

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

Piercing Hill.

- 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:

Reference	Building Name	Address	Condition	Priority
E-E35	Milestone	Thornwood Road	Very bad	C
E-E27	Centrepoint	No. 23 St. John's Road	Fair	E
E-E28	-	Nos. 19-21 St. John's Road	Fair	E
HL-E02	Barns to west of High Laver Hall	High Laver	Poor	C
L-E10	Maltings for former Anchor Brewery	Market Place	Very bad	C
LO-E38	'Plymouth Lodge'	No. 2 Lower Park Road	Demolished/Works Under way	-
NW-E04	The Cross Keys Public House	High Rd, Thornwood Common	Poor	C
NW-E07	Milestone	High Road	Poor	C
R-E07	Engine	High Street (north)	Very bad	A

	Sheds- Roydon Station			
SR-E05	Ongar Union Workhouse	Romford Road, Little End	Poor	C
WA-E10	The Old Spotted Cow Public House	Fountain Place	Poor	C
WA-E22	Cemetery Lodge and gates	Waltham Abbey Cemetery, Sewardstone Road	Poor	C
WA-E23	Cemetery Chapel	Waltham Abbey Cemetery, Sewardstone Road	Poor	C
WA-E27	White Lion Public House	No. 11, Sun Street	Fair	F
WA-E28	-	No. 8, Sun Street	Fair	E
W-E05	Operations Block, Brick Store and Blister Hangar Willingale Airfield	Norton Heath Road	Very bad	A

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.