

Site 3: Len House

Appendix 3A: Planning Context

National Policy Considerations

The National Planning Policy Framework (NPPF) was most recently updated in February 2019. This, together with relevant Planning Practice Guidance (PPG) now represents the most up-to-date national planning policy and guidance.

The NPPF Revision and the PPG place importance on the need to deliver sustainable development. This includes the delivery of necessary development to ensure that local planning authorities can sustainably meet the development needs of their area.

Key objectives within the NPPF Revision include:

- Significantly boosting the supply of homes including affordable homes and maintaining a five year supply of deliverable housing sites.
- Building a strong, competitive economy, placing significant weight on the need to support economic growth and productivity, and taking into account both local business needs and wider opportunities for development.
- Ensuring the vitality of town centres, and supporting the role that town centres play at the heart of local community by taking a positive approach to their growth, management and adaptation.



Palace Road frontage showing regeneration of island within River Len

Local Policy Considerations

Maidstone Borough Local Plan (2017)

Maidstone Borough Council adopted the Maidstone Borough Local Plan 2011 – 2031 ('MBLP') in October 2017. The MBLP comprises both the strategic aims and policies for the borough, and specific site allocations. Relevant policies are set out below and include:

- Policy SP4 – Maidstone Town Centre (including town centre boundary; The Mall redevelopment opportunity)
- Policy SP18- Historic environment
- Policy SP20 – Affordable housing
- Policy H2(1) – Detailed policies for broad locations for housing growth: Maidstone Town Centre
- Policy DM1 – Principles of good design
- Policy DM4- Development affecting designated and non-designated heritage assets
- Policy DM16 – Town centre uses
- Policy DM19 – Publicly accessible open space and recreation
- Policy DM23/Appendix B – Parking standards
- Policy DM28 – Secondary shopping frontages
- Policy DM29 – Leisure & community uses in the town centre

The MBLP seeks to strike an appropriate balance between the national call for homes and the local need for housing (including affordable housing) and

employment for a growing population. Development in the borough has been planned with supporting infrastructure to make proposals acceptable and to maintain residents' quality of life.

The MBLP advised that attention should also be paid to providing sufficient green spaces, not only for people to enjoy but also to the value we should place upon our natural environment for its own intrinsic worth.

The borough assets, together with its good access to London and the channel ports for Europe, make Maidstone an attractive location for people in which to come to work and live. This creates a high pressure for development, so the MBLP focuses strongly on sustainability. Maintaining sustainable communities for the borough's urban and rural residents and businesses is at the heart of the MBLP's objectives.

Policy SS1 of the MBLP includes a housing target of 17,660 dwellings over the 20 year Plan period. This equates to a target of 883 dwellings per annum. In addition, the spatial strategy for the borough identifies a need for:

- 39,830m² floorspace for office use
- 20,290m² floorspace for industrial use
- 49,911m² floorspace for warehousing use
- 29,800m² floorspace for retail use

The sites are all within the Maidstone Town Centre. Policy SP4 sets out a vision for the town centre, as shown in the adjacent box. It seeks to retain and enhance a variety of well integrated attractions including shopping, service sector-based businesses, leisure and cultural facilities that the town centre offers and also to retain the best quality office stock, whilst allowing for the redevelopment of lower quality offices. The MBLP seeks to focus retail uses within the primary and secondary shopping frontages policy areas of the town. To the north and west of the site, Mill Street is covered by the secondary shopping frontages policy, however the site itself is excluded from this.

The site offers an excellent opportunity for high density urban living in close proximity to the retail, business and leisure opportunities provided by the town centre. The MBLP, paragraph 4.65, states: “Whilst commercial uses are the priority for the town centre, residential development can have a supporting role, in particular as part of mixed use schemes. Additional residential development in the town centre will help to promote town centre vitality, especially during the evening.” Policy SP 4(vii.) promotes: “Select opportunities for residential redevelopment”.

The MBLP seeks to focus retail uses within the primary and secondary shopping frontages policy areas of the town. These are primarily to the north of the high street, within Fremlin Walk and Week Street and within The Mall to the east. The closest shopping frontages to the site are the ‘Secondary Shopping Frontages’ along Bank Street and High Street to the north and Gabriel’s

Hill to the east. In these areas, the MBLP promotes the continued vibrancy of these streets, with their predominance of small units and independent shops.

