

**APPEAL BY CAREBASE AGAINST THE REFUSAL OF PLANNING
PERMISSION FOR DEVELOPMENT AT 2-8 DANSON ROAD,
BEXLEYHEATH**

**PROOF OF EVIDENCE OF STEVEN HANDFORTH
IN RELATION TO HERITAGE MATTERS**

**INSPECTORATE REF: APP/D5120/W/22/3293225
LPA REF: 19/03072/FULM**

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1.0 Qualifications and Experience

1.1 I am Steven Handforth BA (Hons), MSc, IHBC. I have a Master's degree in Historic Building Conservation with distinction, and I am a full member of the Institute of Historic Building Conservation. I currently run my own heritage practice having worked previously for over sixteen years' in the public, private and charity sectors. I have direct experience of working as a conservation officer, having previously worked at Walsall Council and Westminster City Council. I have extensive experience of providing heritage advice in the historic environment and have acted as an expert witness at many Hearings and Inquiries.

1.2 I have undertaken numerous significance and impact assessments where I have analysed the impacts new developments will have on the historic environment. This work includes dealing with physical impacts, setting, townscape and view assessments. I have worked on various schemes across London, including Islington, Camden, Westminster, Tower Hamlets, and Hackney. Many of the projects I am involved in include complex heritage issues that require a detailed understanding of the significance of a place to inform its capacity for change without harming its core values.

1.3 Some examples of projects I have been involved in and helped gained planning permission for include:

- Woodcote Grove, Epsom: New residential development in the Chalk Lane Conservation Area, adjacent to the Grade II* Mansion and Grade II listed stable block;
- 160-164 Hurlingham Road, Hammersmith and Fulham: Demolition and reconfiguration of a locally listed stable block for a part 5, part 4 and part 2 storey building providing office and flexible retail/cafe floorspace.
- 268-282 Vauxhall Bridge Road, Westminster: The demolition of 19th and 20th century historic buildings and construction of a new hotel comprising 137 keys and replacement housing, adjacent to the setting of the Westminster Cathedral Conservation Area;
- 1-7 Foxley Lane, Purley: Provision of 39 new units in the setting of a Grade II listed library;
- Berkhamsted School: The provision of a new Sixth form centre to Berkhamsted School, requiring the demolition of positive buildings in a conservation area adjacent to the Grade I listed school house

- 132 Station Road, Haringey: Construction of 6 new dwellings in a highly sensitive location within the Wood Green Conservation Area.

1.4 I understand my duties to the Inquiry, to provide objective and independent evidence, based on my own professional opinion. I confirm that the facts stated within this proof are true and that the opinions expressed are my own.

1.5 The purpose of my evidence is to provide an assessment of the identified heritage assets in accordance with the requirements of the National Planning Policy Framework. My evidence then provides an analysis of the potential impacts of the scheme and a critique of the Council's reasons for refusal and officer's report. My evidence will demonstrate, in accordance with the original heritage statement submitted with the planning application, that the proposals would not harm the significance of any identified heritage assets.

2.0 Introduction and Scope of Evidence

Introduction

- 2.0 I was commissioned to undertake an independent heritage assessment of the appeal scheme by Carebase Ltd. in September 2022 following the London Borough of Bexley's (LBB) decision to refuse planning application reference: 19/03072/FULM. The description of development for the appeal proposal reads as follows:

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.

- 2.1 The site is located within Bexleyheath in the Greater London urban area, and is currently occupied by two pairs of large semi-detached properties with front drives and rear gardens featuring some ancillary structures. The site is located just outside the north eastern entrance to Danson Park, which is a Grade II Listed Registered Park and Garden (RPG). Within this RPG is the Grade I listed Danson Park Mansion (approximately 390m south west of the site) and the Grade II* listed Stables to Danson Park (approximately 300m to the south west of the site).
- 2.2 The houses on the site appear to have been constructed *circa* 1946 (as evidenced in historical aerial photography in Appendix 1) and are typical suburban houses with gabled frontages found along Danson Road and the surrounding urban area. The indicative site location shown in the context of the nearby heritage assets is shown in Figure 1 of my Appendix 1.
- 2.3 The full planning application for the proposed development was submitted to the LBB in December 2019 and was accompanied by a numerous documents including a Heritage Statement by Architectural Management and a Design and Access Statement by Ryder Architecture.
- 2.4 The application was reported to the Planning Committee in November 2021 with an officer's recommendation for approval. The report concluded that:

