



Emma Hawkes  
DHA Planning  
Eclipse House  
Eclipse Park  
Sittingbourne Road  
Maidstone  
ME14 3EN

18 March 2019

Dear Ms. Hawkes

18/505443/PAMEET

**SITE:** Broughton Mount  
**PROPOSAL:** Pre-Application Meeting (ON-SITE) - Residential Re-development

I refer to your pre-application request dated 18 October 2018 seeking the views of the Planning Authority in relation to potential residential development options at the above site.

The submission was accompanied by a Heritage Advice Note, Design Document, Structural Report and a Phase 1 Habitat Survey.

**Proposal:**

As set out in your covering letter, DHA has looked in detail at the feasibility for options for the site's redevelopment and various layout options have been sketched out. The two feasibility options enclosed incorporate 33 or 46 dwellings on the site and these options are included for further discussion.

**Relevant Planning History:**

00/0709

Change of use from agricultural buildings to craft workshops, telesales centre, gallery and tea room (including uses within classes A1, A3, B1, B2 and D1) and additional car park, as shown on drawing nos. P2, P3, P4, P5, P6, P7 and P8 received on 14.04.00 and as amended by drawing no. P1 received on 28.04.00.

Approved  
30.06.2000

61/0130/MK3

Demoilition of existing house and erection of new buildings for use as a training centre and residential accommodation.

Approved  
30.01.1962

### **Assessment:**

The scheme relates to a housing allocation H1(52) at Boughton Mount, Boughton Monchelsea. The site is allocated in the Local Plan for approximately 25 dwellings at an average density of 14 dwellings per hectare. Criterion 1 of the allocation policy outlines that the developable area of the site is approx. 1.8ha and that development would be restricted to the currently developed area to the north of the Ha-Ha and Folly and will exclude the area of the existing pond.

You have presented two proposals at the indicative stage, one being for 33 dwellings and the other being for 46 dwellings on the overall site. The options incorporate a mix of unit types and sizes including 1 or 2 bed flats in the existing tower and barn, as well as 2 to 3 bed terraced units, 3 to 4 bed semi-detached and detached dwellings and 4 to 5 bed link detached dwellings. Each of the schemes incorporates a courtyard mews as well as reinstatement of the gateway house.

Development appears to be predominantly confined to the northern section of the site, however, option 1 does include development around the pond area which you state is for feasibility reasons.

The site is located in the countryside as defined by the Maidstone Borough Local Plan. Originally the site was the location of a large country house and the site was more recently a disused former KCC site. Special educational services were provided on site from the late 1940s until around 9-10 years ago.

The northern half of the site consists primarily of disused educational and horticultural buildings as well as hard standing for associated car parking. The southern half of the site consists of the overgrown private gardens associated with the former residence. The site includes a number of listed and non-designated heritage assets. These factors have both defined the extent and scale of development within the site allocation.

The key characteristics of the wider area are of a rural area with orchards, large intensive arable fields, narrow hedge linked lanes, agricultural barns and traditional vernacular style buildings at Boughton Mount.

### **Principle**

#### House numbers and layout

The site allocation in the Local Plan envisages approximately 25 dwellings and as outlined in criterion 1 of the Policy H1(52) with the built development restricted to the currently developed area (approx. 1.8ha) north of the Ha-Ha and Folly with development to be excluded from the area of the existing pond.

Criterion 2 of the allocation policy requires the retention and restoration of the Ha-Ha, The Folly, the water tower and barn, the walls surrounding the former walled garden and other ragstone walls within the site. Criterion 3 requires the restoration of the parkland/garden associated with the former house containing The Folly, and Ha-Ha as publically available open space.

Criterion 4 of the policy requires that any application should be accompanied by a detailed viability assessment and appraisal showing that the development proposed is the minimum necessary to secure criteria 2 and 3 as outlined above. No viability work has yet been provided and until this work has been completed I am unable to comment on any justification for the specific quantum of development on the site. Notwithstanding this, I will provide some general comments on the proposed layouts of the 2 options presented.

As a general comment, the development within the walled garden shown on page 10 of the submitted brochure does not appear to reflect either the layout shown in option 1 or option 2. In any a case, the subdivision of the walled garden into separate parcels is unlikely to be supported as it would not restore the walled garden as required by the allocation policy.

