



# Heritage Impact Assessment

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Cookham Dene,  
Chislehurst

September 2023 | Project Ref 8234A



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# 1. Introduction

**1.1** This Heritage Impact Assessment (HIA) has been prepared by HCUK Group on behalf of Benaron Property Management Limited, owner of Cookham Dene, 2 Manor Park, Chislehurst. The application site includes a late 19<sup>th</sup> century detached house, designed by Sir Aston Webb for his brother, Alfred Edward Webb, a local historian. Cookham Dene was listed grade II in 1973 and is within the Chislehurst Conservation Area.



Fig. 1: Application Site Boundary

**1.2** Cookham Dene is described in the listing description as:

*"MANOR PARK, CHISLEHURST 1. 4407 Cookham Dene TQ 46 NW 5/287 II*

*2. Architect Sir Aston Webb circa 1882. Of irregular plan. 2 storeys and attics. Ground floor brick. 1st floor tile hung with some curved tiles. Steeply pitched tiled roof with 2 gables on the north elevation, 1 of which is half-timbered, the*

*other roughcast. Large clustered red brick chimney stacks. Irregular fenestration with some casement windows and some sashes. The main doorcase is on the north front set in an arched surround under the half-timbered gable. The south elevation has a wooden verandah."*

### 1.3

The application site includes the main house with coach house to the north (curtilage listed) and separate modern garage building to the north-east. To the east and south are extensive grounds, part of which are within the greenbelt. A separate curtilage listed lodge is located outside the application site to the north-west of the house.



*Fig. 2: Garden Elevation (south) of Cookham Dene House*



*Fig. 3: The Coach House*



*Fig. 4: Aerial Photograph c.1980s*



Fig. 5: Proposals Map showing red hatched conservation area, greenbelt boundary and listed (red) and locally listed (orange) buildings.

## Proposed Works

- 1.4** It is proposed to landscape the grounds of the house and in doing so provide ancillary features including a tennis court with loggia, walled garden with greenhouse and a new three car garage to replace the existing 1980s garage building.
- 1.5** Separate applications for listed building consent and planning permission are being prepared alongside this application for various other works to the listed building, a new pool house and a new hanger, all of which are assessed in separate Heritage Impact Assessments.

## Scope of Assessment

- 1.6** This report provides an assessment of the heritage significance of the constituent elements of the site, taking into consideration their setting in accordance with paragraph 194 of the National Planning Policy Framework (NPPF, 2023). It provides an assessment of the effect of the proposals on heritage significance as required by the NPPF.



## 2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by sections 16(2) and 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.<sup>1</sup>
- 2.2** There is a broadly similar duty arising from section 72(1) of the Act in respect of planning decisions relating to development within conservation areas.
- 2.3** For the purposes of this statement, preservation equates to an absence of harm.<sup>2</sup> Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.<sup>3</sup>
- 2.4** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.
- 2.5** The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:
- The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.*
- 2.6** Historic England has produced guidance on development affecting the setting of heritage assets in The Setting of Heritage Assets (second edition, December 2017),

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<sup>1</sup> Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

<sup>2</sup> South Lakeland v SSE [1992] 2 AC 141.

<sup>3</sup> Conservation Principles, 2008, paragraph 84.

better known as GPA3. The guidance encourages the use of a stepped approach to the assessment of effects on setting and significance, namely (1) the identification of the relevant assets, (2) a statement explaining the significance of those assets, and the contribution made by setting, (3) an assessment of the impact of the proposed development on the setting and significance of the assets, and (4) consideration of mitigation in those cases where there will be harm to significance.

**2.7** The NPPF requires the impact on the significance of a designated heritage asset<sup>4</sup> to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.<sup>5</sup> The Scale of Harm is tabulated at Appendix 1.

**2.8** Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.<sup>6</sup> Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

*Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.*

**2.9** Paragraphs 199 and 200 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

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<sup>4</sup> The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

<sup>5</sup> Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

<sup>6</sup> The balancing exercise was the subject of discussion in City and Country Bramshill v CCLSG and others [2021] EWCA, Civ 320.

**2.10** One of the overarching objectives of sustainable development, as expressed in paragraph 8 of the NPPF, is mitigating and adapting to climate change, including moving to a low carbon economy. Historic England has a Climate Change Strategy, and has published Mitigation, Adaptation and Energy Measures. More specifically, Historic England has published a Heritage and Climate Change Carbon Reduction Plan (March 2022). These and similar strategies run in parallel with heritage-specific methodologies relating to the assessment of significance, and the effect of change on significance.

### Bromley Local Plan, 2019

**2.11** Bromley's Local Plan was adopted as the statutory Development Plan for Bromley on 16 January 2019 and, in conjunction with the London Plan is used to determine planning applications.

**2.12** Policy 38 'Statutory Listed Buildings' states:

*"Applications for development involving a listed building or its setting, or for a change of use of a listed building, will be permitted provided that the character, appearance and special interest of the listed building are preserved and there is no harm to its setting. Where a proposal is judged to cause harm then it will be assessed against the relevant test in the National Planning Policy Framework (NPPF) depending on whether the harm caused is substantial or less than substantial. In the case of change of use, it is often preferable that a building is used for the purpose for which it was built, but where new uses are proposed the impact of these on the special interest of the heritage asset will be considered carefully.*

*Applications for planning permission that involve total or substantial demolition of a listed building are wholly exceptional and will be considered as substantial harm and will be assessed against the tests laid out in paragraph 133 of the NPPF."*

**2.13** Policy 41 Conservation Areas states that:

*"Conservation Areas are areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.*

*Proposals for new development, for engineering works, alteration or extension to a building or for change of use of land or buildings within a conservation area will need to preserve and enhance its characteristics and appearance by:*

- *Respecting or complementing the layout, scale, form and materials of existing buildings and spaces;*
- *Respecting and incorporating in the design existing landscape or other features that contribute to the character, appearance or historic value of the area;*
- *and Using high quality materials..."*

## 3. Background and Development

**3.1** Cookham Dene was designed as a detached country residence in 1882 by Sir Aston Webb (b.1849) for his brother, Alfred Edward Webb (b.1850), a wholesale druggist and local historian. Alfred co-authored 'The History of Chislehurst: its church, manors and parish' with G.W. Miller and J Beckwith, published in 1899. Alfred was churchwarden of St Bartholomew-the-Great Church in Smithfield, where his brother was commissioned to restore the building throughout the 1880s and 90s.



