

Rule 6 Party

Statement of Evidence of Effect on Setting of Danson Park

Site: 2, 4, 6 and 8 Danson Road, Bexleyheath, Kent, DA6 8HB

Proposal: 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.

Pins Ref: APP/D5120/W/22/3293225

LBB Ref: 19/03072/FULM

Speakers Credentials - Mr. Robert Andrew Knight MBE

I have worked in the Horticultural and associated Agricultural Industry all my life.

The gardening experience in my formative years was with guidance from my late father who worked in the Coal Industry. Both my great Grandfathers were in the Agrarian Industry. (Pre-industrial revolution.)

I trained with Rotherham Parks Department after leaving school, working alongside some of the best in the industry. Senior men who had trained and worked for Earl Fitzwilliam on the Wentworth Woodhouse Estate, Rotherham in the West Riding of Yorkshire. After the Two World Wars the Estate was devastated by Death Duties owing to the loss of numerous family members.

These experienced men migrated into local Parks and Gardens departments in Local Government. Rotherham Corporation allowed day and evening release to train for City and Guilds stage I, II, III and IV also allowing me to attend full time Agricultural College in Somerset and Cheshire.

I worked there for 11 years, being promoted to Area Foreman East (including the maintenance of the Town Centre floral displays).

I worked and served the London Borough of Bexley for 37 years up until my retirement. Therefore, my service spanned 48 years and was dedicated to Local Government Service (the magical 50 years' service alluded me owing to personal factors).

Nominated by The Managing Director of Turfsoil Ltd, Maidstone established Grounds Maintenance Contract (third Generation) for an MBE, Member of the British Empire (The Order) in 2005 and received the award the same year.

An active member of the Rotary Club of Bexley for 24years and counting.

The renowned International Organisation's motto is 'Service above Self'.

A past president of the Rotary Club (1988/9 and several other years).

Honoured to be a President of Welling Round Table 503 (2005).

A Freemason registered under the Grand Lodge of England.

Summary

I am writing on behalf of the Danson Neighbourhood Group to re-state our strong opposition to this proposed Major Development adjacent to the Grade II Listed Danson Park and the Surrounding Area.

1. Introduction

- 1.1 This Statement sets out the Rule 6 Party evidence regarding the Effect on the setting of Danson Park with the proposed nursing home development, relating to the appeal against the Council's refusal of planning application ref: 19/03072/FULM for proposals at 2-8 Danson Road, Bexleyheath, involving:

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.

- 1.2 The Statement of Evidence of Effect on the Setting of Danson Park is structured as follows:

Section 2 – Historical events
Section 3 – Environmental Matters
Section 4 – Landscaping Design (Proposed)
Section 5 – Conclusion
Section 6 –
Section 7 –

This statement has been prepared by:

Name: R A Knight Date: 21st November 2022

On Behalf of the Rule 6 Party

2. Historical events

- 2.1 1922 to 1924/5 - The Bean Estate (Mr. Alfred Bean Esquire purchased the House and Estate in 1862 and owned it until his death in 1890. His widow died in 1921.
- 2.2 The last private owners of the Danson Estate were the Bean family who managed the landholding by general agricultural practices. The work was undertaken from the old farmstead that stood on the East side of Danson Road, on the corner of the present Bean Road and the Alers Road Allotments site. Some original boundary walls and buildings are still standing to this day.
- 2.3 The area between the Lake and the Mansion were open to the public once a year courtesy of the Bean family to host the one-day Bexleyheath Gala, via a farm gated access on Danson Road (now the present Boathouse gate).
- 2.4 The existing Bean/Danson Estate was sold off at auction. The former Bexley Urban District Council bought 220/30 acres approximately in 1923/4. Certain parts of total purchase were re-sold (approximately twenty acres by BUDC) to Mr. J W Ellingham (a prominent local builder) who developed the "Danson Park Housing Estate." These are the existing houses that you see today on Danson Road and Danson Mead.
- 2.5 It is to be noted that the remaining area has been mirrored along the whole of Danson Road which includes the whole of The Grove, North and South Closes and Bean Road.
- 2.6 The income generated for the approved development by former Bexley Urban District Council was used to layout parts of the municipal public park for safe access, comfort and recreational pleasure. The first Park Superintendent was a Mr. Prentice who was charged in maintaining and enhancing this newly acquired Park.
- 2.7 The Park was officially opened by Princess Mary in 1925, the first Royal visit to this magnificent Public Park. The original size of the Estate in 1776 was some 600 acres.