On balance, it is considered that the proposal would deliver a high quality contemporary design which would provide a meaningful contribution to the street scene without harming the existing character and appearance of the locality.

- 2.5 Notwithstanding the officer's recommendation for approval, the application was refused and decision notice dated 30 November 2021. Six reasons for refusal were provided. This proof of evidence will focus on reason number 4 which specifically relates to heritage matters.

Scope of Evidence

- 2.6 My evidence will focus on the main heritage consideration in relation to whether the appeal scheme will preserve the significance of the Grade II listed RPG. It responds to the Council's fourth reason for refusal, which reads as follows:

The proposed development, by reason of the position, height, bulk and scale would harm the setting of and result in less than substantial harm to, Danson Park, a Grade II Registered Park and Garden and designated heritage asset. It is not considered that this harm would be outweighed by the public benefits required by paragraph 202 of the National Planning Policy Framework (2021). The proposed development is therefore contrary to policy HC1 of the London Plan (2021), CS07 and CS19 of the Bexley Core Strategy (2012), saved policies ENV39 and H3 Bexley Council Unitary Development Plan (2004) and Paragraph 199 and 202 of the National Planning Policy Framework (2021).

- 2.7 The council's first reason for refusal alleges harm to the character and appearance of the area. This topic will be addressed by Mr Jon Etchells in his Proof of Evidence.
- 2.8 Included under separate cover, are my appendices, which include Appendix 1: Figures, Appendix 2: Plates and Appendix 3: List Descriptions.

3.0 Heritage Legislation, Policy and Guidance Summary

3.0 In addition to relevant council local planning policies, the key material considerations relevant to this appeal in relation to heritage include:

- The Planning (Listed Buildings and Conservation Areas) Act 1990
- The National Planning Policy Framework
- The Planning Practice Guidance
- The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning: 3 (2nd Edition)
- Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12.

3.1 The appeal site is located immediately adjacent to the Grade II listed Danson Park RPG, which contains the Grade I listed Danson Park Mansion and Grade II* Stables to Danson Park. Whilst the appeal scheme would not have any direct physical impacts on any heritage assets, it does have the potential to affect their significance through impacts on their settings. In relation to listed buildings, Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 is relevant here, and states:

In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

3.2 In relation to the term 'preservation', the *South Lakeland v SSE* [1992] judgment clarified that this equates to causing 'no harm'. If harm is identified, considerable importance and weight needs to be given to the desirability of preserving the significance of these heritage assets in accordance with the *Barnwell Manor Wind Energy Limited v East Northamptonshire DC, English Heritage, National Trust and SSCLG* [2014] judgment.

3.3 Notwithstanding this, the council has not identified any harm to the setting or special interest of the listed buildings, which was a view shared in the original submitted heritage statement. Following an assessment of the site and surroundings, I am in agreement with this view. As such, these heritage assets will not be discussed in detail within this proof, with the exception of their relationship with the RPG.

3.4 Unlike listed buildings, the setting of the RPG is not enshrined in law. It is however a material consideration as highlighted within the NPPF.

3.5 The NPPF identifies four principal elements of significance:

- architectural interest,
- historical interest,
- archaeological interest and
- artistic interest.

3.6 In relation to setting, the NPPF states that this is:

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.

