on a District and regional basis would be advantageous to determine whether they are comparable with examples which are statutorily listed elsewhere.

7.17 Adopting a pro-active approach will allow the Local Authority to understand the heritage assets within the District on a more comprehensive basis and therefore deliver their plan making and development management processes in a more proactive and positive manner. This would also allow applicants to be advised of the potential heritage significance of an asset at an early stage in the pre-application process thereby making it more effective and focussed. This would, in our view, be...
entirely in keeping with the requirements of the NPPF and would therefore be a valuable tool for officers and Members of Epping Forest DC.