- 2.8 1926/7 Danson Park Housing Estate - North Lodge (1 Danson Mead) was constructed first and used as the site office, and eventually a sales office, for Mr. B Francis Senior a local auctioneer and estate agent.
- 2.9 Once the newly built houses on Danson Mead and Danson Road were sold the house was handed over to the Bexley Urban District Council. This was then converted into two apartments and used as such until the early fifties.
- 2.10 It has been single occupancy since 1952 when housing was provided for use by Parks and Recreational employees as staff accommodation.
- 2.11 Employees were given the right to occupy the property for the better performance of their duties, whilst maintaining the grounds of Danson Park and its surrounding areas.
- 2.12 It was sold to the sitting tenant in 2014/5 and has been extended to the approved conditions set out by the experienced Bexley Town Planners at the time.
- 2.13 There is a Covenant on every property on Danson Mead and Danson Road, formally jointly signed by the former Bexley Urban District Council and Mr. Ellingham the Developer of the “Danson Park Housing Estate”.
- 2.14 These restrictive Covenants are still in place preventing the properties being used by any type of commercial business purposes (conveyed in perpetuity).
- 2.15 The proposed nursing home is a business without doubt – not a residential property. Why was this not taken into account before the planning process commenced and why is it now being total ignored? I presume that some knowledgeable lawyer will find some loophole to dismiss this historical binding agreement/arrangement.
- 2.16 1929 - Official opening of the Grand Entrance by Sir A Morris Wheeler J.P. This Historical Entrance at Danson Road/Crook Log Junction. A New Grand North Lodge Entrance befitting the status of the newly acquired, prized Public Park.
- 2.17 This entrance was planned to mirror some of the other gated Lodge entrances and define the four important corners of the Park (North, South, East and West).

- 2.18 The Morris Wheeler gates were officially opened on 22nd March 1929 to make an impact and were a statement of grandeur at this very important historical road junction.
- 2.19 One of the most important reasons why the Bexley Urban District Council allowed this Danson Park Housing Estate development was to secure and give protection to the Eastern and Northerly boundaries of this totally enclosed Park by private owners in the first instance. This therefore funded the long-term security at no cost to the Council for generations to come. The high-ranking Councillors who were the movers and shakers of their time, are seen as a reflection of a period of great civic pride in their local, home environment.
- 2.20 The development also completed the enclosure of this previously hedged and stock fenced boundary line giving adequate security to the Park. It is to be noted that one or two of the mature hedgerow trees are still visible to this day.
- 2.21 The whole of Danson Park was a locked secured and patrolled by uniformed personnel from 1925/6 up until 2014 when the Council was forced to impose huge budget constraints. This loss of monies on the Parks and Recreation budgets prevented this from happening and which consequently has had a detrimental effect overall on the security of this renowned Park.
- 2.22 1937 Lord Cornwallis – Lord Cornwallis presented Bexley’s Charter to become a municipal Brough in 1937 and was presented by him underneath the Charter Oak, one of the great trees of London.
- 2.23 1939 – 45 World War II - The Properties at number 2 and 4 Danson Road were extensively damaged including surrounding property by aerial bombardment and resulted in loss of life. All the females present in their homes were killed.
- 2.24 All properties were rebuilt and repaired to their original condition, therefore retaining the characteristic and visual outlook of the historical area.
- 2.25 The secured Park was used for training of the Home Guard and Air Wardens were stationed and positioned in parts of the Stable block on Danson Hill.
- 2.26 The Stable block also had residential accommodation within the building. Also at the rear was a Glasshouse Nursery and frame yard which was used during these turbulent years.