3.7 The approach to assessing setting has been outlined in Historic England's guidance document *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning: 3* (2nd Edition). The guidance advocates a five stepped approach to assessment:

- Step 1: Identify which heritage assets and their settings are affected
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it

- Step 4: Explore ways to maximise enhancement and avoid or minimise harm
- Step 5: Make and document the decision and monitor outcomes

3.8 In relation to step 3, paragraphs 201 and 202 the NPPF advise on the two levels of harm that are possible in relation to impacts:

201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

(a) the nature of the heritage asset prevents all reasonable uses of the site; and

(b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

(c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

(d) the harm or loss is outweighed by the benefit of bringing the site back into use

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

3.9 The Planning Practice Guidance (PPG) states that substantial harm is a high test and provides the following example:

...in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

4.0 Historical Background

- 4.0 A considerable number of histories of Danson Park and the buildings within it have been published over time. The most definitive and key source material however comes from English Heritage's *The House and Park at Danson* (2000). For the purpose of this proof, this report has been supplemented by other secondary and primary source materials including maps, drawings and photographs where relevant.
- 4.1 Whilst records relating to Danson go back to the 13th century, the earliest records that record anything close to resembling an estate date to 1571, when the Danson estate, then known as 'Dansington' was purchased by Matthew Parker, the son of the Archbishop of Canterbury. A survey of Bexley Manor dating to 1608 describes Danson as consisting of approximately 180 acres of wood, pasture and arable land, and nine acres on which the house and farm buildings were located (Public Record Office, LRJ2/218 20-58. Copy in Bexley Local Studies, MAN. 1608).
- 4.2 An estate plan dating to 1684 shows that the land was owned by John Adye of Gray's Inn, and the 'Mannor of Danson' occupied an area that roughly corresponds to the outline of Danson Park today, running between Danson Road to the east and Danson Lane to the west. The size of the park appears to have reduced in size by this point, with the total area recorded as 146 acres. The 'Mannor House' and ancillary structures at this point were located along the eastern boundary of the estate to the east of the existing lake.
- 4.3 In 1695 Francis Styleman took the estate in trust for his brother on a 200 year lease (Bexley Local Studies, Danson Leases, D13, dated 8 June 1697). During this period the park encompassed 250 acres and was ornamented by ponds, springs and canals. By 1723 Styleman leased the property to John Selwyn, who was restricted on cutting down trees on the estate which had been severely depleted by this point (Bexley Local Studies, Danson leases, D32 and D32b, dated 20 September 1723). Selwyn did however expand the Park, buying numerous additional parcels of land throughout his time there and ultimately establishing the line of Danson Road to the east having had it relocated further away from his house.
- 4.4 One of the most important historical figures of the Danson Estate, was John Boyd, who acquired Danson in 1753 and finally purchased it from the Stylemans in 1759 (R. White, *Danson Park, Bexley*, p. 53). Over the following years Boyd slowly expanded his estate, before acquiring the park land on which the current Danson House is located in 1762.