Option 1 is for 46 dwellings and does include some development outside of the existing built up area and around the lake. This extends beyond the scope of the Local Plan site allocation and it would not be acceptable as it would create built up development outside of the existing built up area and within the countryside contrary to criterion 1 of the allocation policy. Within the previously developed area of the site, the approach advocated in this option would also create a higher density suburban development which would be at odds with the rural location of the site. This layout would also create a significant amount of development surrounding the former walled garden which is considered an important feature to be restored as part of any future development. This quantum of development would also be out of character for the site within this rural location. I do not consider that this proposed layout would respect the character of the site, its heritage significance and is not likely to be acceptable to the Local Authority.

In regard to option 2, whilst I appreciate the layout at this stage is indicative only, the general layout with development to the north of the developable area of site is generally more acceptable. My main concern relates to the southern and lower eastern section of the proposed built up development due to the higher density in this area. This layout would also appear to create a situation where homes back onto the street and provide blank elevations which should be avoided. I note that this option removes development from around the pond which is a positive of this proposed layout. Further discussions on the layout and detail and appearance of the dwellings can be taken up in future pre-application meetings, but a high standard of design sustainability incorporating the use of vernacular materials and buildings styles will be critical in achieving an acceptable form of development. I would also comment that dwelling no's 22-27 that are shown on page 12 appear to be quite tall with high steeply pitched roofs which could appear overbearing when viewed from the walled garden.

I note that the southern half of the site is to be restored as publicly accessible open space. This is in line with Policy H1(52) and OS14 which requires the provision of natural/semi-natural open space at the site.

### Conservation

The Conservation Officer's full advice has already been provided to you separately and for completeness I have also attached them to the appendix of this letter for completeness. To summarise the Conservation Officer has no objection to the demolition of the 20<sup>th</sup> century buildings. The further detailed study is requested by the Conservation Officer and full details of what should be included in this further assessment is set out in the Conservation Officer's full comments.

In regard to your further specific question of dwellings around the walled garden, the Conservation Officer has no objection to option 2 subject to one side of the walled garden being retained without development in order to retain the original character and historical reference to this area of the site. I also consider the restoration of the walled garden would be an attractive feature of the scheme. However, with development positioned around the wall, further consideration would be needed on how dwellings 16-21 would operate with regards to amenity, whether they will be single aspect, refuse and parking. The rear of dwelling No.19 and No's 20-21 also appears to show development inside the walled garden which is unlikely to be acceptable.

### Access/ Highways and Transport

I note that during the examination of the Local Plan the site was included on a list of sites in the South of Maidstone to which the Highway Authority objected in its letter of 16<sup>th</sup> December 2016. However, the Local Plan Inspector found that the site would generate fewer traffic movements than that of the now deleted H1(53) allocation (Boughton Lane) to which the Highway Authority did not then object. The Inspector also outlined that the previous use of the site would have generated some movements and the allocation of the site was therefore retained in the adopted Local Plan. Going forward, in terms of highway impacts, I would therefore advise carrying out pre-application discussions with Kent Highways.

Parking provision would be required to be in line with Policy DM23 and as a general rule this should not be tandem parking and does not include any garage spaces.

### Affordable Housing and CIL

Affordable housing would be required at 40% with a 70/30 split in favour of affordable rent which is the requirement under Policy SP20 and this would need to be secured under a s106 agreement.

The Council has also adopted CIL and this would be required for any development with rates and information available on the Council's website.

### Trees and Landscaping

A forthcoming application should be designed to take into account the results of an LVIA. As part of the landscape proposals I would expect to see a proposal retain and reinforce the existing woodland and planting along the site's northern boundary.

### PPA

I would strongly recommend a Planning Performance Agreement (PPA) for this development so we can set out a clear pre-application programme to identify/resolve any key issues, engage with our Members for their feedback and agree the project timetable for determination of any forthcoming planning application. A PPA could also involve discussions on detailed highways matters with Kent Highways involvement. I enclose the Council's draft PPA and the link to our website is below. Please contact me if you would like to discuss further.