*Fig. 6: 1870 Ordnance Survey Map prior to Cookham Dene's construction*

**3.2** Cookham Dene was reported on in the Building News and Engineering Journal, 1882 (Volume 42) with a sketch of the house with floor plan and a description of its form.

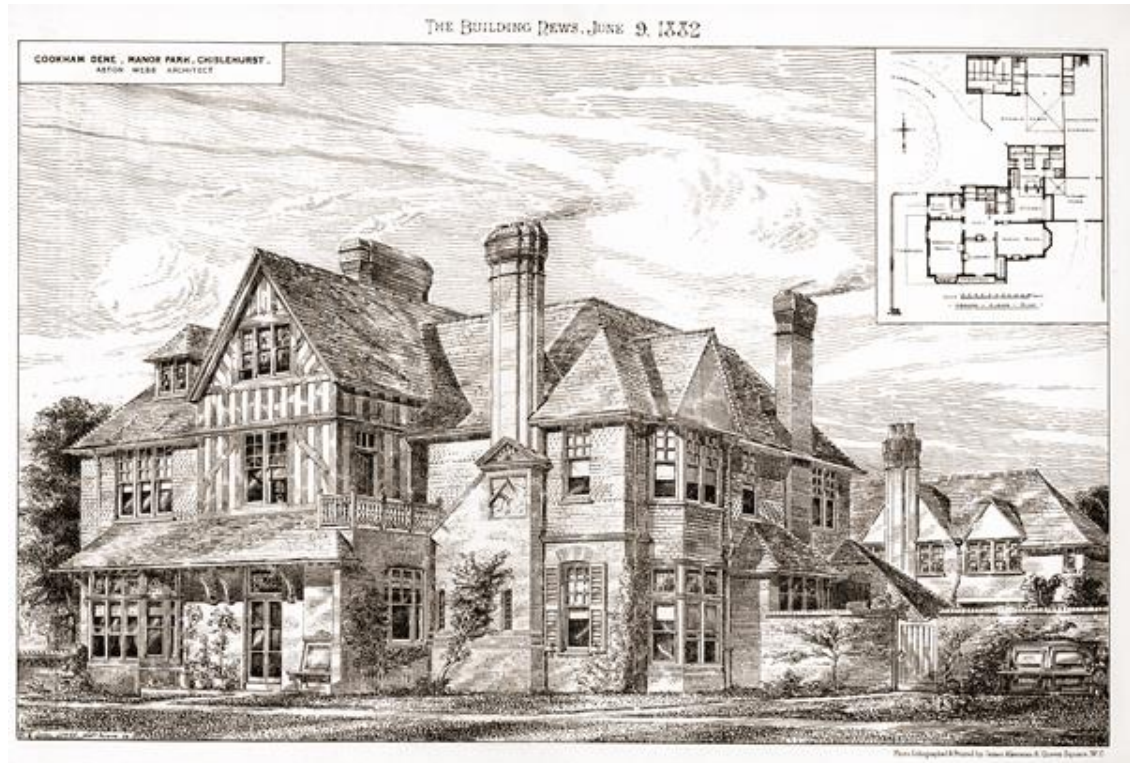


Fig. 7: *The Building News*, June 9<sup>th</sup> 1882, Vol 42.

#### COOKHAM DENE.

THIS house stands in a pretty part of Chislehurst, known as Manor Park, adjoining Panes Cray Common. The entrance-porch and offices are placed on the north side, leaving a southern aspect for all the principal rooms towards the chief view. The panelled entrance-hall is nearly square, and together with the staircase is executed in wainscot throughout; the kitchen is easy of access to the dining-room, from which it is separated by a hollow wall. A back staircase has purposely been omitted, but space provided for it if required at any time. The first floor has five bedrooms and dressing and bath-rooms, and four good attics in roof. The materials are Messrs. Punnett's red bricks and tiles, the walls of ground-floor being built hollow, and that of first-floor being 9in. thick and tile-hung; the stables are 9in. work throughout, Messrs. Punnett's hollow bricks being used. The work throughout is plain but substantial, and has been carried out by Messrs. Geo. Punnett and Sons, builders, of Tonbridge, and the plumbing by Messrs. Dent and Hellyer. The drawing is now at the R.A.