- 4.5 Circa 1762/1763 Boyd appointed Nathaniel Richmond (figure 2) to draw up a scheme for a new park at Danson (*The House and Park at Danson*, Lea, R & Miele, C, English Heritage, 2000). The house was eventually constructed on the highest part of the hill and designed by Robert Taylor between 1762-70. Although the park still retained stables and offices to the east of the Park, in 1765/66 he constructed replacement structures in the form of wings to either side of the main house connected by quadrant walls (figure 3). Robert Taylor was a leading Classical architect of the period and had worked on Boyd's London home at No. 33 Upper Brook Street in Mayfair. Another eminent architect of the period, William Chambers also played a significant role in the design of the interiors of the main house and designed some ancillary buildings within the grounds, including an ornamental bridge to the west of the lake, and Grecian temple on the eastern edge of the lake (figures 4 and 5). It is also possible that he designed the scroll pediment above the entablature of the main entrance which is identical to the vaulted entrance of the Strand block of Somerset House in London which he designed.
- 4.6 By 1781 Boyd had purchased the entire area south of the lake, enabling him to extend the park to its final form. Within this plot of land was the 'chapel house' on Blackfen Road (figure 8 and 10). This structure survives largely intact today, albeit its setting has been completely eroded by its physical separation from the park and by the construction of the A2. Evidence of a classical gate lodge can also be seen on the historic maps in the north west corner of the park, a drawing of the structure survives and dates to 1800 (figure 9).
- 4.7 In 1805 John Johnston purchased the Estate and it was held by his family until 1865. John Johnston undertook several changes to the main house, the most considerable of which was the demolition of the wings. The facing stones from these wings were reused in the present stable block, including four rusticated arches, during its construction circa 1802-1804. An estate plan dating to the mid-1820s showed that he altered the landscape considerably, particularly to the north of the house with extensive tree planting which enclosed the house to a far greater degree than it would have been in the 18th century (*The House and Park at Danson*, Lea, R & Miele, C, English Heritage, 2000). This ultimately removed views of the house's principal façade from the Dover Road to the north.
- 4.8 The tithe apportionment of 1839 and map of 1844 records John's wife Anna as the owner and occupier of the house and a vast quantity of land around it, although some parts of the estate were leased (figure 6). The map shows that the meadows north and south of the lake, and are described as 'Part of park' and as such would be core parts of the estate.
- 4.9 Access routes to Danson Park Mansion are not clearly visible on the tithe map, although we know there was an entrance lodge to the north west of the site (figure 6 and 9). The 1897 OS map shows

two main approaches with accompanying gate lodges, one from a western lodge on Danson Lane, and one from an eastern lodge on Danson Road. There are no other access routes shown on this plan. The north east corner where the appeal site lies, shows a tree plantation which may have been used to conceal any views of the toll booth on the turnpike road.

- 4.10 The next notable owner of the estate comes in 1862, when Alfred Bean, a railway engineer, bought the park. Bean's firm had been involved in the construction of the North Kent Railway and the Sidcup line in 1866. In the early 1880s his firm also promoted a rail line taking in Welling on a route between Dartford and London. This loop greatly encouraged the development of the area into what would eventually become a modern commuter suburb (*The Rise of Suburbia*, ed. by F.M.L. Thompson, Leicester: The University Press, 1982). Large areas of the park were given over to suburban housing, but the house and about 220 acres of the estate remained undeveloped after his death.
- 4.11 Bean undertook numerous upgrades to the main house including the introduction of iron to enlarge window openings and strengthening floor timbers. He also completely Victorianised the Georgian interiors of the building, although a considerable amount of the original fabric was left untouched. Bean died in 1890 and his wife took over the estate before dying in 1921. The land was eventually sold to Bexley Urban District Council in 1924 and the park was officially opened to the public in 1925.
- 4.12 One of the first significant interventions in the park, came with the cutting of a new entrance way to the north east corner of the park off Dover Road. A new set of gates were constructed by a local firm (Edwards of Dartford) and made of beaten and wrought iron with copper shields bearing the arms of Bexley UDC. The stone piers are constructed in artificial darkened Portland stone and were made by Thomas & Edge, Woolwich. The entrance was officially opened on 22 March 1929 (*The Recorder for Hale, Bexleyheath and East Wickham*, no. 1, March 1929).
- 4.13 It was during this period that the historic appearance of the park changed considerably. The council had been keen to promote areas of the park for sport, and in turn constructed a football pitch, tennis courts, a bowling green, and athletics facilities. An open-air swimming pool was built to the south near to the A2 (Rochester Way) in 1936. Between 1944 and 1963 part of the stable block was used as a sports changing room. A 1946 aerial map provides a useful evidence of the significant impact these municipal changes had on the appearance of the park (figure 11).
- 4.14 The next noticeable additions occurred in the 1950s and 60s with the construction of the Hall Place Garden and Rock Garden. The boat house and cafe were complete in 1964 and purpose built

dressing room and toilet block in 1965. Whilst these structures all eroded the Georgian character of the landscape, they provided public benefits to visitors of the park.