Maidstone has approved vehicle parking standards published by Kent Highway Services as an interim measure for development management decisions, and the County gives advice on development proposals that generate a need for parking provision. Parking standards are set out in Policy DM23/Appendix B of the MBLP.

Open space provision on new housing sites is covered by MBLP Policy DM19, requiring a standard of 0.7 ha amenity green space, 0.25ha space for children and young people and 1.6ha publicly accessible outdoor sports space per 1000 residents. The policy also requires 0.2ha allotments and community gardens and 6.5 ha of natural/semi-natural areas of open space per 1000 residents. Given the compact nature of the site and the high density context, it is recognised that it will not be feasible to provide the required amount of open space on the site. Paragraph 6.89 of the MBLP allows for a financial contribution to be made to improve existing sites and enhance the capacity of existing provision if suitable opportunities for new open space cannot be identified within the specified accessibility standards due to site constraints.

There is a significant need for affordable housing within the borough and a clear justification for the Council to seek affordable dwellings through new development schemes. In order to respond to the identified need for affordable housing of different tenures through the

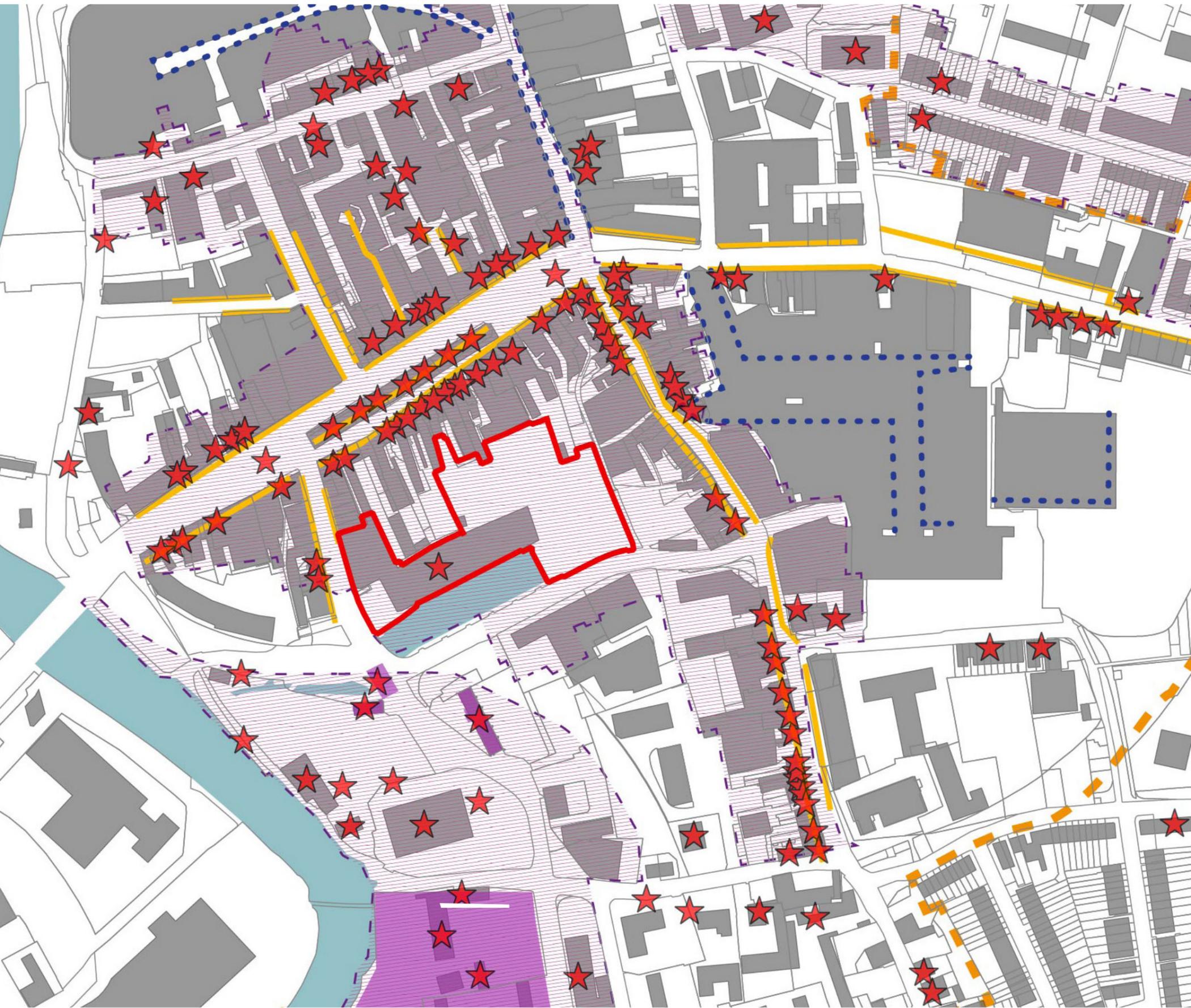


Figure 3.1: Designations and Features

scale 1:2500 @ A3

- | | |
|---|---|
|  Conservation Area |  Maidstone Borough Local Plan Policy DM27 Primary shopping frontage |
|  Scheduled Monuments |  Maidstone Borough Local Plan Policy DM28 Secondary shopping frontage |
|  Listed Buildings |  Maidstone Borough Local Plan Town Centre Boundary |
|  Built Form |  Site Boundary |
|  Water Bodies | |

period of the plan, the MBLP has a target rate of 30% affordable housing for new developments within the Maidstone Urban Area (Policy DM20), with indicative targets of 70% affordable rented housing, social rented housing or a mixture of the two and 30% intermediate affordable housing (shared ownership and/or intermediate rent). The inclusion of this quantum of affordable housing on the site may not be achievable due to economic viability however and, in such cases, the policy recommends developers to enter into negotiations with the Council's Housing department, in consultation with registered providers at the earliest

stage of the application process. Given the costs of refurbishing/converting the listed building on the site, viability of any development is likely to be an issue, and early discussions relating to affordable housing provision are therefore highly recommended.

The site contains an historical car showroom building which is Grade II Listed (listing ID: 1393579). Therefore this provides an immediate restriction to development opportunity. The building also lies within the Maidstone Town Centre Conservation Area and within the setting of several listed buildings: Nos.16-20 and No.22 Mill Street (both Grade II-listed) to the west; Grade II Nos.

