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Research - Conserve - Campaign

Ian Smith Esq
Bexley Council
Civic Offices
2 Watling Street
Bexleyheath
Kent DA6 7AT
ian.smith@bexley.gov.uk

Dear Mr Smith,

Ref : 19/03072/FULM - Demolition of the existing dwellings and erection of a part 1/2/3 storey building to provide a 70 bedroom nursing home, with associated access alterations, car and cycle parking, landscaping and amenity space. 2, 4, 6 And 8 Danson Road, Bexleyheath, Kent.

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks & Gardens, as per the above application. We have liaised with our colleagues in the London Parks & Gardens Trust (LPGT) and are grateful for the opportunity to comment on this application, which has a material impact on the significance of Danson Park, a historic designed landscape which is Registered by Historic England at Grade II. The inclusion of this site on the national register is a material consideration.

We object to this application, which will impose substantial harm on the setting of Danson Park, and in particular its historic main entrance and avenue, which are described in detail in the Historic England Register entry.

The setting of Danson Park has changed dramatically since it was designed in the 18th century by Nathaniel Richmond, but its national significance as an 18th century parkland is still preserved and it can be clearly read and enjoyed as such. The historic main entrance approach contributes a key component to the park's continued significance as an 18th century landscape.

We do not object to the principle of a new building following the current line along Danson Road. We do however categorically object to the proposed building that stretches along the Danson Park entrance drive into the park.

The application's efforts to portray the entrance approach from Danson Road as inadequate is a wilful misrepresentation – rather it still presents and functions very successfully as the imposing entrance to a distant country house and parkland.

The proposal implies that it will offer an improvement on the current back garden buildings by drawing back from the hedge line, but clearly instead it replaces low key domestic buildings of a semi-temporary nature with a large and imposing permanent structure within the immediate setting of a key features of a nationally designated heritage asset. The development may be outside of the park's ownership boundaries, but visually it is very much development within the park landscape.

The Design and Access Statement suggests that the proposal will 'enhance the park's entrance', by creating a relationship between private and public space whereas currently there is a clear distinction between the blank walls of the private houses. It is clear to us that this is simply an attempt to justify the proposal's opportunistic efforts to piggyback on the park's resource for its own benefit, whereas the current 'blank walls' enable the park users to mentally edit out the modern buildings and instead focus on the park instead. It describes a desire to 'provide a visual exchange between the public in the park as well as the residents of the new proposal', but we see this only as an attempt to gain permission for the development to benefit from park views whilst the park users' suffer by having the visual distraction of the new development.

Danson Park plays an important role in the local community not only as an open green amenity space but as a publicly owned and accessible heritage asset of national importance. It is quite extraordinary that the application's Design and Access Statement should present this proposal for a commercial private care home as 'another amenity for the residents of Danson Park', when in fact it has a substantially detrimental impact on the existing and fully-public amenity.

The National Planning Policy Framework is clear that 'substantial harm to ... Grade II registered parks or gardens should be exceptional' (NPPF para 194), and that impact on a park's setting constitutes harm.

We ask that you refuse permission for this application in the light of the substantial harm that it will do to the setting and significance of Danson Park.

We would be grateful to be advised of your decision, or if further information is submitted.

Yours sincerely,

Margie Hoffnung
Conservation Officer