- 4.15 The Mansion House became a registry office and wedding venue in the early 2000s. The stable block was converted to a pub in 1997 and has undergone numerous restorations since then. The provision of extensive hardstanding to accommodate parking has had a negative impact on the 'green appearance' of the park.
- 4.16 Today, all the ornamental buildings of Boyd's park have now gone, including William Chamber's bridge and Grecian temple. None of the original gate lodges that were constructed in the 18th and 19th centuries have survived. The only ancillary historic structure that remains is the Chapel House, which is now located outside of the site and has been physically separated from it by the A2 road (figure 12).

5.0 Identification of Heritage Assets and Significance Assessment

5.0 An inspection of the relevant databases and sources, including the Historic Environment Record (HER), the National Heritage List for England (NHLE), and the Council's website, has identified numerous Heritage Assets lying within the vicinity of the Site. Following desk based research and on site analysis, professional judgement has been used to identify and select Heritage Assets whose significances may be affected by changes to their settings or direct impacts.

5.1 This assessment has been undertaken in accordance with Historic England's Statement of Heritage Significance: Analysing Significance in Heritage Assets and Historic England 's Advice Note 12 The Setting of Heritage Assets GPA 3. In accordance with Paragraph 194 of the NPPF the level of detail is proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

5.2 The assessment has also been undertaken having reviewed the council's officer report and previous heritage statement submitted with the planning application. Subsequently I am in agreement with their findings and have identified one Heritage Asset that has the potential to be affected by the proposals through impacts on its setting:

1. Danson Park Registered Park and Garden, Grade II

5.3 Several other Heritage Assets were identified as part of this process but were excluded from assessment due to either a lack of visible or experiential connection with the site.

5.4 The following section provides an assessment of the significance of the identified Heritage Asset including what contribution it setting makes to this.

5.5 The list entry for the RPG is included within Appendix 3 for reference. As both the Grade I listed Danson Park Mansion and Grade II* Stables to Danson Park are included within the RPG, their descriptions have also been included for completeness.

Description

5.6 The size of the park has evolved and changed overtime. In its current state, the park is considerably smaller than its peak of 600 acres, although it still covers a considerable 182 acres (approximately).

The park features numerous entrances, some vehicular but the majority pedestrian. Many of these entrances are utilitarian in appearance and feature plain metal railings or brick piers. Some architectural thought has been given to three of the principal entrances, namely the north eastern corner off Danson Road, the north western entrance from Danson Lane and the eastern entrance off Danson Road. The latter two entrances are on historic routes and can be seen on the 1873 and 1897 OS map. The north eastern entrance was a later addition, being installed as part of the metropolitan works undertaken in the 1920s.

- 5.7 The park has a considerably mixed appearance. The Georgian elements of the park remain in the Mansion and associated Stable Block, albeit with new landscaping to their immediate settings (plates 1-3 and 6). The topography of the land, especially to the south is also consistent with its historic origins, with the Mansion commanding views over the gently rolling hill towards the lake (plates 4 and 5). This lake now has a relatively informal appearance, with overgrown vegetation lining its banks (plate 5) and marina to the east. This is in contrast to the more picturesque appearance of the 18th and 19th centuries (figure 4).
- 5.8 Notwithstanding these elements, the park's overriding character is a municipal one. This is particularly the case to the north, where there is a bowling green with modern bungalow and tennis courts (plates 7 and 8). To the west, the prevalence of hardstanding for parking and the nursery has further eroded the historic character of the park (figure 12). The rest of the park is dominated by large swathes of woodland and large open fields that provide views across the park to the Mansion (where not screened by trees) or to the urban 20th century surroundings.

Significance

- 5.9 Due to its sheer scale, the RPG is clearly not of equal significance throughout. In my professional view, the elements of the park of most significance are the listed mansion and stables, their relationship to one another and the lake to the south. Although the significance of these elements can be appreciated from a number of viewpoints around the park, many of these have been disrupted by modern interventions. The tennis courts to the north of the park for example are not a typical feature of an 18th century country estate and give this section of the park a much more municipal feel.
- 5.10 Whilst municipal characteristics are not necessarily of any lesser interest than other types of character, it is my view that the RPG is primarily listed for its two listed buildings and the remnants of the 18th century designed landscape, rather than the later interventions by the council and surrounding suburban housing. The municipal additions were necessary to safeguard the future of

the park and the buildings, but they receive little attention within the official list description (Appendix 3).