Policy SP4: Town centre vision

By 2031 a regenerated and sustainable Maidstone town centre will be a first class traditional town centre at the heart of the 21st Century County Town that has maintained its place as one of the premier town centres in Kent by creating a distinctive, safe and high quality place that has:

- Retained its best environmental features, including the riverside and the enhanced public realm;
- Provided a variety of well-integrated attractions for all ages including new shopping, service sector based businesses, leisure, tourism, and cultural facilities;
- Improved access for all.

Key components in realising this vision are:

- Enhancing the diversity of the retail offer, supporting a continued balance between independent and multiple retailers;
- Creating a highly sustainable location resilient to future climate change;
- Establishing the town centre as an attractive hub for business building on the town centre's assets and environment;
- Creating a stronger mix and balance of uses within the centre to support long term viability including where appropriate residential development; and
- Tackling congestion and air quality issues through improvements in provision for vehicles, pedestrians and cyclists, including public transport.

69, 70, 74-75, 76-77, 79-81, 82, 83-84, 86, 87-88, 89 Bank Street (all Grade II) and Nos. 78 and 85 Bank Street (both Grade II*) to the north; and Nos.16-18 and No.20 Gabriel's Hill (both Grade II), No.2 Lower Stone Street (Grade II) and Nos.2-6 Palace Avenue (Grade II) to the east. To the south-west of the site are the Tithe Barn (Grade I), the Len Bridge (Grade II), the Gate House (Grade II), the Archbishop's Palace (Grade I) and All Saints Church (Grade I); which all make up part of the All Saints Conservation Area, which also forms part of the building's setting. Len House also forms part of the Conservation Area's setting. Further information on policy relating to heritage assets within the NPPF and Local Plan are given in a Heritage Review at Appendix 3C.

The site is within flood Zone 3 which has the highest risk of fluvial flooding. The NPPF Revision is clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (paragraph 155). Different types of development have different vulnerabilities, and therefore are regarded as being appropriate or inappropriate. Developments and land uses that are regarded as being "more vulnerable" are not appropriate in flood zone 3. The PPG is clear that such development should be directed towards areas of lower flood risk.

Depending on the type of development being proposed, it may be necessary for the sequential and exceptions

tests to be passed. A flood risk assessment will certainly be required if a development is progressed (see the PPG and NPPF Revision footnote 50). This will need to be considered early on as it will have the potential to affect the scheme, type of development and also quantum.