Fig. 8: Extract from *The Building News*, 9<sup>th</sup> June 1882 Vol 42



Fig. 9: Enlarged Ground Floor Plan from *The Building News*, 1882

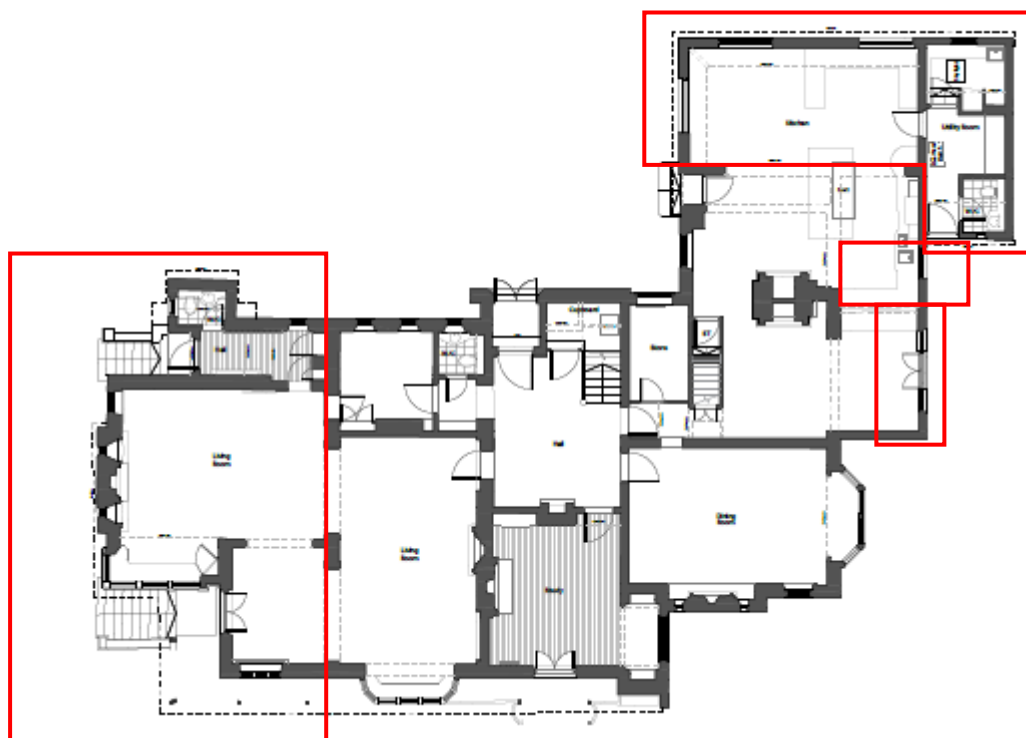


Fig. 10: Existing Ground Floor Plan - Areas within a red box represent additions to the original design that appear to have been implemented either during the original construction in the case of the living room to the west or later in the case of the north-east additions, by 1908.