- 2.27 Parts of the Park that could be cultivated were put into food production for the War Effort and the Dig for Victory campaign.
- 2.28 There was a gun battery and barrage balloons facilities placed on what is now the footprint of Bexley Grammar School, including the playing fields in Danson lane.
- 2.29 1960's Formation of the London Borough of Bexley - This saw the amalgamation of the Urban District Councils in 1963 including the transfer of the Kent County Council's Education Department which resulted in huge changes and workings. In fact, the Parks, Recreation and Cemeteries Department staffing levels rose to nearly four hundred employees who were employed in maintaining everything that was green and pleasant within the newly formed Borough.
- 2.30 The Parks Director was a Mr. Frank Eul and he controlled all its complex workings from the Parks, Recreation and Cemeteries offices in the Danson Mansion House.
- 2.31 It is fair to say that Council members of the newly formed Borough were extremely proud of their excellent Horticultural credentials and this pride continued well into the early years of 2000.
- 2.32 1970's Local and Regional Importance of Danson Park - It is the premier Locally and Regionally renowned Public Park and a named area of the London Borough Bexley. On the Southerly flank of the park, this boundary, borders the Danson Interchange and the Dover to London A2 Trunk Road System in and out of Southeast London. It is managed and maintained by Transport for London.
- 2.33 The construction and improvement to this Trunk Road in the late 1960's meant that parkland was lost. Resulting in the loss of some ten to eleven acres and this required the repositioning of the South Lodge house and entrance.
- 2.34 The whole of this very important Parkland is Grade II listed as it happens to have a Grade I and a Grade II, listed buildings within it.
- 2.35 The grandeur of these buildings is only set off by the historical estate Parkland layout which surrounds them.

- 2.36 All great historical Houses are usually noted for the magnificent parkland setting, this still applies to the open public park surrounding these buildings.
- 2.37 The Appellant, the Council's Planning Officers and certain Councillors alike, to a certain degree, seem to have missed the most important point altogether that the Parkland is the most invaluable green asset that needs to be fully protected from any incursions; especially by this proposed over development.
- 2.38 The construction of the proposed overbearing structures two metres from the existing hedges will destroy the welcoming nature of the existing setting of Danson Park's North Lodge entrance and the tree lined avenue beyond leading to the two well used historical buildings.
- 2.39 Investment to Improve the Historical Buildings and Green Living Asset -
Over the past 96 years investment in the Park was carried out on an annual basis from capital and revenue monies authorised and generated by the Council, this in monetary terms is huge, this was to protect and enhance the overall Park asset for the safety and wellbeing of the ever increasing population after the two World Wars.
- 2.40 A tremendous amount of hard work in bringing outside investment into the Park was instigated by the Council and included outside bodies including English Heritage, Natural England, The Environment Agency, Commercial Enterprises, Community and Environmental Volunteer Groups to name but a few.
- 2.41 The total amount invested over a 10-year period from 1995 to 2005 amounted to approximately eight million pounds worth of investment to this Park alone.
- 2.42 It was an outstanding achievement by experienced Councillors and Officers at the time both who worked closely together as a unit for the betterment of Danson Park.

- 2.43 The Official Royal Visit to the London Borough of Bexley - The crowning accolade was the official visit by our late Queen Elizabeth II in 2005 to officially open the Danson House (renamed by English Heritage).
- 2.44 The official car with Her Majesty the Queen and her Lady in waiting, travelled through the Park via the North Lodge entrance and up the tree lined avenue which was planted in 1938 to commemorate the Coronation of King George VI. (Our late Queen's father.)
- 2.45 This was lined with 1,000 school children including additional staff and volunteers, what a magnificent sight this was at the time. Our civic leaders and residents alike were bursting with Civic Pride at this amazing Royal Visit.
- 2.46 Three of the maintenance staff were introduced to Her Majesty in the Danson House where we all chattered about the historical Park, the size, usage and the earliest starting time (3.00 am for all of us, if I recall).

3. Environmental Matters

- 3.1 London in Bloom - Over fifty years the Council had participated in the London in Bloom Competition, at least forty-nine years' worth of awards were conferred on Danson Park and the whole Borough.
- 3.2 Danson Park won the Best Park in London in 2009/10. The first winner of this new category, the then London Mayor Mr. B Johnson visited to congratulate the Council and staff.
- 3.3 The Friends of the River Shuttle Volunteers (Thames 21 initiative) who now are maintaining the Old English Garden to a high standard have re-joined the Britain in Bloom Competition (incorporating the London in Bloom section) scheme now run and managed by the Royal Horticultural Society. Awards have been achieved by the group over the past few years.
- 3.4 Green Flag Awards - The prestigious Green Flag scheme was created originally by the Department for Levelling Up, Housing and Communities and Local Government and managed by the Civic Trust (1996 to 2009) and started in 1996 to evaluate the top-ranking parks in the British Isles, this is now managed by the Keep Britain Tidy Group.
- 3.5 Danson Park was entered into the scheme in its second year in 1998 and obtained the award for 9 years.