Neighbourhood Plans

There are no made Neighbourhood Plans impacting upon the site.

Relevant Planning History

The site has been subject to various planning applications for minor alterations and additions over the years. These included a change of use application to use the part of the building as a snooker/billiards licensed club (1983) and planning and conservation area consent applications to demolish a used car showroom and formation of replacement used car sales offices within the existing building (1993). Various applications for changes to signage have generally been approved however an application of two signs on the tower in 1974 was refused.

Site 3: Len House

Appendix 3B: Site Analysis

3B:01 Land Use

The site is owned and managed by Peugeot and is currently in use as a dealership for new and used cars, together with vehicular maintenance workshops and parking. The building is in need of some maintenance work.

The Mill Street part of the building comprises a new car showroom at ground floor, with a disused snooker club above. To the rear, there is a glass-roofed parking/workshop area that was historically part of the showrooms. This is accessed from Mill Street.

The eastern part of the building, fronting the River Len, is over two floors, but a mezzanine level at the west end (Mill Street) results in two rows of upper windows on the west elevation. This western end of the building includes office space, however most of the building comprises open plan workshops. An internal vehicular ramp accessed from the Mill Street frontage provides access to the first floor.

To the east of the building, on the Palace Avenue frontage, the dealership operates their used cars sales area, with vehicular access provided from Palace Avenue. To the north of the used car area, there is a large secure parking area for storing cars. This area shares boundaries with a number of properties on Bank Street.

To the west of the site, Mill Street is part of Maidstone's historic core. It includes ground floor retail units and cafes with mixed uses above. West of this is the Bishops Way dual carriageway. This forms part of the main vehicular route around the town centre, creating a relatively hostile pedestrian/cycle environment and acting as a physical barrier between the town centre

and River Medway beyond.

To the north of the site, Bank Street and High Street form the southern part of the more vibrant town centre shopping area, which includes Royal Star Arcade and Fremlin Walk shopping centre. Like Mill Street, these are dominated by historic buildings with shops, cafes/restaurants and drinking establishments on the ground floor and mixed uses above.

Immediately to the north of the site, the boundaries of properties on Bank Street generally include rear yards and storage areas, with little opportunity for overlooking. However, two - three properties at the western end of this boundary do have windows on their southern elevation and appear to be in residential use. A night-club on Bank Street which also backs on to the site presents a predominantly blank brick façade to this northern site boundary. In the northern corner of this rear yard, there is a small beer garden attached to the Brenchley pub (also on Bank Street) which overlooks the site.

Between the rear of Len House's Mill Street frontage and the car storage area south of Bank Street, there is an area that lies outside of Peugeot's ownership but abuts the northern façade of the site's eastern block. These parcels are surrounded by coniferous trees to the south and west, which provide visual separation from the parking area of the site. The western part of this land parcel includes a narrow strip of garden/disused space which immediately abuts the eastern wall of the Len House rear workshop area. Due to lack of visibility it is not possible to ascertain the uses within this area, but according to aerial photography they appear to be yards

