

<b>Committee(s):</b>	<b>Date(s):</b>
Epping Forest and Commons	12 May 2014
<b>Subject:</b> Highams Park Conservation Management Plan – Progress Report No.2	<b>Public</b>
<b>Report of:</b> The City Surveyor (CS.086/14)	<b>For Decision</b>

### **Summary**

On 13 January 2014 your Committee considered my report on a consultation draft of the Highams Park Conservation Management Plan (CMP) and decided that there had not been sufficient time available to read and consider the draft document. Therefore, it was agreed that Members would email their comments for incorporation in this report.

Appendix A: Is a summary of the comments received from Members and Verderers. In addition, where appropriate we have included comments from the Heritage Estate team and those provided by the Debois Landscape Survey Group (the consultant putting together the CMP).

Appendix B: Is a site plan of Highams Park, which indicates the area the CMP covers.

This report seeks approval for the revised draft CMP, which incorporates the comments in Appendix A and Policies in Appendix C, to go out to external consultation with statutory stakeholders (Natural England and the local Planning Authority) and a simultaneous public consultation which the Superintendent is proposing to undertake via a dedicated portal. It should be noted that the policies should be regarded as guidelines/recommendations and not mandatory obligations placed on the City.

(Copies of this second consultation draft will be provided for Members' information in your reading room, from 30 April 2014.)

### **Public Consultation**

Because of the Planning Application for the works to the dam at Highams Park, the Local Planning Authority (London Borough of Waltham Forest) undertook a Public Consultation exercise which resulted in interest generally in Highams Park. It is therefore advisable to make the public aware of the CMP being created and of the public consultation being carried out via the CoL dedicated portal. In this exercise, managed by the Superintendent, the public will be able to access the Portal via the City of London's website.

### **Consultation Group**

It is proposed that a small consultation group consisting of two nominated members of your Committee, Officers and possibly the CMP consultant be set up to review the external stakeholder and public comments before the final CMP is formally submitted for Members' approval. This would also provide an opportunity for a final review of the CMP policies which are to guide the future

care and management of this historic asset in collaboration with the stakeholders, before going to Committee.

### **Recommendations**

Members are asked to:

- (a) Note the content of this report and the amended draft Highams Park Conservation Management Plan.
- (b) Approve the issue of the amended draft of the Highams Park Conservation Management Plan to the Local Planning Authority and to Natural England to invite their views and comments as part of Statutory-stakeholder consultation.
- (c) Approve the public consultation exercise by agreeing that the amended draft Conservation Management Plan can be added to the Epping Forest Public Consultation Portal.
- (d) Agree to the setting-up of a Consultation Group and nominate two Members to represent your Committee on the group, for the purpose of reviewing external stakeholder and public comments prior to submitting the final draft of the CMP for your committee's approval.

- Appendix A – Comments received
- Appendix B – Site location plan
- Appendix C – Highams Park draft CMP policies

### **Background Papers:**

CMP Progress Report to Epping Forest and Commons Committee of 13.01.2014

Julian Kverndal  
Senior Historic Heritage Officer  
T: 020 7332 1011  
E: [julian.kverndal@cityoflondon.gov.uk](mailto:julian.kverndal@cityoflondon.gov.uk)