- 3.6 The reason that Danson Park was not entered in the first year was that major building works were underway at the Stable Block area and the planned renovation of the Mansion would start following the completion of the Stable block. Hall Place entered and became one of the first seven winners out of forty-eight entries in 1997.
- 3.7 The Green Flag award scheme is still running but unfortunately the Council decided to retract from this national scheme in 2007/8. The reduction in budgets and staffing of the Parks and Open Spaces Department was the main reason for declining further applications.
- 3.8 There is an exception with Lesness Abbey in the North of the Borough this has been re-entered owing to a condition of the Heritage Lottery Funding requirement.
- 3.9 An Environmental Jewel in the centre of the Borough - London Borough Bexley Environment Awards - The Council organised and ran an Environmental Awards Scheme with a wide range of categories. Involving the majority of the Borough Schools, and including Public and Private Organisations. This was created and lead by the late Councillor Mrs Anttingbring, and other forward-thinking Councillors, to promote excellent environment practises by various groups and organisations employed mainly on a voluntary basis.
- 3.10 Danson Park was an award winner every year, some years these were multiple awards with various groups including the Friends of Danson Park, H M Probationary Service (Community Service) directed by the Parks Ranger Service in the former Works and Contracts Department for a minimum of a 15-year period.
- 3.11 This was sponsored by numerous private enterprise organisations including Turfsoil Ltd (Grounds Maintenance Company) and the Waste Management Companies who managed our award-winning recycling initiatives and contracts.
- 3.12 A tremendous amount of work has been undertaken over many years with regards to the overall management and long-term goals to maintain to an acceptable level of support for the good of the diverse type of fauna and flora in which the majority flourish in this well managed Public Park environment.

- 3.13 The creation of a dedicated nature reserve, some years ago at the Westerly end of the Lake includes a wetland area. This helped to capitalise on the water management and to provide a safe haven for the diverse types of wildlife.
- 3.14 Close liaison with the L B Bexley's Environmental and Tree Officer the Environment Agency, Thames Water and the Friends of Danson Park are working together to ensure that the environment issues are maintained and improved. This includes working with the Outdoor Recreation Department Water Sports Centre to enable safe sporting activities to be undertaken on the Lake.
- 3.15 Environmental Damage to be inflicted on this area of Danson Park/Area -
The proposal to remove four established urban gardens is a travesty in itself and to propose that there will be very deep excavations over the site during the construct to the depth to some five to six metres in is an absolute environmental crime.
- 3.16 The adjacent property at number 10, Danson Road have in their rear garden several trees growing close to the proposed site this includes a magnificent Copper beech tree specimen close to the existing boundary. This will, over time, without doubt, die. This will also apply to the other trees adjacent to the site.
- 3.17 There are a group of Balsam Poplar trees at the rear of the proposed development site this type of planting was encouraged by the Government of the day to give a quick lift to the devastated Parkland following the Dutch Elm disease crisis. It is to be noted that over 9,000 English Elms were removed by felling and clearing.
- 3.18 These existing trees and other trees in the area will without doubt suffer and die once the water table levels lower after development.
- 3.19 This is back garden destruction on a grand scale, and it is astounding that plans have been drawn up to include this level of devastation. Has no one in the Planning Department questioned the reasoning behind it all?
- 3.20 The original consultation and planning application made no reference to this basement construction. This will bring about a drying out of a wider area than the proposed site. The soils at this point are a London Clay overlaying on a Blackheath Gravel bed. Further in the park on the former

Pitch and Putt course the London Clay overlay was discovered to be at a depth of 21' feet.