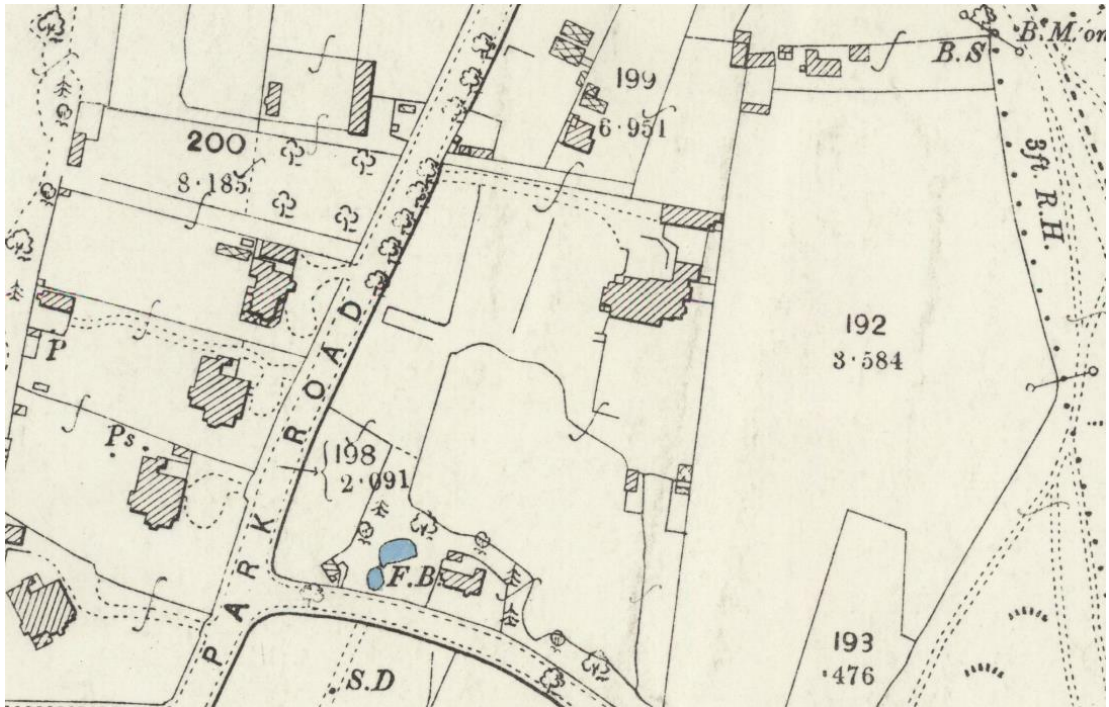


Fig. 11: 1895 Ordnance Survey Map, ten years post construction

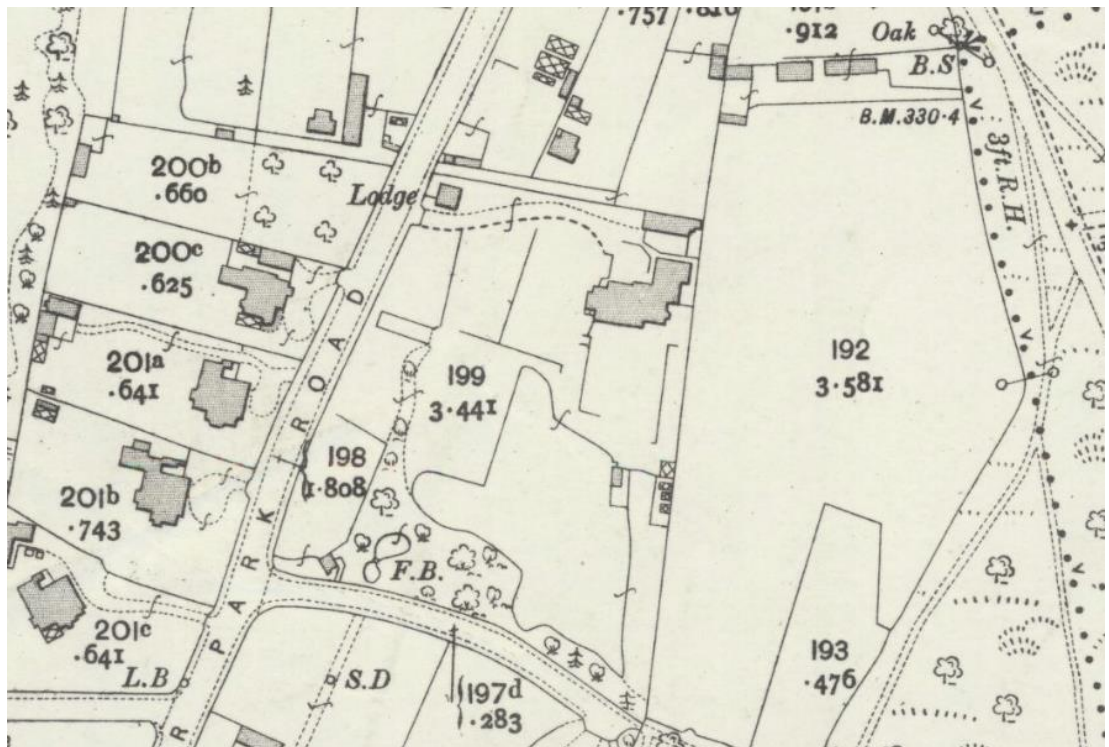


Fig. 12: 1908 Ordnance Survey Map, showing the Lodge to the north-west and the north-east corner of the building extended in comparison to the 1895 map



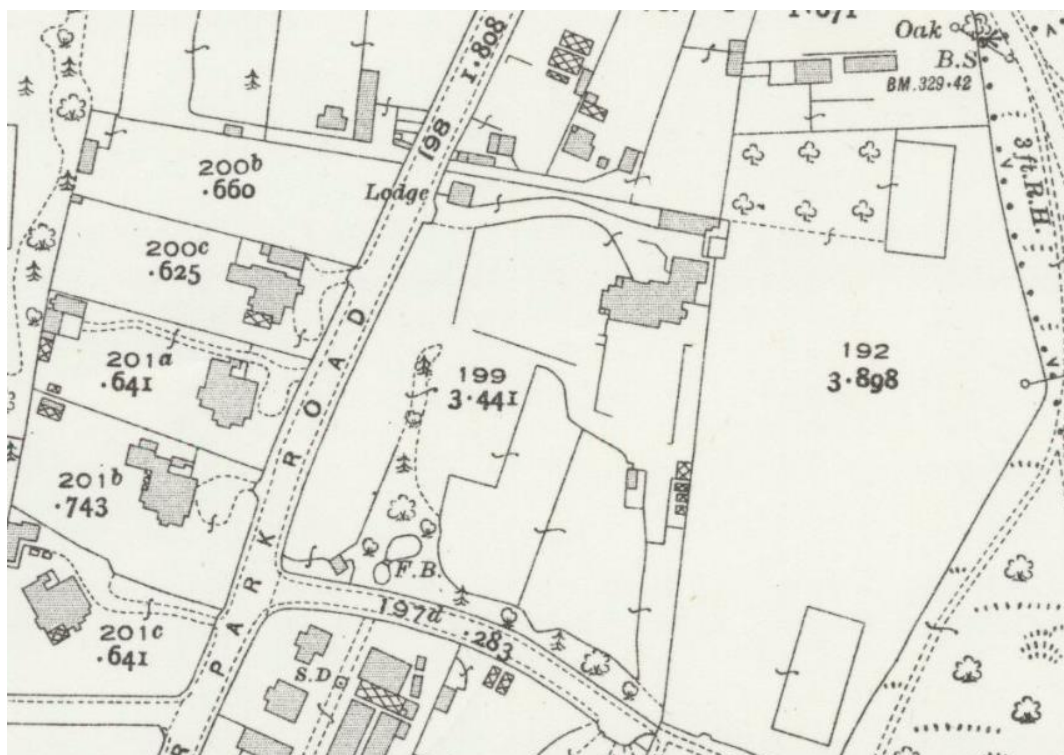


Fig. 13: 1930 Ordnance Survey Map

**3.3** Alfred, with his wife Emily, lived at Cookham Dene until at least 1899 but by the time of the 1901 census Alfred had moved away to Kensington. The Webbs had two children, their fourth and fifth of six, at Cookham Dene and Emily died, aged 42 on 24<sup>th</sup> January 1896 while the family lived there. According to newspaper reports Alfred held a charity bazaar over two days at Cookham Dene in June 1897. The event was to raise money for the local mission house extension and entry to the grounds and house was charged.