## Summary of comments received from Members and Verderers

General

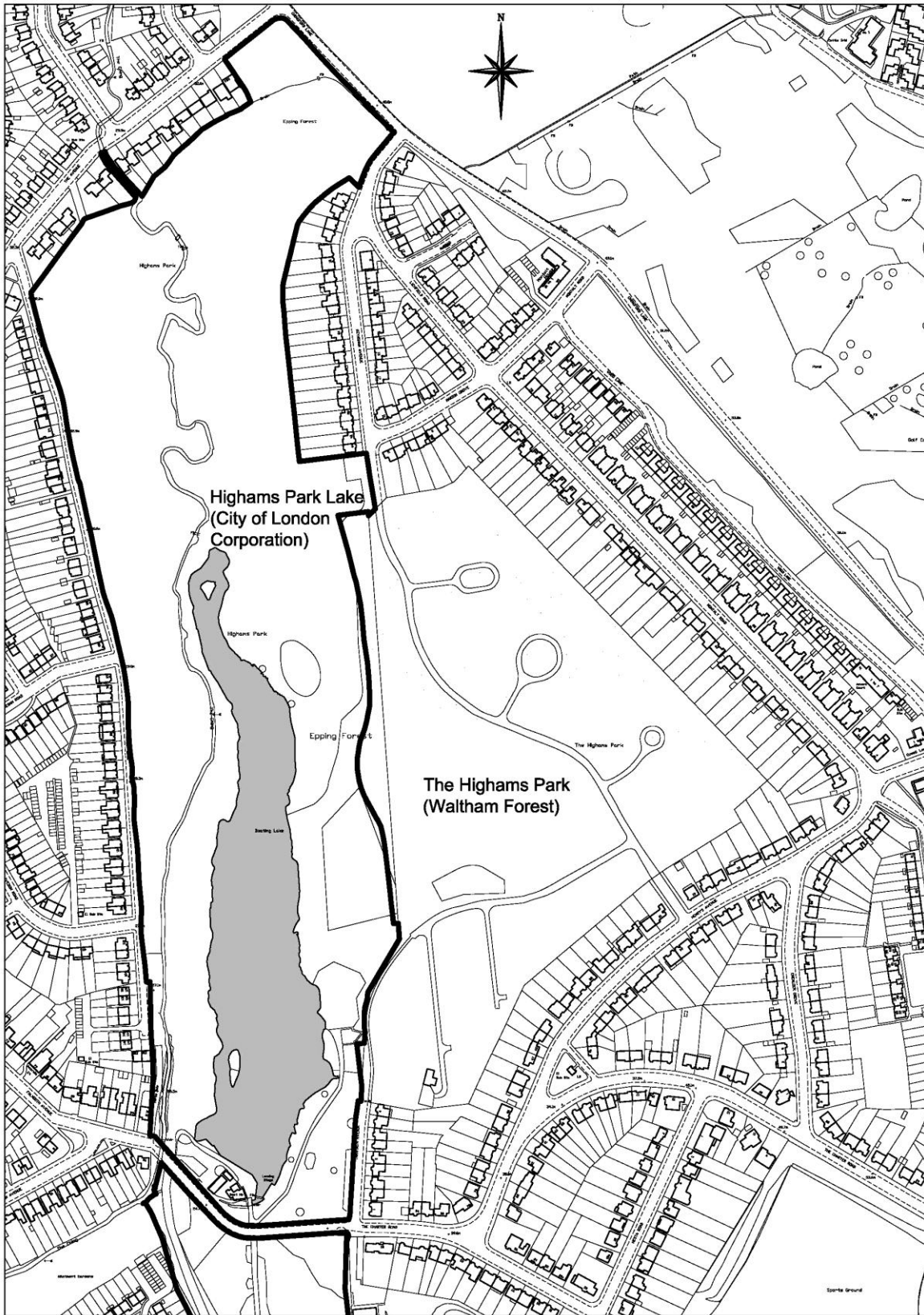
Comment		Response from CMP Consultant and the City Surveyor
1	It is far too long, 50 odd pages before you come to current day commentary.	<p>ICOMOS (International Council on Monuments and Sites) and the Heritage Lottery Fund give guidelines as to how a CMP should be laid out. It usually is necessary to deal with history first and work out how important that history is at local, regional and national levels, which then helps to value any surviving physical evidence of that history.</p> <p>Page and paragraph numbering has been improved to assist in navigating the CMP.</p>
2	There needs to be a paragraph inside the front cover that explains the background to the City of London commissioning this independent research, to avoid a view that this is the City's view of what should be done.	In line with the format used for all COL CMPs, background to the commission is at the end of the document on page 109. The information at the front draws attention to the copyright, which belongs to the City of London. Whilst copyright to the Repton images belongs to the Warner Estate.
3	Against the probability some of the document will be published – and I am very conscious you advise this will be placed on the City Corporation's website, so again, notwithstanding any 'disclaimer' I have suggested above (item 2).	It is proposed that some aspects of the CMP will be made inaccessible to the general public. An example would be budget estimates. However, in the case of this CMP, there are no such estimates.
4	The Consultants appear to prefer the option of restoring as much as possible of the 'Repton Landscape'. While I support some individual aspects of this, I do not believe that it is either desirable or possible to restore to the extent suggested and recommended. Does this not have to be agreed before the document is put in the public domain or we will end up with the same problem we had (have) with the CMP for Wanstead Park?	The recommended policies are not mandatory and are intended to only guide the maintenance and any future works at Highams Park which is a valuable historic asset. Any future proposals will be subject to the usual approvals and available funding. It is understood that the site is well looked after, the role of the policies being to enhance the historic landscape as far as practicable.

