

Committee(s):	Date(s):
Epping Forest and Commons Open Spaces and City Gardens	8 September 2014
Subject: Epping Forest Historic Environment Policy	Public
Report of: Superintendent of Epping Forest SEF 28/14	For Decision

Summary

The historic environment of Epping Forest and the heritage assets within it are a non-renewable resource that enables us to understand the origins and significance of our landscapes. The Epping Forest Act of 1878 contains specific duties to preserve and maintain historic features. Research into the history of Epping Forest and the City of London Conservators' responsibility under the 1878 Act is a continuing responsibility, which is addressed through conservation assessments, management plans, surveys and other processes.

The need for the historic environment of Epping Forest to be prioritised is becoming increasingly apparent: Wanstead Park is included on the English Heritage (EH) Heritage At Risk Register; an independent request has been made for EH to designate a site on Forest land; local groups have asked to undertake investigative work; and a new management plan for Epping Forest is being prepared which will cover the management of the historic environment.

In addition, evidence of enhanced management and recommendations for improvement, often as part of a conservation management plan or policy, have the potential to attract funding from organisations such as Natural England, English Heritage, the Heritage Lottery Fund.

The Historic Environment Policy aims to improve our understanding of the historic environment of Epping Forest in order to conserve and enhance it for the enjoyment of all, and to encourage visitors to value and care for it. The policy sets out principles for interacting with the historic environment of Epping Forest, rather than the Buffer Lands, whether by the City of London or by external bodies and individuals.

In 2013-14 £5238 was spent on heritage research to feed into various projects. Further minor spends are anticipated in the next few years. The Visitor Services Section has brought in £4869 in grants during 2010-14 to develop the museum collection, and further spends are anticipated to get the collection and archive store to accreditation standard.

Recommendation

I recommend that the Historic Environment Policy (Appendix 1), the aims of which are summarised above, is adopted.

Main Report

Background

1. The Historic Environment is defined in the National Planning Policy Framework (2012) as:
‘All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.’
2. The historic environment of Epping Forest and the heritage assets within it are non-renewable resources that enable us to understand the origins and significance of our landscapes. They range from listed buildings and ancient monuments to individual records, images and museum objects held within the Epping Forest museum collection and at the London Metropolitan Archive (LMA). They also include elements of the managed landscape such as veteran pollard trees.
3. The Epping Forest Act of 1878 contains specific duties to protect the historic environment. Section 7(iii) outlines the duty to ensure the preservation of the ‘natural aspect’ including ‘Ambresbury Banks, and all other ancient remains’, together with the ‘Purlieu Bank and such other Forest Marks and boundaries, if any and as still exist in the Forest’. Protection extends to: ‘the timber and other trees, pollards, shrubs, underwood, heather, gorse, turf and herbage growing on the Forest; and ... shall prevent all persons from felling, cutting, lopping or injuring the same, and from digging the gravel, clay, loam and soil of the Forest.’. Section 8 contains a specific duty to preserve and maintain the Queen Elizabeth Hunting Lodge and its garden, while an amendment to the Act in 1880 covers the duty to ‘preserve and maintain other historic buildings acquired by the Conservators’. These obligations make the Conservancy one of the oldest heritage preservation organisations in Britain.
4. Heritage assets make a positive contribution to local character and sense of place. Designated heritage assets in the Forest include seven Listed Buildings, two listed structures, three Scheduled Ancient Monuments, two Registered Park and Garden and 17 Conservation Areas. Parts of the Forest are also identified by the Local Authorities as lying within Archaeological Priority Areas and are sometimes locally listed such as Highams Park.
5. Much of the Forest is a Site of Specific Scientific Interest, a Special Area of Conservation and ancient wood-pasture. Epping Forest is also accredited as a Green Heritage Site. Within it are an estimated 50,000 veteran pollards, a remnant of man’s historic land use of the area and a defining feature of Epping Forest. Together with these worked trees, the land has been grazed throughout history and these two land uses through the wood-pasture system are what has shaped the habitats of Epping Forest that are present today.
6. This collection of protected sites and their settings are not the totality of what we consider important about Epping Forest’s past. For example,

the Purlieu Bank is mentioned in the 1878 Act but is not a scheduled monument. Many heritage assets remain undesignated and others, such as below-ground archaeological remains, may yet be discovered. The absence of national designation does not necessarily indicate lower significance.