**3.4** The grounds during the 19<sup>th</sup> and early 20<sup>th</sup> century appear to have included all the land west of Manor Park Road and north of what is now known as Riverwood Lane. They also likely included land east of the house, which is on higher ground than the house and is now designated greenbelt land but still forms part of the landholding today. A boundary existed between the gardens of the house and the wider grounds where glass houses existed along the boundary to the south of the house. By the time the 1930 Ordnance Survey was produced two rectangular enclosures east of the house are shown, together with land used as orchard. The northern rectangle was a tennis court (as indicated on later ordnance survey maps), the southern rectangle could have been a walled garden serving the house. Both are shown on a

1946 aerial photograph. At this time the formal garden to the south of the house is depicted with a central lawn and trees surrounding it.

### 3.5

There is no doubt that the house was likely to have been well known in the local area and a photograph from 1911 shows the southern garden being used as an ice skating rink.



*Fig. 14: 1911 Photograph of south elevation of Cookham Dene*

### 3.6

During the First World War, Cookham Dene was used as a convalescent hospital for wounded soldiers. The house was then sold to Avery Hill College in 1948 and then in the late 1970s to the Milk Marketing Board.

### 3.7

The 1970s photographs of the southern elevation show a more open aspect to the north-west and west than exists today.



*Fig. 15: 1946 Aerial Photograph*



*Fig. 16: Southern Elevation of Cookham Dene, 1970s*



*Fig. 17: Entrance (north) elevation of Cookham Dene, 1970s*

## *Sir Aston Webb (1849-1930)*

- 3.8** Sir Aston Webb was widely considered to be one of the Victorian period's most significant architects. Following the early death of his parents before he turned eight, he came out of school and into the office of Banks and (Charles) Barry in 1867 at the age of 18, winning the Pugin studentship of the Royal Institute of British Architects in 1873.
- 3.9** Webb set up on his own but worked closely with Edward Ingress Bell, consulting architect to the crown agents for the colonies and student of George Gilbert Scott, between 1882 (the year he designed Cookham Dene) and 1909.
- 3.10** Among his most well-known works in London are the main Cromwell Road entrance front of the Victoria and Albert Museum (1891); the Royal College of Science (1900–1906, only part of the eastern wing of which survives today); the Royal School of Mines (1909-1913, now housing Imperial College's Department of Earth Science and others); the architectural elements of the Victoria

Memorial (1911); Admiralty Arch at the east end of the Mall (also 1911), and the well-known façade of Buckingham Palace (1913).

**3.11** Beyond the capital he and Bell were responsible for major civic and religious buildings such as the Birmingham Law Courts (1886-1891) the new Christ's Hospital near Horsham, in Sussex (1894–1904) and the Naval College at Dartmouth (1899–1904). At one time, according to Ken Allinson, Webb "had the largest practice in the UK" (250).

**3.12** Webb enjoyed many accolades during his career. He became president of the Architectural Association in 1884 and became president of the Royal Academy (1919–1924), only the second architect to be so honoured, after James Wyatt in 1805. From 1902-1904 he was president of RIBA. He was knighted in 1904 received further honours, including an honorary LL.D. from Cambridge in 1923, culminating in the G.C.V.O. (Knight Grand Cross of the Royal Victorian Order) in 1925.

## Planning History

**3.13** In 1983 permission was granted for the change of use of Cookham Dene at ground floor to offices with three self-contained flats at first and second floors (83/01018/OUT). The office use was only permitted for five years. The permission was renewed in 1990 until 1996 for the Staple Dairy Products Ltd and again in 1996 for a specific user until such time as the building was sold.

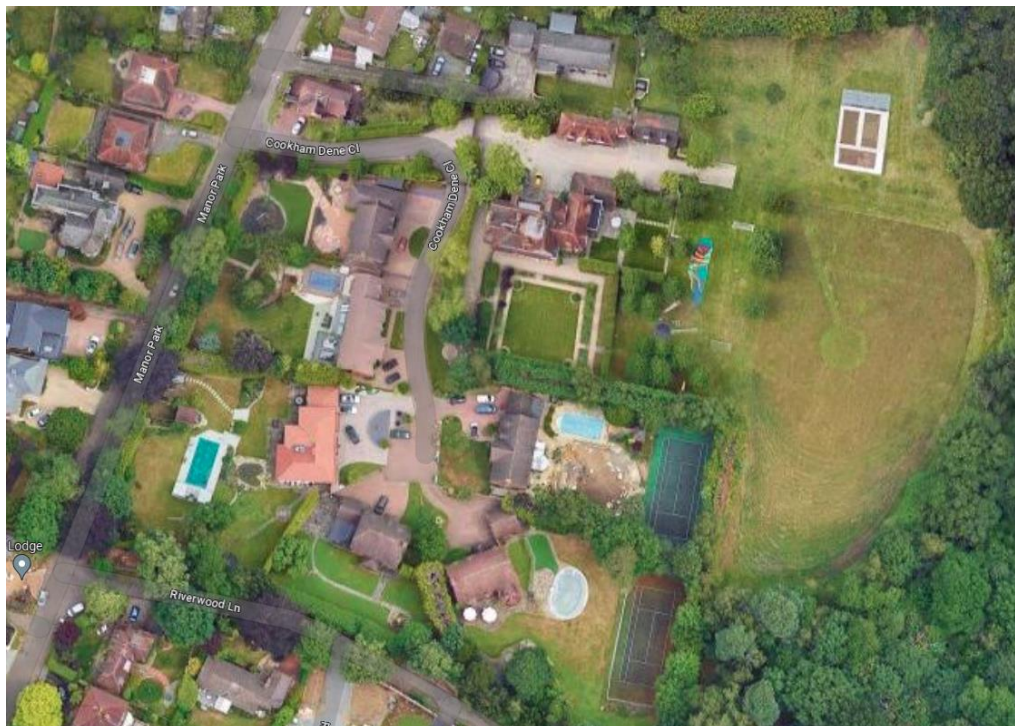
**3.14** Planning permission was granted in 1985 (85.0513) for the erection of six detached houses at Cookham Dene, creating Cookham Dene Drive within the once extensive grounds of the building. Two of these houses have tennis courts, and two others have swimming pools. At the same time listed building consent was granted for the demolition of a listed building (85.0847), potentially the curtilage listed greenhouses, to make way for these houses. At this time the landscaped grounds to the west and south of the house were changed to introduce new boundaries.