5.11 By virtue of its Grade I listing, Danson Park Mansion is a building of outstanding architectural and historical significance. It is a fine example of a mid-18th century Palladian rural retreat, and its grouping with the slightly later Grade II* stable block is of considerable importance. The landscaped setting of the listed buildings, and particularly their relationship to the lake, is a key element of their special interest.

5.12 The Council acknowledged this within their committee report in paragraph 2.30:

The committee report for the proposal notes that the most important features identified within the listing are located either centrally within the site or further south (i.e., Danson House; Danson Stables; the main (eastern) entrance; the old English garden; and the lake).

5.13 The list description for the RPG also states:

Little of the original parkland survives to the north and west of The Mansion.

It goes on to state:

Much of the C18/C19 park and woodland surrounding The Mansion has been lost to sport facilities which include tennis courts and playgrounds created since 1924.

5.14 Section 4 of this proof has demonstrated that the park has changed considerably over time, with many of its original and historic features now being lost or physically separated from the park. Indeed Pevsner comments:

The park now looks a little bare, with its second hand generation trees, and large, rather uncompromising lake. The park boundary too is now marked by all too visible semi-detacheds (The buildings of England, London 2: South, Pevsner, N, 1983).

5.15 Part of the interest of the park is that it has evolved over such a long period, with structures being constructed at different times, many of which provided a positive new layer to the park's interest and history. We know for example that the current stable block was constructed some forty years after the original house. Its location further away from the house reflects the fashion and tastes of the period. The reuse of the existing stonework also shows the ingenuity of the architect, believed to be George Dance the younger.

- 5.16 Similarly whilst many of the metropolitan improvements to the park have had a detrimental impact on its historic appearance, they did enable public access to the space, and key parts of the park appear to have been preserved and celebrated.
- 5.17 In relation to the north west entrance which sits adjacent to the site, the list description makes one small reference to this:
- On the east side of the Old English Garden a drive, now a tarmac footpath, passes through former parkland and connects the C20 Crook Log entrance with the main drive. This was the main entrance to the municipal park and is marked by ornate iron railings and gates.*
- 5.18 The RPG is therefore considered to be of architectural and historic significance for its retention of highly Graded listed buildings by named architects and for the surviving elements of its Georgian landscape, namely the gently sloping topography of the land that leads to the substantial lake to the south.

Contribution of Setting to Significance

- 5.19 The setting of the RPG completely changed during the course of the 20th century, moving from a rural context to a highly urban one (Figures 8 and 12). The park is enclosed by the A2 dual carriageway to the south, Danson Road to the east, the A207 to the north and a mixture of less busy residential streets to the west. Where modern 20th century development is present, these have generally been omitted from the RPG boundary, although some isolated 20th century development is located within the park.
- 5.20 The majority of buildings in the surrounding area are of a variety of styles, but generally consist of large semi-detached or detached inter-war suburban villas with gables, pitched roofs and bay windows. They are typical metro-land buildings of no particular architectural or historic interest. On the whole they are constructed in standardised materials including brick or rendered walls and clay or concrete roof tiles (plates 15,17, 21, 23, 25, 26 and 27). All these buildings are considered to provide a neutral contribution to the setting and significance of the RPG. The busy A2 road to the south is considered to be a negative element of the RPG's setting and detracts from its significance.
- 5.21 In terms of the appeal site's specific contribution to the significance of the RPG, it is located along a busy thoroughfare and flanks the southern edge of a narrow, funnel like entrance (plate 9) designed in the 1920s. The site is approached via the corner of where the A207 and Danson Road

meet. This entrance has a municipal character, and is framed by a mixture of garden footprints (south and north) and No. 1 Danson Mews' flank wall (to the north). The appeal buildings themselves (Nos. 2, 4, 6, and 8 Danson Road) are of no heritage significance.