7. The City of London provides a range of guidance on heritage in relation to the planning process within the local authority boundary of the City, on its Heritage web pages
<http://www.cityoflondon.gov.uk/services/environment-and-planning/planning/heritage-and-design/Pages/default.aspx>.
8. The following national guidance applies if we make a planning application within one of the local authority boundaries that incorporate the Forest. The National Planning Policy Framework published by Communities and Local Government in 2012 includes separate sections on conserving and enhancing the natural and historic environments. It states:
'Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.'
9. Guidance by English Heritage, *Managing Local Authority Heritage Assets* 2003 states: 'Understanding the nature, significance, condition and potential of a heritage asset must be the basis for rational decisions about its management, use, alteration or disposal.'
10. The strongest form of protection is people valuing the past and wishing to protect it for future generations. In order to promote this, we need to understand it.
11. The importance of the historic environment in relation to City of London's reputation as the Conservators of Epping Forest and access to funding opportunities is demonstrated by: Wanstead Park being on English Heritage's At Risk Register; heritage-related works undertaken with Heritage Lottery (HLF) funding; Higher Level Stewardship grants; and the Green Flag awards. We also receive local requests for designation and investigative work. Through these works we liaise closely with the City Surveyor's department. The draft of the new Management Plan for Epping Forest intends to include a dedicated section on the historic environment.
12. The Visitor Services Section at Epping Forest is working towards recognised museum collection accreditation from the Arts Council England. Museum Accreditation will enable us to apply for any museum funding that is appropriate to our collection. Epping Forest's status as 'seeking accreditation' has enabled the Division to access small funding streams and subsidise a Visitor Services Intern for 6 months.
13. Integrated landscape management as promoted by the European Landscape Convention (UK ratified 2006) notes:

‘that the landscape has an important public interest role in the cultural, ecological, environmental and social fields. ... The landscape contributes to the formation of local cultures and that it is a basic component of the European natural and cultural heritage, contributing to human well-being and ... identity.’

14. More information on the heritage of Epping Forest can be found on our website <http://www.cityoflondon.gov.uk/things-to-do/green-spaces/epping-forest/heritage/Pages/default.aspx>, including an Archaeological and Historical Summary.

Current Position

15. Although the greater focus for the management of the Forest has been on the natural environment, there is a need to improve the balance between management of the historic and natural environments.
16. There is a heritage objective in the Epping Forest Management Plan 2004-2010. Whilst this plan is now out of date the objectives found within still direct our work. The City of London and local partners are carrying out further research into heritage assets relating to the Epping Forest Acts 1878 and 1880, such as commissioning conservation assessments, management plans and surveys for our heritage assets. Other organisations have also commissioned Heritage Characterisation and Conservation Assessments for Epping Forest.
17. Quinquennial surveys are incorporated into the City Surveyor’s 20 year plan for significant Epping Forest heritage assets.
18. Epping Forest has also created a spreadsheet of all currently known Heritage Assets in Epping Forest, with a summary of their history, designation, location, current condition and recent works.
19. Regular Heritage Liaison meetings between the Epping Forest Division and the Heritage Estate Section of City Surveyor’s are resulting in better coordination of activities and better targeting of resources.
20. The current Environmental Stewardship Officer (ESO) (Conservation Section, Epping Forest Division) currently devotes up to 10% of her time to heritage in addition to managing the grants from Natural England (NE), which have related to the historic as well as the natural environment. Given her current commitments and existing vacancies in the Epping Forest Conservation Section, the ESO is unable to devote more time to heritage management. The historic environment element of the role includes:
 - maintaining a heritage asset register,
 - liaising with City of London and external heritage professionals,
 - managing consultants/contractors/students/volunteers undertaking historic environment field work and research
 - identifying funding opportunities to support historic environment work.

21. Heritage interpretation within the Forest Centres, and management of the museum collection, is managed by the Forest Centres Officer with responsibilities for heritage and interpretation. A range of heritage events and activities is delivered by the Visitor Services and Forest Keeper Sections and volunteers.
22. Items from the museum collection are on display at our three visitor centres, with the principal permanent exhibition being at The View. They are also used for learning activities and temporary exhibitions. The collection can be searched via an online catalogue <http://ehive.com/account/4145>.
23. The Epping Forest and Commons Committee as Conservators of Epping Forest is the governing body of the museum collection. A Visitor Services Intern is assisting with a submission this year to the Arts Council England for Museum Accreditation, the quality mark for museums and collections.
24. The principle Epping Forest archive collection is held by the LMA. Material that they have rejected, such as duplicates, repetitive material or reproductions, will be accessioned into the museum collection, assigned to a handling collection or the Epping Forest Division's reference library at The Warren as appropriate.
25. Very little archaeological fieldwork apart from non-intrusive survey has been done in recent times, although there has been excavation and survey at Wanstead Park and the Iron Age camps in the past.
26. Constraints mapping is being used to inform operations work in the Forest and includes known historic features.
27. The Epping Forest Historic Environment Policy (Appendix 1) has been produced with the advice of English Heritage's Greater London Archaeology Advisory Service and Essex County Council's Senior Historic Environment Consultant. The policy incorporates aspects of the Historic Environment Policy of NE (2009) and the Heritage Policy of British Waterways (2008) as along with English Heritage and Communities and Local Government publications.