**3.15** A garage building was erected in the grounds, east of the coach house, which appears to date to the 1980s.

**3.16** In 1999 listed building consent was granted for works in the eastern part of the house, including the installation of a balcony off the master bedroom at first floor

(99/01509/LBC). At the same time consent was granted for the infilling of two windows and changes to a front dormer window (99/01537/LBC).

- 3.17** In 2000, planning permission was granted for a detached pool building located south-west of the main house (DC/00/0916/FULL). This permission was renewed in 2004 (04/0275/FULL) and an extension of time was granted in 2013 (DC/13/02163/EXTEND) but has now expired and has not been implemented.
- 3.18** In 2003 listed building consent and planning permission (03/03854/FULL6 & 03/03952/LBC) were granted for the demolition of a brick boundary wall and new brick walls, gate piers and landscaping which have all been implemented.
- 3.19** In 2006 planning permission was refused for a detached building housing a swimming pool and gym which was to form an extension to the existing three car garage. It was refused due to the effect on the greenbelt.



*Fig. 18 Current Satellite Image showing Cookham Dene grounds*

## 4. Statement of Significance

### Listed Buildings

- 4.1** Cookham Dene is a good example of a late Victorian country residence, which was heavily influenced by the Arts and Crafts movement. The house has historical interest because of its association with a celebrated British architect of the Victorian era and its first occupant being his brother. Historical interest is maintained in the surviving historic fabric, plan form, fixtures and fittings. Those areas of most interest include the stair hall, reception room, library, dining room and lounge, which surviving panelling and parquet floors. Albeit that later joinery added within the lounge is of an overly fussy Georgian-ised design at odds with the rest of the house. The external envelope has been altered but mostly sensitively and provides an eclectic and visually imposing presence within the plot of historical interest.
- 4.2** Architectural interest is evident through the external and internal character of the main house and the external character of the coach house. The use of red brick, tile hanging, render and applied timber together with the deployment of verandas, different sized windows/doors, steps, balustrades and dormers combine to provide an attractive single residence of architectural significance with distinctly Victorian character.
- 4.3** The house and coach house are not of specific archaeological value, being well documented. There are no basement areas to the house and the building is not designated for its archaeological value.
- 4.4** Cookham Dene is of undoubted aesthetic interest, enjoyed within the grounds and gardens to its north, east and south. Its interest is not primarily artistic, but individual elements of the building including stained glass windows and some internal joinery contribute to the artistic and aesthetic interest of the building.
- 4.5** The setting of Cookham Dene contributes to its architectural and historical interest. Although it has changed since the new houses were erected in 1985 the gardens and grounds of the building indicate its high status and size and have maintained the character of a spacious garden plot. The main house is appreciated visually from several areas, most notably from the front (looking south and east) in

conjunction with the coach house. Views onto its southern elevation area also of importance and the formal garden that has been relandscaped on several occasions contributes to the aesthetic appeal of the southern elevation, with its sundial feature.

- 4.6** Views toward the east and west elevations are more constrained by existing vegetation and boundary treatments and these are the less significant elevations of the building. Nonetheless, when standing in the raised field area to the east one can appreciate the scale and prominence of the house, even at the lower ground level. The southern garden is hidden from view by the mature hedging that divides the formal garden from the field.

## Chislehurst Conservation Area

### Character and Appearance

- 4.7** The Chislehurst Conservation Area was first designated in February 1972 and now comprises the original designated area combined with additional areas known as Chislehurst East and Chislehurst West which were both designated in March 1982. A subsequent minor change to the boundary was made in 1999.
- 4.8** Chislehurst Conservation Area is the largest in the borough and extends from Chislehurst Railway Station to the northern boundary of the borough. The designated area is predominantly residential in the west with rural and agricultural land in the east, and overall, it contains a diversity of forms of development and open space.
- 4.9** Supplementary Planning Guidance was produced for Chislehurst Conservation Area in 1999 and covers the historic development and character and appearance of the conservation area in detail. Of the historic development of the area the document notes:

*"Chislehurst's present form is derived from a number of physical and historical forces. Its topography is of long valleys and steep banks with a raised plateau at its centre. Upon this plateau are the commons around which scattered village settlement developed, surrounded for most of its history by large country estates and densely wooded valleys. A network of settlements and open areas*



*recognisable today formed around Chislehurst Common and the various routes crossing it."*

- 4.10** Following the arrival of the railway in 1865 there was an impetus of residential development led by a desire to escape the city and reside in a more rural setting with good links to London.
- 4.11** The supplementary planning document goes on to note that this led to an *"emergence of the fashions; philosophies and aesthetic best characterised by the Arts and Crafts Movement of the late nineteenth and early twentieth century, servicing a craving for a pre-industrial rural Arcadia."* Resulting from this, large dwellings based on an English vernacular were developed on spacious parcels of land within established woodland areas. These were sometimes individually designed but were often part of speculative developments.
- 4.12** Following from the way in which the area has developed there is an overall strong consistency of a rural, wooded and village character. Development tends to be either on the perimeter of the central common or slightly beyond it and it is the area's relationship with its commons that makes it distinctive.
- 4.13** The Chislehurst Conservation Area appraisal divides the area into 'sub-units' which reflect its diversity stemming from its large scale. The site appears to be located in Sub Area 12: Sub-unit 12. Manor Park, Prince Consort Drive and subsidiary streets, while the land to the east of the house is within Sub-unit 2: In and around the commons. Manor Park is described as:

*"These streets, and those branching from them, are characterised by large contemporary houses on spacious plots set amongst mature trees. Some earlier buildings are retained amongst the later development (such as The Old House off Manor Place, along with a lodge house and gates), providing important reminders of the earlier forms of settlement.*

*Given that these streets are not through routes and are not visible from the key parts of the Conservation Area, the retention of its wooded setting provides a supportive backdrop, which performs a useful subsidiary role within the Conservation Area.*

*The protection of mature trees and remnant early buildings and their settings are encouraged, along with ongoing establishment of trees, with preference for broad-leafed species, to enhance the wooded setting.”*

## Heritage Values

- 4.14** Architectural interest: The architectural interest of this part of the conservation area is chiefly derived from the detached historic houses occupying the Manor Park area, including Cookham Dene. Ancillary structures including lodges and coach houses are also of interest to the area. There are several locally listed buildings within the sub-unit to the west of the site that also contribute to the heritage significance of the area.
- 4.15** The retention of mature trees within the conservation area and open green spaces with dense woodland are reflective of the former large estates and the spacious grounds of larger houses that to some extent still comprise the conservation area.
- 4.16** Historic interest: Illustrative historic interest is seen in the development of the area over time. Initial, largely speculative development, following the construction of the railway dominates the sub-area.
- 4.17** Associative historic interest is derived from the use of Camden Place by the French imperial court when they were exiled in 1870. The location of Chislehurst as the scene of their exile has high historic interest, memorialised within St Mary’s Roman Catholic Church.
- 4.18** Artistic interest: No specific artistic interest has been identified for this conservation area although the houses in an arts and crafts style retain details of artistic interest such as stained or painted glass, carved panelling and other ornamentation that offers further aesthetic interest.
- 4.19** Archaeological interest: Due to the relatively recent development of the built form within the conservation area this is not considered to be of archaeological interest. Below ground archaeology lies outside the scope of this report.
- 4.20** The significance of the conservation area is of high value in a national context due to the concentration of designated heritage assets within it; some 60 listed

buildings, several of which are highly graded (four at Grade II\* and one scheduled monument – Scadbury Manor).

## 5. Heritage Impact Assessment

**5.1** This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter. The drawings supplied by Clague Architects should be read in conjunction with this section, together with the Design and Access Statement.

### Proposed Outbuildings

**5.2** An open sided loggia building with Kent peg clay tile roof and stacked clay tile columns is proposed for the east side of the new tennis court. The tennis court will be surrounded by a timber (chestnut) fence with a clipped hedge surrounding the court on all sides to soften its appearance in views from the surrounding grounds. The loggia will provide an open sided shelter with seating area and is a small subservient type of structure designed to assimilate into the existing built environment well. The tennis court is located where a tennis court was likely cited in the 1930, looking at the historical mapping.

**5.3** In addition, it is proposed to provide a kitchen garden with a simple fully glazed greenhouse at its northern end, with a solid brick wall forming its northern wall. Behind the wall, a lean-to store with areas for garden equipment and with compost heap areas is proposed, at a lower level than the wall. The kitchen garden would be delineated by box hedging rather than a wall and linked to the tennis court area via a path.

**5.4** To the east, alterations are proposed to the existing a three car garage building in order to improve its appearance and functionality. The footprint, scale and massing of the building will remain as existing and these changes are not considered to pose any adverse effects on the heritage assets.



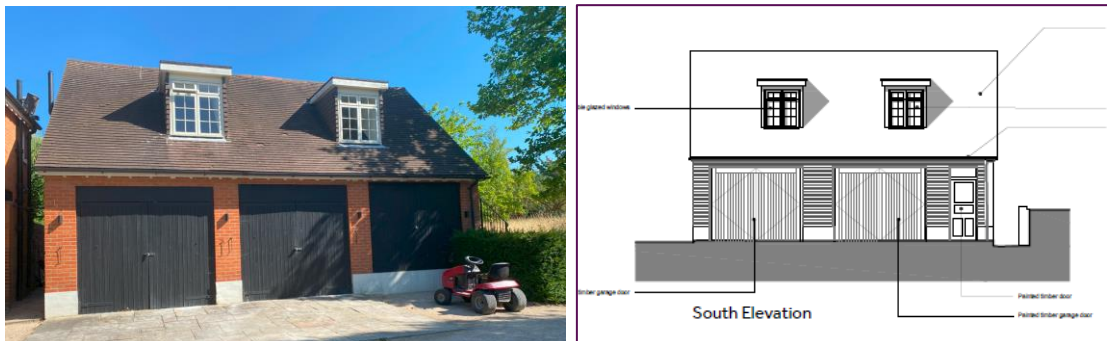
*Fig. 19: View of raised platform transition space between the immediate house grounds and the area within the greenbelt*



*Fig. 20: View of open land to the east of Cookham Dene used as informal playing field and garden space for the house*



*Fig. 21: Northern part of greenbelt land with fruit cages on former tennis court area*



*Fig. 22 Existing Garage (left) to be retained and altered (proposed south elevation on right).*

## Effect on the Listed Building

### 5.5

The proposed loggia and greenhouse, and the existing garage, are all small, ancillary buildings, designed to provide additional amenity for the main house. They have been designed in a traditional form, using materials that match the existing house and coach house to ensure the entire setting of Cookham Dene is preserved. Introduction of a tennis court and kitchen garden with the small accompanying structures is entirely in keeping with the status of Cookham Dene as a gentleman's country residence that would have once had both of these amenities. Indeed, the

houses built in the 1980s to the southwest of the Cookham Dene have tennis courts and swimming pools which are located in rear gardens of a much smaller dimension. There is plenty of space within the grounds for these additions to be added without any effect on the listed house or the coach house.