<http://www.maidstone.gov.uk/home/primary-services/planning-and-building/additional-areas/planning-performance-agreements>

### **Documents required to be submitted:**

When applying for planning permission there are National and Local requirements to make the application valid. The validation checklist of what is needed can be found online at: [www.maidstone.gov.uk/validationchecklist](http://www.maidstone.gov.uk/validationchecklist). The following additional information is also required:

- Contaminated Land Investigation
- Detailed Heritage and Archaeological Impact Assessment
- Draft Planning Obligation/Section 106 Agreement
- Transport Assessment
- Tree Survey, including arboricultural survey, tree constraints plan and tree retention/protection plans.
- Viability Assessment
- Phase 1 habitat survey and any further specific surveys
- Flood risk assessment and surface water drainage strategy
- Landscape and visual impact assessment
- Refuse strategy

If you wish to submit an application you can do so online at: [www.planningportal.co.uk/applications](http://www.planningportal.co.uk/applications)

As a developer; you are advised to carry out additional pre-application consultation with other interested parties such as neighbouring residents and ward councillors. Contact details for ward councillors can be found on the Council's website at the following link <http://bit.ly/2EpAXTk>

The advice given above does not indicate any formal decision by the Council as Local Planning Authority. Any views or opinions are given in good faith and to the best of ability, without prejudice to the formal consideration of any planning application. The final decision on any application that you may make can only be taken after the Council has consulted

local people, statutory consultees and any other interested parties. The final decision on an application will then be made by senior officers or by the Council's Planning Committee and will be based on all of the information available at that time.

The advice will be carefully considered in reaching a decision or recommendation on any resulting application; subject to the proviso that circumstances and information may change or come to light that could alter that position. It should be noted that the weight given to pre-application advice notes will decline over time.

The Council formally approved our Community Infrastructure Levy (CIL) Charging Schedule at Full Council on 25 October 2017. It will be implemented on Monday 1 October 2018 with further details available on the Council's website at the following link: <http://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-primary-areas/community-infrastructure-levy>

Works may also require separate approval under the Building Acts and you are advised to contact the Council's Building Control Section at [building@maidstone.gov.uk](mailto:building@maidstone.gov.uk) or [01622 602701](tel:01622602701) with the following a link to the relevant webpage. <https://tinyurl.com/ybx7u5mo>

Yours sincerely

**For Head of Planning & Development**

Adam Reynolds (MRTPI)  
01622 602638

**Appendix 1 – Conservation Officer Comments:**

The site visit last week was very useful and allowed us not only to understand the layout of the area concerned and the built structures within it, but also to absorb the atmosphere and feel of the site and those particular areas and structures of particular heritage interest. It is a place steeped in a feeling of mystery and desertion which lends it a somewhat romantic atmosphere. The wooded areas, the overgrown areas, and the crumbling buildings and ivy covered Gothick structures are important elements in this site and it is the description of these as much as their physical appearance which are useful in informing the tone of any proposed scheme.

Such matters are not usually written about in a planning context and more usually confined to the descriptive opening pages of Victorian ghost stories which are still widely read. The

ghost story genre of that era describes the large country house or pile with its large and beautiful gardens to great effect, where strange events and horrors gradually unfold, perhaps irrelevant in a practical and unromantic planning environment but these stories are, nevertheless, a good way to understand the motivation behind the architectural and horticultural recreation of a past that no longer existed even then. The principal building, Boughton Mount, now long gone, would once have been an attractive country house in immensely beautiful grounds, hopefully without the more unpleasant ingredients of the gothic novel or story, but certainly within gardens and woods that were laid out and dressed and decorated using a physical expression in marble, old stones and foliage that was nothing more than fantasy and vanity. The structures that remain in this site were clearly not intended to be useful in the usual understanding of the word but they lent atmosphere and interest to what would have been considered rather prosaic surrounding. This romanticism, manifest in the 18<sup>th</sup> Century concept of the 'picturesque', was responsible for the building of ruins, follies and temples, and for the abundant re-construction of Gothic-inspired architecture in towns, cities, villages and country estates. This physical expression of Medievalism and mystery was a reaction to modernity and was fuelled by a desire to recapture both the mood and the built expression of those ancient, bygone days of Medieval England. The Intangible, those thoughts and ideas that inspire and lead to the Tangible has as much importance as any built physical heritage, and the need to preserve Intangible Cultural Heritage - a concept much used by the likes of UNESCO and other trans-national heritage and Indigenous People's organisations and written into heritage based charters - is as important as the preservation of built cultural heritage.

Using one's imagination is important when considering this proposal at inception and feasibility stage. It includes thinking about what once the house and grounds would have been like (after they had had a little time to weather and to age) and how they were changed from the Idea to Reality. It is one's imagination and the preservation of Victorian ideals that are key ingredients in the task of designing new buildings, conserving and repairing the folly, the ha ha and bridge and the pond and recreating the gardens.

It is my view that when considering the development of the site that intangible cultural heritage considerations should be given almost as much weight as the more practical considerations listed under Local Plan Policy H1 52. These criteria cover design and layout, access, heritage impact and landscape/ecology and the provision of open space among the directly relevant factors.