Proposals

28. The Epping Forest Historic Environment Policy aims to improve our understanding of the historic environment in order to conserve and enhance it for the recreation and enjoyment of the public, as well as encouraging visitors to value and care for it.
29. The policy focuses on the preservation of heritage assets in preference to intrusive investigation. However, the procedure would be for any site investigation to be preceded by an assessment of significance and agreed research aims as part of a methodology. Any investigative work must be recorded and disseminated in accordance with national guidance.
30. The historic environment should be a consideration in all relevant Epping Forest documentation, policies, procedures and risk

assessments, for example Epping Forest's Breaking Ground Procedure.

31. While it is anticipated that the conservation of Epping Forest's heritage will be a responsibility for all staff, there is currently no heritage advocate or champion nominated within the current staff structure. While the Forest Centres Officer (Heritage and Interpretation) and the ESO have particular responsibilities, future staff reviews will need to consider the overall heritage responsibility in a more co-ordinated fashion.
32. Arrangements are in place for documentary material relating to the management of Epping Forest to be periodically offered to the London Metropolitan Archives.
33. It is a requirement of Museum Accreditation that museum policies and procedures be approved by this Committee before being submitted to the Arts Council England. A report will be presented to Committee on the museum accreditation submission.

Financial Implications

34. We undertake historic environment research and conservation work as part of the Local Risk budget. During 2013-14 £5,283 was spent on heritage research to feed into several projects across the Forest. Further heritage work will be included in future work programmes, these will include further research to feed into the management plans for Wanstead Park and the Iron Age hill forts.
35. The Environmental Stewardship Officer manages small to medium projects using external expertise. A business case to the Epping Forest's Local Risk budget would be made for larger projects requiring more resources, such as was done for the conservation statement for Wanstead Park.
36. The Environmental Stewardship Officer currently devotes 10% of her time specifically to the historic environment and any changes to this position would have to be part of the wider service based review.
37. There is the potential to access more grant funding for researching, conserving and improving access to the heritage assets of Epping Forest. A better understanding of our historic environment underlain by policy, and recommendations for improvement, often as part of a conservation management plan, will facilitate access to funding from Natural England, English Heritage, the Heritage Lottery Fund, and others.
38. The City Surveyor's Heritage Estate Section advises on heritage within Epping Forest and has a number of 20 year maintenance plans for surveys and conservation works. Where appropriate, bids may be made for Supplementary Revenue Funding or Capital funding for large schemes, such as those above £50,000.
39. The Forest Centres Officer (Heritage and Interpretation) has raised grants £4,869 in the last three financial years (2010-11 to 2013-14) to fund the development of the museum and the museum collection.

40. Epping Forest as a museum will continue to add to its collection by inviting and considering donations of objects from the public and by purchase. Accession of objects into the collection will be measured against a framework in the Museum Accreditation. Typically over the last three years, no more than £250 per year has been spent on such objects. If a significant object relating to Epping Forest were to come onto the public market, your Committee might wish to consider purchase but are otherwise expecting only small value additions.
41. The six month Visitor Services Intern post was subsidised to the value of £2500 by the Creative Employment Programme, working for Arts Council England (ACE) under the 'museum footprint'. The remaining cost of the post was met through vacant positions.
42. Museum Accreditation sets standards for storage, access, documentation and care of objects. These requirements are currently met within the Visitor Services budget: full Accreditation may require minor improvements to the Saw Mill to improve pest and damp infiltration and other ongoing minor costs.