- 5.22 The site forms part of this 'funnelling' of visitors into the park, before the openness of the park opens up beyond the western end of the rear gardens of No. 2 Danson Road. This part of the park has a less elegant character with the rear boundary treatments of properties along Danson Mead and Danson Road providing a disjointed boundary to the edge of the park. The majority of the site provides a neutral contribution to the RPG's setting whilst its rear boundary and outbuildings have a run-down appearance that detract from the park aesthetically (plates 11 and 12).
- 5.23 The current setting of the RPG is therefore mixed, and largely either neutrally or negatively contributes to its significance.

6.0 Proposals and Assessment of Impact

- 6.0 Details of the appeal proposals can be found within the drawings and Design and Access Statement (DAS) submitted with the original planning application. Ms Bryan and Ms French's evidence will also provide further details on the rationale behind the design, scale and massing of the appeal proposals.

Proposals

- 6.1 The proposals seek to demolish Nos. 2, 4, 6 and 8 Danson Road, and replace them with a part 1/2/3 storey building to provide a 70 bedroom care home with associated access alterations, car and cycle parking, landscaping and amenity space. The proposed building is a bespoke design which has been developed to specifically address its location, with high quality materials including red and red/ brown facing bricks, masonry window surrounds with mullions, and grey or dark red/ brown standing seam zinc for the roofs.
- 6.2 The design of the proposal consists of two typologies, one that addresses the street frontage along Danson Road, and one to address the park entrance which runs along the north side of the site. The Danson Road frontage consists of four elements incorporating pitched roofs, reflecting the existing arrangement of houses in the street. The northern elevation is set back from the boundary hedge and away from the main body of the park at the western end of the site. Currently there are a collection of unattractive, run down garden structures within the site that directly front onto the park.
- 6.3 The new building is generally two storeys in height (with additional lower ground floor in places), with a three storey element at the northern end of the Danson Road frontage. As a result of the shallow roof pitches however, the new building would only be nominally taller than the existing houses along Danson Road.
- 6.4 The footprint and volume of the new building would be greater than the existing houses. The bulk of the building has been carefully considered though a thoughtful consideration of its form, elevations and materials, which give it a light appearance. A considerable proportion of the building would also not be visible from outside the site.

- 6.5 The design has been developed in to complement the surrounding area, without replicating existing house typologies which are of no particular architectural merit. The design is bespoke and has been specifically developed in response to the site constraints.

Impact

- 6.6 The council's officer report provided comments on the scheme:

The massing of the proposal has been designed to break up the visual mass along Danson Road. The frontage, while a single building, would be well articulated and reflect the residential character.

And:

On balance, it is considered that the proposal would deliver a high quality contemporary design which would provide a meaningful contribution to the street scene without harming the existing the character and appearance of the locality.

- 6.7 I am in agreement with the original heritage statement's and council officer's conclusions that the proposals would not cause any harm to the significance of the listed Mansion and Stable Block. The appeal site is experientially and visually separate from these listed buildings and is located within a part of the park that has already been considerably impacted upon by the 1920s municipal interventions. As such, paragraphs 201 and 202 of the NPPF would not be engaged.
- 6.8 In terms of impacts on the RPG, the appeal site is immediately adjacent to it and within its setting. It should be noted that this part of the park has already been heavily altered when the municipal entrance was constructed through what was once a plantation.
- 6.9 The appeal proposal will involve a change to the setting of the RPG, but this change should not be considered harmful unless it has a negative impact on its heritage significance. Given the small nature of change when contrasted to the much larger heritage asset, and its remoteness from the most significant element of the RPG, it is my professional view that the appeal proposals would not harm the significance of the RPG.
- 6.10 In summary therefore, the appeal proposal will result in a small change to the setting of small section of RPG in a location of lower significance than its key component parts. As such, it is my professional opinion that the appeal proposals would cause no harm to the significance of the identified heritage assets.