5	<p>The executive summary is poorly balanced, with over two pages of 'history' and two small paragraphs (taken verbatim from page 97) in terms of conservation management. This needs to be redressed, before the document is put in the public domain.</p>	<p>The executive summary has been shortened.</p> <p>Page and paragraph numbering has been improved to assist in navigating the CMP</p>
6	<p>The historical element concentrates excessively on the Red Book and its implementation without drawing distinctions between that and the interventions made by the Warners after they purchased the estate. It also does not put it in the context of the other, albeit smaller, estates that sprang up at the same time in the area and the appalling ravages of the area that were taking place there in the late 18<sup>th</sup> and early 19<sup>th</sup> centuries. The Epping Forest Act of 1878 and the saving of other commons around the 'great wen' was very much a reaction against this. It is no coincidence that it is a prime responsibility of the Corporation as Conservators of the Forest is to maintain the natural aspect' in their management of the Forest. Despite the undoubted significance of Highams and its park the report takes no account of this. There is no recognition of this duty in the way the report is presented and the recommendations made.</p>	<p>References to other developments that occurred in the early 19<sup>th</sup> Century made clearer.</p> <p>References to the Epping Forest Act appear in a number of places in the document, including the role the Conservators and their duty to protect the forest.</p> <p>For example paragraph 2.3.7 recognises the role of the Conservators in saving the landscape aspect of the Forest.</p>
7	<p>In the 200 years after the Red Book the Park has undergone a whole series of changes as indeed have the attitudes of society towards the management of such areas. Repton saw boating on the lake as a pleasant experience for people from Highams, not for large numbers of the general public. Boating ceased because there was not sufficient demand from the general public and there is no demand from commercial suppliers to re-introduce it. The very limited amount that goes on now is not for the public but for local scout groups. The construction of new buildings for lease on the Forest is seriously constrained by restrictions in the EF Act.</p>	<p>Recognition that there is now no commercial demand for boating on the lake has been clarified, including the fact that it's just used by the Scouts.</p>

8	<p>Although dealing with the house and grounds of Highams there is no consideration of that part of the estate that is once again Epping Forest and is now known as Woodford Golf Course. The other part of the estate that became the White House/Mallinson Park is mentioned but only in a very cursory way. I understand that the report steps from scheme to make the dam safe, etc., but the future of the Forest land in the area should not be considered in isolation from this.</p>	<p>The CMP's focus is on the City owned Highams Park Lake, and sets it in the context of Repton's landscape as well as Epping Forest which are critical to the site today. The references to the Golf Course and Mallinson Park have been added to the document.</p>
9	<p>There is no mention of costs – be they monetary or manpower – especially for the long-term maintenance of changed styles from what we have at present – e.g. the mown lawn aspect below the house which is recommended.</p> <p>What happens if there is a massive affirmative response to some proposal such as this, contained in this present document which City of London cannot meet long-term cost of?</p>	<p>If a policy is to be taken forward, which has financial and manpower implications, it will be subject to a separate report for Committee approval in the usual way.</p>
<b>Comments on Policies and Recommendations</b>		
10	<p>I agree with the need to integrate The Highams Park and the Forest land around the lake and indeed the desire to open up vistas or windows from one to the other. However, the report goes further by saying how the woodland should be managed as ancient woodland. I consider that this goes well beyond the remit of the plan and indeed the areas of expertise of the author(s). For example, in Epping Forest the concept of secondary woodland is almost meaningless and the significant feature of the Highams Park woodland is actually the large number of mature standard oak trees rather than a small number that have been pollard. There is no evidence that coppicing was ever a management regime in this particular area and any trees that look as though they have been coppiced are actually trees that have been cut down and have re-grown with multiple stems. This is an important distinction.</p>	<p>Although there appears to have been some coppicing and it is still practiced on other parts of the Forest, it's not a critical policy for the future of Highams Park and therefore has been removed.</p>
11	<p>To resolve these issues I think that the recommendations in the report need to be reduced both in number and the range they try to cover.</p>	<p>There are now 25 policies or recommendations, instead of the 30 number in the earlier draft.</p>