Corporate and Strategic Implications

43. The Historic Environment Policy will impact on all works to buildings or sites that are or may contain heritage assets. In effect, this will involve consideration of heritage for any works in Epping Forest.
44. The City Surveyor's Heritage Estate Section and the Epping Forest Division consult each other on all works, in particular those targeted at known heritage assets.
45. The advice of the City Surveyor is to reduce as much as possible any reputational risk to the City of London in its care of its heritage assets.
46. Adoption of the Historic Environment Policy, and allocation of sufficient time and resources to manage the historic environment programme in Epping Forest, primarily through Conservation Management Plans, will help ensure that the City of London conforms to government guidance and best practice in managing its heritage assets.
47. By promoting volunteering to a more diverse audience and reaching out to specific communities, such as faith groups or those with a physical impairment, Epping Forest is increasing access to our activities in the Forest. This helps meet a key Epping Forest Management Plan 2004-2010 vision to improve accessibility for the purposes of education and enjoyment. Volunteering activities also contributes to two more Management Plan visions - to enhance the diversity of wildlife habitats and improve recreational activities.
48. The policy meets the City Together vision of a World Class City and, specifically, 4 of its 5 themes for 'A World Class City that supports our communities; protects, promotes and enhances our environment; is competitive and promotes opportunity; and is vibrant and culturally rich'.
49. Furthermore the policy meets one of the three Open Spaces Departmental Strategic Objectives within the Open Spaces Business

Plan for 2014-15 which is 'widening and developing what we offer to Londoners through education, biodiversity and volunteering.' The Business Plan describes how the Department's values will be met through planned activities, one of which is to apply for the Green Heritage Award. Also set out are longer term projects; a preparation of a Heritage Lottery Fund bid for the Wanstead Park project is planned.

Conclusion

50. The Forest has a communal heritage value that derives from traditional rights of access to the Forest safeguarded by the Epping Forest Act (1878), which ensures this important open space is conserved and protected for the recreation and enjoyment of the public. Under the Act, the Conservators have a duty to protect and enhance the historic environment.
51. The Epping Forest division is striving to ensure best practice in conserving and enhancing the historic environment and in particular our heritage assets. We recommend that the Historic Environment Policy be approved to support transparent decision making.

Appendices

- Appendix 1 - Proposed Epping Forest Historic Environment Policy

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Appendix 1: PROPOSED EPPING FOREST HISTORIC ENVIRONMENT POLICY

AIM

The City of London Conservators aims to improve our understanding of the historic environment of Epping Forest in order to conserve and enhance it for the recreation and enjoyment of the public, as well as encouraging visitors to value and care for it.

The following policies and principles govern how the City of London and its contractors will manage and interact with the historic environment of Epping Forest (not including the Buffer Lands).

It does not contain comprehensive procedural guidelines, which are provided by relevant professional other organisations and government departments.

Epping Forest Acts 1878 & 1880 extract:

Collective these are the primary act governing management of the Forest, including its historic features. However, all management decisions are also placed within the broader context of other guidance such as the National Planning Policy Framework and relevant legislation. The following sections of the Act are relevant to this policy:

“The Conservators shall at all times as far as possible preserve the natural aspect of the Forest, and especially shall pre- serve and protect the ancient earthworks called Ambresbury Banks and all other ancient remains, and the Purlieu Bank, and such other Forest marks and boundaries, if any, as still exist in the Forest; and shall protect the timber and other trees, pollards, shrubs, underwood, heather, gorse, turf, and herbage growing on the Forest; and, subject to the provisions of this Act, shall prevent all persons from felling, cutting, lopping, or injuring the same, and from digging the gravel, clay, loam, and soil of the Forest.”

“Queen Elizabeth’s Hunting Lodge, with the garden thereof, is hereby vested in the Conservators, for all the estate and interest of the Crown therein, and shall be preserved and maintained by them as an object of public and antiquarian interest.”

“Subject to the provision of Act, the public shall have the right to use Epping Forest as an open space for recreation and enjoyment.”

An amendment to the Act in 1880 covers the duty to ‘preserve and maintain other historic buildings acquired by the Conservators’. These obligations make the Conservators of the oldest heritage preservation organisations in Britain.

Other legal acts

Since the Epping Forest Act 1878 was written, further legislation that affects the management of the historic environment has come into place. These include the Ancient Monuments and Archaeological Areas Act 1979 as well as the non-legislative guidance in the National Planning Policy

Framework. This policy lays out additional management policies the City of London will follow in the management of Epping Forest's historic environment.

POLICY

1 We will continue to conserve and enhance both the historic and natural environment as a shared interrelated resource.

The importance of the Forest derives from its long history of human activity and this legacy should be reflected in the way we conserve and protect the natural aspect of the Forest as an open space for the recreation and enjoyment of the public. The importance of the relationship between the natural and historic environment should be considered in the way we approach all of our activities.