Whilst the folly and the Ha Ha are designated heritage Assets and of high significance and structures of beauty, it is not my view alone that the water tower/barn, the kitchen garden walls, the unusual looking curvilinear red brick wall and the various ragstone walls are all equally important within site. They add to the historic, aesthetic and evidential value of the site well as adding much character to what are now essentially overgrown gardens and unmanaged woodland, once the well-tended grounds of Boughton Mount and later on under

the management of the Council when the now dilapidated but newish buildings were provided to the community for the provision of education.

The pitfalls of restoration:

Under *Design and Layout* points 2 and 3 (which are also referenced in 9 under *Heritage Impact*) of H1 52 there is a specific requirement for the 'retention and restoration' of all of the above structures with the exception of the pond, or rather the built structure surrounding it and the kitchen garden and the surround extant wall. I have no issue with the term 'retention' and would completely support this aim. However, the use of the term 'restoration' may not be quite appropriate in the case particularly of the Folly and the Ha Ha and connected bridge but also in the case of all those structures which are of architectural, historic and aesthetic interest. In the tradition of the 'anti-scrape' movement which resulted in the formation of the SPAB (Society for the Protection of Ancient Buildings) the use of restoration needs to be curbed so that the ideals and dreams of the architect and of the owner of Boughton Mount can be carried on. Restoration means essentially the re-creation of what is thought to have *been* as opposed to what actually *was*. Restoration of old churches by Gilbert Scott and his ilk involved a complete rebuild of parts of ancient churches with new architectural elements added in a pastiche medieval style and this was rightly decried by the likes of William Morris and Ruskin of the SPAB.

Therefore, the repair and conservation of historic structures and edifices is best approached by keeping in mind the well known but still highly relevant (Philosophy of Conservation) philosophical tenet of 'minimum intervention and conservative repair'. These four words alone, when applied at the appropriate time and in the right context, can prevent the wholesale and ignorant destruction of heritage assets, a destruction that may not be perceived by the public as being destruction at the time it is carried out but when looked through the lens of history can be understood as such.

I would add also that in terms of the Ha Ha (and the 'ditch') which was built as part of a landscape feature, rather than a feature in itself, it would be very important to ensure that any scheme allows for at least a good part of this feature to be seen and viewed. The Ha Ha functioned as a retaining wall which allowed the 18<sup>th</sup> C and 19<sup>th</sup> C viewer to see an uninterrupted view of the vista beyond it rather than the boundary itself, rather like the infinity pools so popular in the 21<sup>st</sup> C. The ditch behind it is also part and parcel of its intrinsic character and layout and would also need to be retained under any wider scheme. The bridge from the Ha Ha acts both as a decorative architectural feature and a symbol of the impracticality of the Ha Ha by spanning over the void that the Ha Ha necessarily created.



Ways forward:

I will not at this stage be commenting on the details of the best method of conservation of the Folly, Ha Ha, bridge and the other structures and edifices already mentioned but I would expect to see for each structure a detailed historic, structural and condition analysis and survey, a visual and character analysis namely for the Folly, the Ha Ha and Bridge, the barn and water tower\* and the pond. This would also apply to the various walls within the site demise so that we know exactly where they are and how much is left of them so they would need to be surveyed and scheduled in more detail and then the extent of their retention agreed. I would also like to understand more about the walled kitchen garden so more information about that would be required.

(\*I understand a visual assessment /survey of the water tower and barn has already been submitted)

In terms of the documentation I have seen, the Heritage Assessment is a very useful introduction to the site and has been very effective for this stage of the process but a more detailed study would need to be submitted as part of any forthcoming application. I will not at this stage go into particulars. However the covering letter from DHA is unambiguous in the way it sets forward the idea that only the designated heritage assets are worth retaining and even those are no longer contextually relevant. Therefore any Heritage Assessment would need to make sure that all the structures that I have noted as key features and some that have yet to be fully identified, that form the character and the built environment of the site are assumed to be of significance, some less so indeed, but all of them need to be first given due consideration before ruling them out as being of no inherent or intrinsic value.

In terms of the scheme in principle, I do not have any objection to the demolition of the late 20<sup>th</sup> C buildings but I would like to see these recorded/scheduled and recorded for posterity. Any virtuous elements of architecture should be also recorded.

In terms of the design 'mores' for the scheme I will not comment at this stage but I am happy to assist with advice in the design stage if this would be helpful.