Response to Reason for Refusal and Officer's Comments

- 6.11 The original Council officer's report recommended the appeal proposals for approval despite identifying a small degree of harm to the RPG. Notwithstanding this, this recommendation was overturned at committee and the following reasons provided for refusing the application from a heritage perspective:

The proposed development, by reason of the position, height, bulk and scale would harm the setting of and result in less than substantial harm to, Danson Park, a Grade II Registered Park and Garden and designated heritage asset. It is not considered that this harm would be outweighed by the public benefits required by paragraph 202 of the National Planning Policy Framework (2021). The proposed development is therefore contrary to policy HC1 of the London Plan (2021), CS07 and CS19 of the Bexley Core Strategy (2012), saved policies ENV39 and H3 Bexley Council Unitary Development Plan (2004) and Paragraph 199 and 202 of the National Planning Policy Framework (2021).

- 6.12 In relation to Policy HC1 of the London Plan, the appeal proposal does not cause harm, which is an objective of part (c) of that policy. Objective (g) of Policy CS07 emphasises the need to protect Danson Mansion and its Park and objective (d) emphasises that 'heritage assets and areas that are characterised by mainly semi-detached and detached family housing are retained'. Neither of these objectives are breached in this appeal. In relation to the non-heritage aspects of the policy, these will be addressed in the evidence of Mr Etchells. Policy CS19, specifically objectives (c) and (d), are not engaged as no harm is caused. Policies ENV39 will be dealt with by Mr Etchells and in relation to objective (3) of H3 I see no conflict.

- 6.13 Turning to the officer's report, the council provide very little information on why they actually believe the appeal scheme to be harmful from a heritage perspective (author's emphasis):

*The bulk, scale and mass of the development would increase over the current dwellings, however the tree and hedge lined nature of the access to the park and immediately behind the proposed development would help provide some screening and the set back from all boundaries fronting into the park aids to further reduce the visual impact of the development. **It is not considered that it would result in an overbearing visual impact to the entrance or the wider park.** The proposal would cause less than substantial harm and the justification for the proposal in both design terms and the benefit of a 70 bed care*

home for end of life and dementia care is considered clear and convincing and outweighs the less than substantial harm.

6.14 The report also include comments from the Gardens Trust who suggest that the appeal proposal:

will impose substantial harm on the setting of Danson Park

6.15 The PPG highlights that substantial harm is a high test. As my evidence has concluded, it is my view that the proposals would change the setting of the RPG, but only to a very small degree and this change would not strike at the heart of the significance of the park. As such, no harm would be caused.

7.0 Conclusion

- 7.0 The Danson estate has a long and extensive history, but its mansion, stable block and lake date mainly to the mid-to late 18th century. These elements were completed under the direction of Sir Robert Taylor, William Chambers, Nathaniel Richmond and possibly George Dance the Younger.
- 7.1 Historic map regression has shown that the scale of the park is considerably smaller than it was historically, and that many of its original built features, including temples, bridge and lodges have now been lost, eroding its historic character. Notwithstanding this, the survival of the Grade I listed mansion, which is of outstanding architectural and historical significance as an example of a mid-18th century Palladian country house, and its grouping with the Grade II* stable block is of considerable importance. The landscaped setting of these listed buildings, particularly in relation to their relationship with the lake, is a key element of their special interest.
- 7.2 This proof has demonstrated that the RPG is of varying quality, with the northern section having a much more municipal character. The setting of the RPG has been considerably changed since its early origins, now having a completely urban character, that does not contribute to the significance of the RPG.
- 7.3 The proposed appeal scheme has been sensitively designed to ensure it introduces a high quality development within the setting of the park, whilst ensuring the key significance of the RPG is maintained. As such, it is my professional view that the appeal scheme would cause no harm to its significance and would not be in conflict with the local heritage-related policies cited in the council's reasons for refusal of planning permission.