- 3.21 This proposed development will without a doubt have a catastrophic effect on the environment in this area of Danson Park and Danson Road.
- 3.22 There is a tendency to look at an area with clouded vision, it is to be noted that the Gardens at the rear of every property in Danson Road and Danson Mead are hosting a wide variety of plant species which are, at the moment, enjoying healthy growing conditions.
- 3.23 These quintessential "English Gardens", are mirrored in each individual garden and the owner's preferred choice of garden usage. Each one becomes a miniature cosmopolitan of different designs and consequently are brimming with a huge diversity of species which in turn hosts very large amounts of local visiting fauna and natural / exotic flora. This will include hundreds of thousands of microscopic bacteria and fungi and the like, these are all living in symbiotic conditions.
- 3.24 It should be said that all the rear gardens are a part of the whole ecological system that are linked directly to Danson Park they should not be viewed in isolation.
- 3.25 At the moment there are approximately four boundary hedges between the Park and individual neighbours, these alone make up some 200 metres in total length.
- 3.26 Any hedges that have existed over 60 to 80 years should not be undervalued. It is well documented that established hedges are a haven for wildlife and are needed to maintain healthy bird populations.
- 3.27 It is to be noted that there is no control of vermin in Danson Park. Certain Carrion species, parakeets and mammals are left to increase without control. This is having adverse effects on all the small bird populations.
- 3.28 The overall green canopy, which now exist within these gardens have become a refuge for small birds and mammals to inhabit.
- 3.29 Bats species use these back gardens as a flight corridor to feed and return to their roost's (exact positions are unknown to me at present, but they are defiantly in this area).

4. Landscaping Design (Proposed)

- 4.1 There cannot be any amount of post Landscaping to the remaining areas after the building works have been completed to compensate for the loss of these back gardens, existing trees and hedges. Any person at this Inquiry that says otherwise is deranged and to challenge this will be futile.
- 4.2 On all sites laid out to a Landscape plan these are always subjected to non-completion. If the building budget over runs (normal in this industry) the first item on all developer's minds is the building and not the green asset, which is always secondary.
- 4.3 Over time the landscape maintenance is reduced on an annual scale because managers and the like cannot see the value of this benefit. The building structure and its ever-draining maintenance budget.
- 4.4 With regard to the Environmental Screening Document which was sent to the L B Bexley by the Secretary of State Environmental Services Department on 28th October 2022, I believe this was requested by the Appellant and the Council during the completion of their joint statement of Case. What did they ask and has this gone through the Inspector?
- 4.5 Did Mr. Joseph Briody, EIA and Land Rights Advisor, work on a Desk Top exercise and on information provided by the two parties? This is a very suspicious in both its delivery and its timing.
- 4.6 The screening document mentions Oxleas Wood - Why? I will challenge this and the associated notes will be made available to the Inspector.
- 4.7 There is no mention of Danson Park's own Nature Reserve (one of only two in the entire Borough).
- 4.8 The photographs used by the Appellant are now out of date.
- 4.9 It is to be noted that there were no comments acknowledged from the Parks and Open Spaces Department in the Planning Committee Reports. On inspection of the representations, provided by the Council on the 21st November 2022, the representation from the Parks and Open Spaces Department suggests they sent their comments on the proposed development back in 2019. These comments are not present in the document (CD4.18 Parks and Open Spaces comments) and have not been provided by the Council.

- 4.10 The Committee report (18th November 2021) notes that there were 'no objections – subject to conditions' from the Parks and Open Spaces Department. These comments, or lack thereof, are suspicious by their absence.
- 4.11 All the very experienced Officers with Horticultural and Environmental expertise with long term service have now left the Council and the existing staff has been forced to take on additional roles within the organisation.
- 4.12 Therefore, they have not the time or experience to make any comment on this proposed destruction of the green environment and the comments they have made have not been considered.

5. Conclusion

- 5.1 Please do not downplay the importance of PARKLAND, its usage and the overall Environment Asset. The Green Stuff is needed more and more owing to the ever over development of the Borough. There are now a greater number of residents that are being corralled into flats who will need access to parks and open spaces as they do not have their own gardens.
- 5.2 In some of my initial letters to all the three Local MP's, all the Town Planning members and their substitutes, immediate Ward Councillors in Crook Log and Falconwood and Welling. It is to be noted that the Leader of the Council Baroness Councillor T O'Neil is a Crook Log representative and does not support the Planning Officer's plans.
- 5.3 All of the above have received my objections and complaints including the Danson Neighbours Residents' Group. I must point out to the Inspector that I do not like to be called either a Complainant or Objector.
- 5.4 I did write and suggested that if this type of Care or Nursing home is desperately needed then perhaps it would be better built around the site at Queen Mary's Hospital Sidcup. This would bring together four organisations for the better provision of service to the wider Community, L. B. Bexley, Area Health Authority, NHS England and Private Enterprise. This would, in my opinion, be a first in the way forward in Community Care.

6. Supporting reports

- Bexley Civic Society
- The Garden Trust
- English Heritage
- L B Bexley Environmental plan (superseded by the Climate Change Statement)
- Climate Change Statement