12	Policy 1. I do not support, and I do not think that it would be in the Corporation's interest to have Highams Park added to the Register of Historic Parks and Gardens.	<p>There may be some merit associated with Listing around increased intellectual access and improved opportunities for funding from a variety of sources.</p> <p>NB: the park is in any case locally listed in LB of Waltham Forest's Development Management Policies for the Highams area, in the Parks and Gardens of Local Interest category.</p>
13	Policy 6. (now 4) I am against invasive archaeology with or without a scheme of investigation.	<p>This is a positive and protective measure to make sure that any development takes account of the potential archaeology. This would also apply whenever the ground is opened up for maintenance purposes.</p> <p>Please note that, at present, the only place archaeological excavation is proposed is in association with the civil engineering works to the dam.</p>
14	Policy 8. (now 5) More detail is required if any of the Consultees are to respond with any meaningful comments.	<p>This is a general guidance note to try and re-establish some of the historic landscape, for example the coach drive to the west of the lake and the clearing of the scrub along the boundary with The Highams Park (LBWF).</p>
15	Policies 16/17. (now 12/13) I endorse the comment at para. 4.4.5 with regard to 'the current paths are made almost impassable by mud in winter'. What I had hoped to see was a proposal as to how this should be addressed, instead of just the proposal to recreate the Repton paths.	<p>Specific proposals regarding the paths would be subject of separate studies and submission in due course when required.</p> <p>The specific problem with paths becoming impassable by mud in the winter is a maintenance management issue.</p>
16	Policy 22. The fact that some trees may have historically been pollarded, does not automatically mean that pollarding should be re-introduced. Most of the historic reasons for pollarding no longer exist (Are the Consultants suggesting that cattle should be introduced around the Lake to 'puddle the edge with mud!'). Why cannot trees be allowed to grow naturally to great heights as in most other forests? Again the draft is lacking in balance and this should be redressed before it is issued.	<p>Policy now omitted.</p>

17	Policy 23. (now 17) I agree (re the removal of scrub vegetation along the boundary of the public park).	Noted; therefore no editing of the CMP required.  NB: Ideally all landscape work in the future will be guided by the CMP.
18	Policy 24. (now 18)I agree. The Conservators should in any event be doing this without the need to wait for a CMP.	Noted, regarding opening up views of the lake; therefore no editing of the CMP required.
19	Policy 28. (now 21) The maintenance of the northern end of the Lake has been raised regularly over the past ten years. Again the alternative option of filling in this part of the lake is not given. If this is a Public Consultation document, the alternative to an expensive restoration should be included.	This alternative option is now in the document, but there is no historical precedence for implementing it.  NB: Before any decision is made, a greater understanding of why the area silts up and an analysis of the H & S implications of each option is needed.
20	Policy 28. I do not support the proposal in para. 4.4.9 for the re-introduction of a regime of pollarding and coppicing.	Coppicing and pollarding policy omitted.
21	Policy 30 (now in policy 22). I agree. It should be happening now!	Noted, regarding maintenance of cleared areas to avoid them reverting to scrub.
22	I am not sure why Section 5 is headed 'Management Plan' when it only deals with the Dam and Boathouse, important as they are. In the light of the discussion at the January Meeting of the EFCC, would it be wise to amend one word in the last paragraph of the Executive Summary on page 9, from 'will' to 'may'.	In line with the agreed format, Section 5 is intended to hold all current data and be updated with the results of further studies, surveys and other appraisals as they are completed.  Because of the Committee decision to retain, for now, the boathouse for use by the Scouts, reference to it has been deleted from the executive summary.  However, the options available for relocating this accommodation have been left in the plan for future reference, if the subject is revisited, for whatever reason.



**The Area of Highams Park Conservation Management Plan**



**Highams Park CMP, Policies or Recommendations (As per the current revised draft CMP)**

The following are the recommended 27 Policies arising from the assessment of the site’s significance and intended to address the issues and vulnerabilities identified following the analysis of the heritage asset.

The policies have been grouped into three categories “Over-arching vision”, “General” and “Other”, and graded in order of priority “high”, “medium” and “low” for the appropriate conservation of the site.

In order for the CMP to be a practical success and the conservation of the asset taken forward positively, it is essential that these policies, regularly reviewed, amended and supplemented where necessary, are agreed adopted and implemented by all parties with a stake in its future.

The policies are listed in the CMP Chapter 4 – Issues, Opportunities & Policies and are summarised below.

**Over-arching Conservation Vision**

*Preserve the remains of the designed and former forest landscape at Highams for the use and benefit of the public, allowing the site to be part of the greater Forest – and interpreting it as such - and providing an access point from the dense residential areas to its south to the greater open areas to its north.*

*By active management restore the remaining sections of the designed landscape as far as possible to their early 19th century character, in line with the proposals made by Repton. Re-unite – visually – the lake area and public park to once again read as one single landscape and therefore consolidate the best surviving areas of the design.*

(CMP Implementation – Policy 4.5)

**Summary of Detailed Policies (Guidelines)**

Here, the policies or guidelines arising from the Issues and Opportunities section are summarised for ease of reference. They are graded into high, medium and low priorities, but it may also be helpful to think of them also in terms of timescale; some policies which have been graded as medium for example, are so categorised because they are not immediately achievable.