**5.6** Fencing around the tennis court is proposed as natural timber, allowing open views across the court. Similarly, the kitchen garden will not be walled, but delineated by hedges.

**5.7** The alterations to the existing garage, which is set back from the existing coach house southern building line, will have a neutral effect on the setting of the listed buildings. The garage will continue to provide space for cars and a security office in a building.

**5.8** Key views of Cookham Dene will not be affected by the addition of the proposed outbuildings, which are sympathetically located and designed. By using architectural styles that complement the architectural language of Cookham Dene the potential of the site as a whole would be realised and its longevity secured.

**5.9** The buildings would not be visible from the wider area due to the dense vegetation in all directions from other plots. There are multiple views from the grounds that are glimpsed through existing tree cover and evergreen hedges which are to be retained in the new landscaping scheme which means these buildings would not interfere with any key views toward the listed buildings.

**5.10** There would be no harmful effect the heritage values of Cookham Dene as a result of the proposed outbuildings.

## Chislehurst Conservation Area

**5.11** The proposed loggia, tennis court, kitchen garden, greenhouse and changes to the existing garage have been designed to respect the character and appearance of the Chislehurst Conservation Area. They are low key, traditionally detailed buildings and spaces, designed to assimilate into the landscape and take advantage of the space east of the house. These structures will not be visible within the conservation area aside from limited locations within the plot. No harm will occur to the conservation area as a result of the proposed outbuildings.

## 6. Conclusions

- 6.1** This Heritage Impact Assessment has been prepared by HCUK Group to aid the local authority, the London Borough of Bromley, in determining an application for planning permission for the construction of a loggia, tennis court, kitchen garden, greenhouse and garage within the grounds of Cookham Dene.
- 6.2** The proposed new outbuildings and the changes to the existing garage have been designed to respect the existing character of the setting of the listed buildings and are sensibly located away from the main listed house and coach house to ensure no interference with an ability to appreciate heritage significance. These structures within the wider grounds surrounding the listed building will be subservient and respectful, avoiding any interruption of the formal gardens or key views of the listed assets.
- 6.3** There will be no detrimental impact on the listed building or the ancillary coach house because of the outbuildings, which are located discreetly. Their design is sensitive to the Chislehurst Conservation Area and the wider built environment.
- 6.4** There will be no harm to the significance of the listed building or the conservation area as a result of the proposed works. Paragraphs 201-202 of the NPPF, 2023 are not engaged by the proposal.



# Appendix 1

## *Scale of Harm (HCUK, 2019)*

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 201 and 202, and guidance on NPPG).<sup>7</sup>

<b>Scale of Harm</b>	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

<sup>7</sup> See NPPG 2019: “Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.” Paragraph 018 Reference ID: 18a-018-20190723.

## Appendix 2

### *GPA3 Assessment: Historic England's guidance on setting*

In assessing the effect of the proposed outbuildings on the setting and significance of designated and non-designated heritage assets, it is relevant to consider how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main relevant considerations.

<b><i>Relevant Considerations</i></b>	<b>Cookham Dene Manor</b>
<i>Proximity of the development to the asset</i>	Garage is immediately adjacent to coach house, loggia is c.70m north-east and greenhouse c.45m north-east.
<i>Proximity in relation to topography and watercourses</i>	The loggia and greenhouse are on flat land, which is higher than the ground level of the house and coach house, and the garage but separated by vegetation. No watercourses of note.
<i>Position of development in relation to key views</i>	The garage is the closest building to the listed house and replaced an existing garage. Its improved design means it will enhance the existing situation with regard to views. It will not interrupt any key views and is appropriately set back.
<i>Orientation of the development</i>	The garage is orientated in the same way as the coach house, providing a parking court between the house and the garage, which is the most appropriate orientation. Likewise the greenhouse is south facing, north of the kitchen garden and the tennis court is on land previously thought to have been a tennis court or kitchen garden.
<i>Prominence, dominance and conspicuousness</i>	None of the structures will be dominant or prominent. Cookham Dene will remain the principal structure on the site.
<i>Competition with or distraction from the asset</i>	There will be no distraction from the primary asset as a result of the proposed outbuildings.
<i>Dimensions, scale, massing, proportions</i>	All appropriate for ancillary buildings to a large house.
<i>Visual permeability</i>	The open sided nature of the loggia and the glazed appearance of the greenhouse ensure permeability. The existing garage is

	to be retained and altered so there will be no change in visual permeability in that respect.
<i>Materials and design</i>	All proposed structures are designed with traditional materials and details to compliment the architecture of the listed building.
<i>Diurnal or seasonal change</i>	In the winter months, there will be more ability to see the outbuildings from some views, but the evergreen vegetation between the house and the wider grounds will ensure no obvious change between the seasons.
<i>Change to built surroundings and spaces</i>	The outbuilding will represent a change to the built surroundings of the listed house but this change is not assessed as harmful to significance
<i>Change to skyline, silhouette</i>	n/a
<i>Change to general character</i>	n/a

## *Standard Sources*

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

[www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)

<http://magic.defra.gov.uk>

[www.history.ac.uk/victoria-county-history](http://www.history.ac.uk/victoria-county-history)

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2021

National Planning Practice Guidance, 2019

Conservation Principles, Policies and Guidance, Historic England (2008)