

Mr Ian Ansell Direct Dial: 01223 582719
Epping Forest District Council

Civic Offices Our ref: L01130037

High Street Epping

Essex

CM16 4BZ 18 December 2019

Dear Mr Ansell

Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990

GRANGE COURT, 72 HIGH STREET, CHIGWELL, ESSEX, IG7 6PT Application Nos EPF2501/19 & EPF/2502/19

Thank you for your letters of 18 November 2019 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

Summary

It is proposed to vary the approved development at this Grade II* Georgian house, latterly a school building, by variation of condition 2, allowing the substitution of a new set of development proposal drawings representing an amended form of the development. Externally, the main alteration to the previously consented proposals would be the creation of a pair of roof terraces, replacing part of the previously pitched roof of the principal, three-storeyed section of the building. Internally the most radical change would be through the insertion of a passenger lift within the same, most significant part of the historic building, and the alterations to plan form and building fabric that would be necessary to accommodate it.

Historic England objects to the current application, which would result in an unjustified harm to the historic building. It has been demonstrated by the original application that a sustainable re-use of this former school building by conversion to multiple residential use can be achieved while avoiding this level of harm. The level of harm in the consented scheme was noted by us at the time as considerable. These proposed amendments would significantly increase loss of historic fabric and disruption of legibility of the original plan form. Such an increase in harm would be significant, and is clearly not acceptable when considered against the considerations set out in the NPPF.







We urge your authority to refuse the current application for variation of condition to the existing consents. As noted above, we have objections based on serious harm (as defined in the NPPF) to the listed building's fabric and appearance, and to the legibility of its plan form, which are key heritage grounds for objection.

If the applications are to be considered by your planning committee we would appreciate early notification of the date of the committee, and the opportunity to attend the meeting and speak. We would also be willing to answer questions from the committee. I should emphasise that Historic England rarely speak to Planning Committees, and that this offer is made due to our concerns that if this application were allowed it would result in an unjustified serious harm to a highly graded listed building of national importance.

Historic England Advice

Significance

Grange Court is a fine example of a Georgian gentleman's residence. The compact regular plan form of the three-storey main block disguise a multi-period building history. It seems fair to summise that at laest two eighteenth century building phases adapted an earlier high status house, of which some fabric appears to survive in the rear-pile chimney breasts and gable walls, and might be present in the unusual roof form over the deep plan. Alterations of considerable significance, and more than local note, were carried out by Sir Edwin Lutyens, one of Edwardian England's most acclaimed architects. In its handsome principal elevations and fine interiors it is a distinguished example of a building type once common on the fringes of London. Grange Court's significance is reflected in its listing at Grade II*. The significance of the listed building is considered at greater length in our initial letter to your authority regarding the proposed conversion of the building, dated 22 February 2017 and hence I do not propose to restate it here.

Impact

The proposed variations to the existing consents (EPF/3275/17 & EPF/3264/17) include external alterations, most notably the formation of a pair of external terraces on the roof of the central, three storeyed, principal block of the listed building. Access to the terraces would be achieved by an extended secondary stair, which would be housed in a new enclosure. A lift-over-run chamber and more minor elevational and site layout amendments are also proposed.

We have very serious concerns regarding the impact that the proposed roof terraces would have on the original form of the building, and the complex building history and evolution that this reflected. If constructed, they would be in an area of the roof that is currently stripped and dismantled. We understand from conversations on site with the applicants and their advisors, and with officers from your authority, that this extensive removal of historic fabric was carried out in the belief that the work was necessary.







and little or no drawn or photographic record, of the historic fabric, the necessary repairs, or the works as they were being carried out, appears to have been made. If this is shown to be the case, serious damage to the significance of Grange Court has occurred. When visited at the date of the initial application, the roof structure was partially concealed by the interior finishes of the third floor rooms, but was clearly of considerable interest. In particular, the rear roof pitches might have reflected earlier forms of the house known to have existed here.

The introduction of the roof terraces would require considerable further harm, from the redesign of the historic roof-form of the listed building, and introduce alien forms not usually associated with houses of this age and distinction. In preventing the restoration of the roof in its original form, in all its complexity, it would block works essential to reinstate an important part of the listed building, that has been dismantled, we understand, without appropriate consent, that was indicative of the building's significance would be permanently lost.

Internally it is proposed to introduce a passenger lift at the centre of the main block. Our concerns with such a proposal relate to its impact on the historic plan-form of the building, and surviving historic fabric and finishes. A lift located in such a prominent position within the original house would have a considerable visual presence. It would impact on key historic spaces and result in the loss of historic fabric of walls, floors and ceilings that would need to be broken through to form new openings. The new lift enclosure would involve the subdivision of the central room on the garden front of the house on the ground and first floors. Both of these rooms are spaces of considerable historical interest, with surviving historic proportions and joinery. The changes, if they were to be carried out, would destroy the ability to appreciate the rooms as historical spaces, and would displace or conceal a proportion of the original joinery and other interior features. This would adversely affect the future understanding and appreciation of the historic building, and are contrary to the consensus approach achieved during the initial pre-application discussions involving the developers and their advisors, your authority and Historic England.

The changes to the consented conversion proposed in this application would clearly be a harm as defined in the NPPF. In our original consultation response letter of 22 February 2017 we objected to the proposals, as they were then presented, due to the unacceptable harm to the listed building, especially the interiors and plan form. Subsequent negotiations removed or redesigned a number of the more controversial features of the proposals, and in our response to consultation on revised proposals (letter of 28 February 2018) we withdrew our earlier objections. While noting in that letter that the scheme continued to have a considerable harm to the listed building, we accepted that your authority might assess the harms and benefits of the whole project and conclude that the harm caused by multiple unit residential conversion might be outweighed by the benefit of returning the building to a sustainable use. The serious harm represented by these proposed amendments to the consented scheme would







clearly shift the balance in such considerations, and hence the current application should be refused.

National policy as set out in the NPPF makes clear the government's commitment to sustainable development (para 7 & 8). Heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance (para 184). When considering the impact of a proposed development on the significance of a designated asset, great weight should be given to the assets conservation (para 193). Harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use (para 196).

Recommendation

Historic England objects to the applications on heritage grounds. We consider that the applications do not meet the requirements of the NPPF, in particular paragraph number 184.

In determining these applications you should bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Historic England objects to the current application, which would result in an unjustified harm to the historic building. It has been demonstrated by the original application that a sustainable re-use of this former school building by conversion to multiple residential use can be achieved while avoiding this level of harm. The level of harm in the consented scheme was noted by us at the time as considerable. These proposed amendments would significantly increase loss of historic fabric and disruption of legibility of the original plan form. Such an increase in harm would be significant, and is clearly not acceptable when considered against the considerations set out in the NPPF.

Yours sincerely

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