2 We will improve our understanding of the value, present condition and significance of the historic environment to help us make informed decisions about the future management of the Forest.

Understanding the value of a heritage asset, its present condition and what makes it significant is essential when making decisions about its future management, whether maintaining related habitats, enhancing its setting or improving public access. Assessing threats, for example from physical damage or erosion of legibility, and seeking the views of the local community is part of this process. Conservation Assessments, Management Plans, Surveys and Inspections will be prioritised for sites to which the 1878 Act applies and those that are most at risk, at an appropriate level of detail. Evidence that is captured should be made publicly available and used to inform the future management of the historic asset. All research, reports and relevant documentation will be submitted to the relevant Historic Environment Record.

3 We will care for the historic environment by maintaining our heritage assets, protecting them from harm and enhancing their setting.

When planning maintenance and new projects, opportunities for protecting, conserving, enhancing and improving access to the historic environment should be identified and integrated into what we do. We will maintain records of works to heritage assets and their settings so we can monitor and evaluate outcomes. Sustaining historic assets includes putting them to viable uses consistent with their conservation.

4 We will assess the effect of our actions on the historic environment.

Before starting any work project, staff, volunteers and contractors should assess and understand how their work may affect the historic environment. Even vehicular movement, for example, can disturb archaeological remains. Primary assessment will be done in-house using an inventory of known historic features. Specialist assessment will be required where there is a risk of affecting a historic asset or there is uncertainty that all historic features have been identified.

5 We will minimise the impact of our activities on the historic environment

Proposed works by our staff, volunteers, contractors and tenants should protect and enhance the significance of a heritage asset. If it is not possible to undertake work without impacting on a historic asset, a mitigation strategy should be agreed prior to work commencing. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

6 We will promote physical and intellectual access to Epping Forest's historic environment in a sustainable manner, so it can be valued and enjoyed by all visitors to the forest.

Improved access and interpretation will contribute to visitors' understanding, knowledge and enjoyment of the Forest, encouraging them to care about its future. Engaging the public is vital for the future preservation of the Forest; increased heritage education will enhance public enjoyment of the Forest, raise awareness and encourage people to care for it.

7 We will manage the physical impact of leisure activities in order to protect the Forest's historic environment.

Activities in the Forest should either benefit or have a neutral effect on the conservation and enhancement of heritage assets. We will seek prosecution through Epping Forest byelaws and relevant legislation for any deliberate damage to the historic environment.

8 We will continue to maintain and care for the museum collection, improving access to the story of Epping Forest.

Objects from the museum collection and archive are essential in illustrating the story of the Forest, and contribute to the content of display and interpretation. We will care for the museum objects, document/catalogue them and provide access to them through our Forest centres and events in accordance with professional museum collection standards. We will consider museum accreditation, ensuring these standards are upheld, and develop a collections management policy in line with regulations for museums. We will liaise with the London Metropolitan Archive over the Epping Forest collection.

9 We will seek to influence Local Authorities, statutory undertakers and other stakeholders in order to minimise the effect of development and other works on the significance of the Forest's historic environment.

Development and other works undertaken by others in and near to the Forest have the potential to affect the historic environment. The impact of proposals on the heritage assets and their setting should be considered when responding to consultations by Local Authorities and enquiries from landowners, developers and other parties. Partnership working with stakeholders should aim to ensure development or other works in or near the Forest respect our policies for the conservation and enhancement of the historic environment.

10 No site investigation with the potential to impact on the historic environment shall be undertaken within the Forest without the prior written consent of the City of London.

Any intrusive investigation may reduce the significance of an asset or impact on the natural environment and should therefore only be undertaken with the permission of the landowner, The City of London, and in accordance with its guidance and policies. Conservation and non-intrusive investigation are preferred. Any artefacts discovered are the property of the City of London.

Please note that this policy does not override statutory and legal provision, such as the Epping Forest Act (1878) and its byelaws, the Wildlife and Countryside Act 1981 (as amended 2007), Conservation of Habitats and Species Regulations 2010, Ancient Monuments and Archaeological Areas Act 1979, Treasure Trove (1996), and the National Planning Policy Framework. Nor can it be read as corporate policy beyond the Epping Forest division. All archaeological finds are the property of the City of London, unless alternative arrangements have been agreed in writing with the City of London.