**Designation**

<p>(1) Consider disseminating the findings of this plan to English Heritage for adding the surviving, contiguous areas of the designed landscape to the Register of Parks and Gardens.</p> <p>While Highams Park enjoys statutory protection under the Epping Forest Acts 1878 and 1880, together with subsequent Nature Conservation and Town Planning designations, the particular heritage interest of the designed landscape could be further protected and benefit from becoming a Listed Landscape, because such a status is more likely to attract external funding.</p>	<p>LOW</p>
---	------------

## Gaps in Knowledge

(2) The City of London works with potential research partners to record or acquire unique or additional historical data sources and augment research into the history of the site wherever new opportunities and funding allow.	LOW
---	-----

## Interpretation and Public Appreciation

(3) Develop the wider public understanding of the history and significance of the Highams Park and Highams Park Lake landscape through events; improved site-based and digital information and interpretation.	MEDIUM
--	--------

## Archaeology

(4) It is recommended that the potential for archaeology be considered in all developments to the designed landscape that require excavation of some sort.  <i>NB: There is a policy of no invasive archaeology in Epping Forest without a prior scheme of investigation.</i>	HIGH
---	------

## Setting

(5) In strategic areas it is recommended that the landscape is enhanced in a manner which suggests it is a designed landscape within the context of the Forest and municipal park.	MEDIUM
(6) It is recommended that the City of London Corporation works with the London Borough of Waltham Forest and the Mallison Wood Trustees on restoration and re-integration of the two sections of landscape (lake areas and public park) and on the enhancement of the Mallinson Wood area.	HIGH

## Boundaries

(7) It is recommended that the formal boundary between the public park area and the lake area should be removed and with it the bulk of the vegetation which forms such a barrier in the landscape: this is a specific detail related to the above policy.	HIGH
(8) Consider the planting of appropriate trees and shrubs close to the boundaries of the suburban housing in The Highams Park to create a visual unity, ameliorating the effect of a jumble of fencing styles in the landscape.	MEDIUM

## Use

(9) It is recommended that the City of London Corporation ensures that the uses that the park is put to, are compatible with the historic landscape and do not do damage to the remaining evidence of this designed landscape.	HIGH
(10) It is recommended that the traditions of boating and fishing on the lake are continued, if it becomes financially viable to implement.	MEDIUM

## Access

(11) It is recommended that there should be no reduction in the number points of access to and from the park.	HIGH
---	------

## Circulation Routes

(12) It is recommended that the existing paths are surveyed to find out how much of their length / course follows the historic routes (shown on 1863 OS map).	HIGH
(13) It is recommended that the historic paths and drives that would be used by visitors, be re-instated wherever possible, using a historically appropriate surface.	MEDIUM

## Vistas and Design

(14) The re-opening of historic vistas is recommended, especially along the lake and from the parkland to the lake by the strategic clearance of vegetation.	MEDIUM
(15) Benches could be used to indicate design hot-spots by encouraging users to stop and experience the atmosphere of that place and the vistas from it.	LOW
(16) The earlier recommendation that the historic routes be re-instated, will allow some views to open up, change and reveal themselves, as the park visitor moves along the restored paths.	MEDIUM

## Trees and Vegetation

(17) It is recommended that scrub vegetation along the edge of the lake and the fence line with the public park is removed, and the open areas maintained thereafter. NB (this policy relates to policies 14 and 18).	HIGH
--	------

## The Lake and Dam

(18) It is recommended that more views of the water are opened, especially from the path along the west side of the lake.	MEDIUM
(19) The future management of the Repton dam, which now forms part of a statutorily designated Large Raised Reservoir dam, will reflect heritage management objectives wherever possible, once safety obligations as outlined in current legislation have been met.	HIGH
(20) To meet historic landscape objectives any future replacement of the existing Watersports Centre buildings should prompt consideration of the relocation of more appropriate buildings on a less prominent location within the site.	HIGH
(21) If appropriate finance becomes available, consideration should be given to having the northern end of the lake dredged, so that the historic outline of the lake is restored.	MEDIUM

## Maintenance and Staffing

(22) It is recommended that the City of London and the London Borough of Waltham Forest agree a cyclical maintenance programme for Highams Park and Highams Park Lake. This applies particularly to ensuring that the cleared areas do not revert to scrub.	MEDIUM
---	--------

## Other Policies

(23) This CMP will be formally adopted by the City as the strategic framework for guiding the future management of Highams Park.	MEDIUM
(24) The CMP will be made available in interactive intranet form (eCMP) [and through the City's website].	MEDIUM
(25) The CMP will be reviewed by the City periodically (ideally on a quinquennial basis as recommended by ICOMOS). The eCMP will be created in a format which can be updated following periodical review or as needed.	MEDIUM