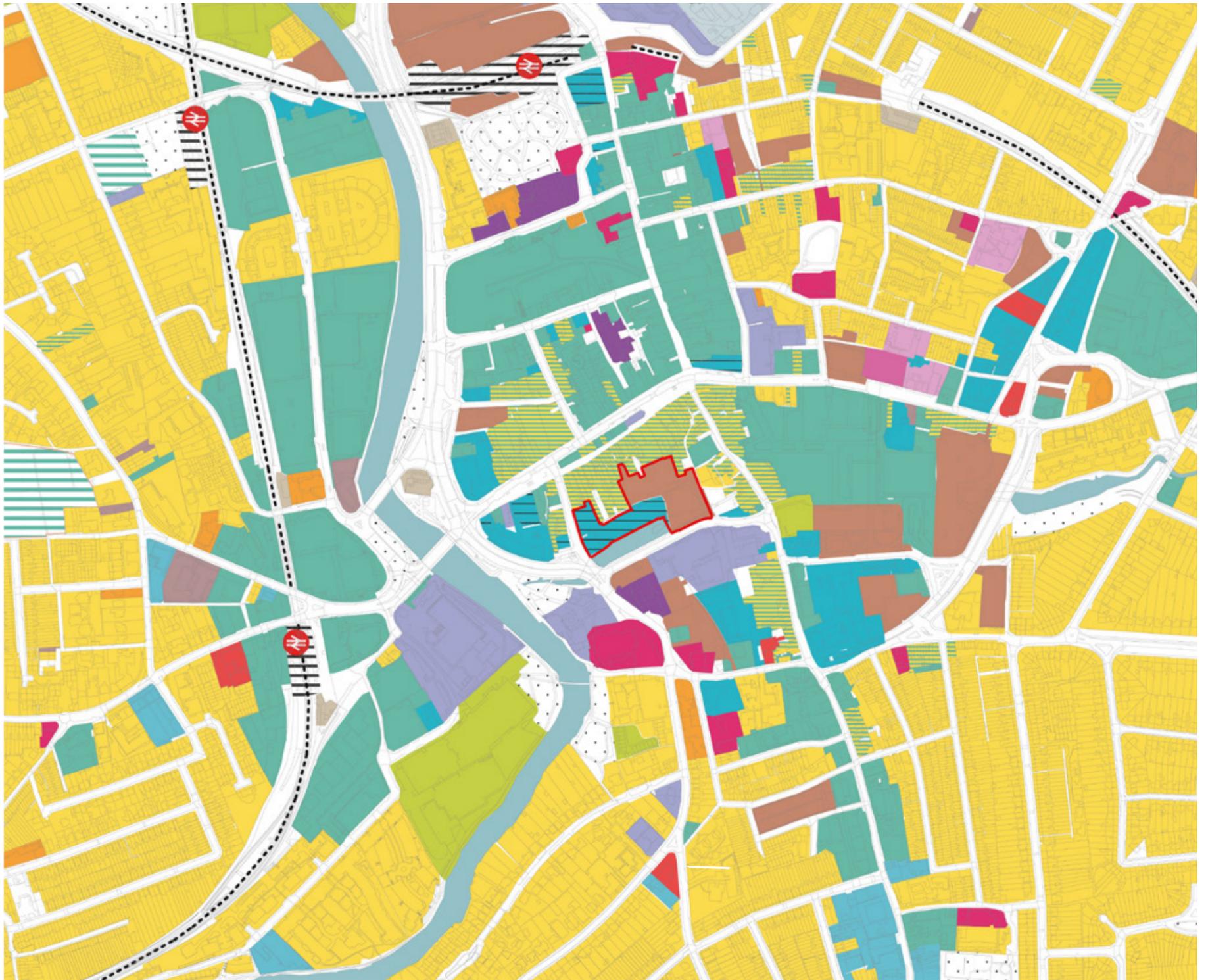


Figure 3.2 Land Use

- | | | |
|---|---------------------|-------------------------------|
| Residential | Civic | Allotments |
| Retail | Cultural | Place of Worship |
| Mixed-use (Ground Floor Retail and Residential) | Leisure | Car Parking |
| Employment | Hotel | Industry and Electricity |
| Mixed-use (Retail and/or Employment) | Prison | Hospital and Doctor's Surgery |
| Education | Park and Open Space | Train Station |
| | Community Centre | Site |

associated with the retail/business uses on Bank Street.

To the east of the site, the buildings on Gabriel's Hill are in ground floor use as shops with mixed uses above. Gabriel's Hill also includes a night club as well as an entrance to The Mall, a large covered shopping centre and associated multi-storey car park.

To the immediate south, the River Len runs immediately adjacent to the southern wall of the eastern block of the building. This flows to join the River Medway to the west. Within the eastern part of the site (the used car sales area), the river is culverted, although it remains uncovered to the east of the access road to the east of the site. It is then culverted again beneath buildings in Gabriel's Hill and to the east.

South of the river, Palace Avenue runs parallel to the site's southern boundary. Immediately opposite the site, on the southern side of Palace Avenue, there is a public pay and display car park, Maidstone Police station and Magistrates Court. South of these are relatively extensive areas of private and public surface level parking.

To the south-west of the site, beyond the Palace Avenue/Bishops Way/Mill Street junction there is the historic Archbishops Palace area, including the All Saints Church of England church, fronting the River Medway.



Mill Street frontage. from Palace Avenue.



Palace Avenue, looking east.



Pedestrian link to Bank St



Pedestrian link at Bank St



Northern elevation, from northern site boundary.



Mill Street, looking north



Mill Street frontage of showroom



Yard to north of building, from roof.

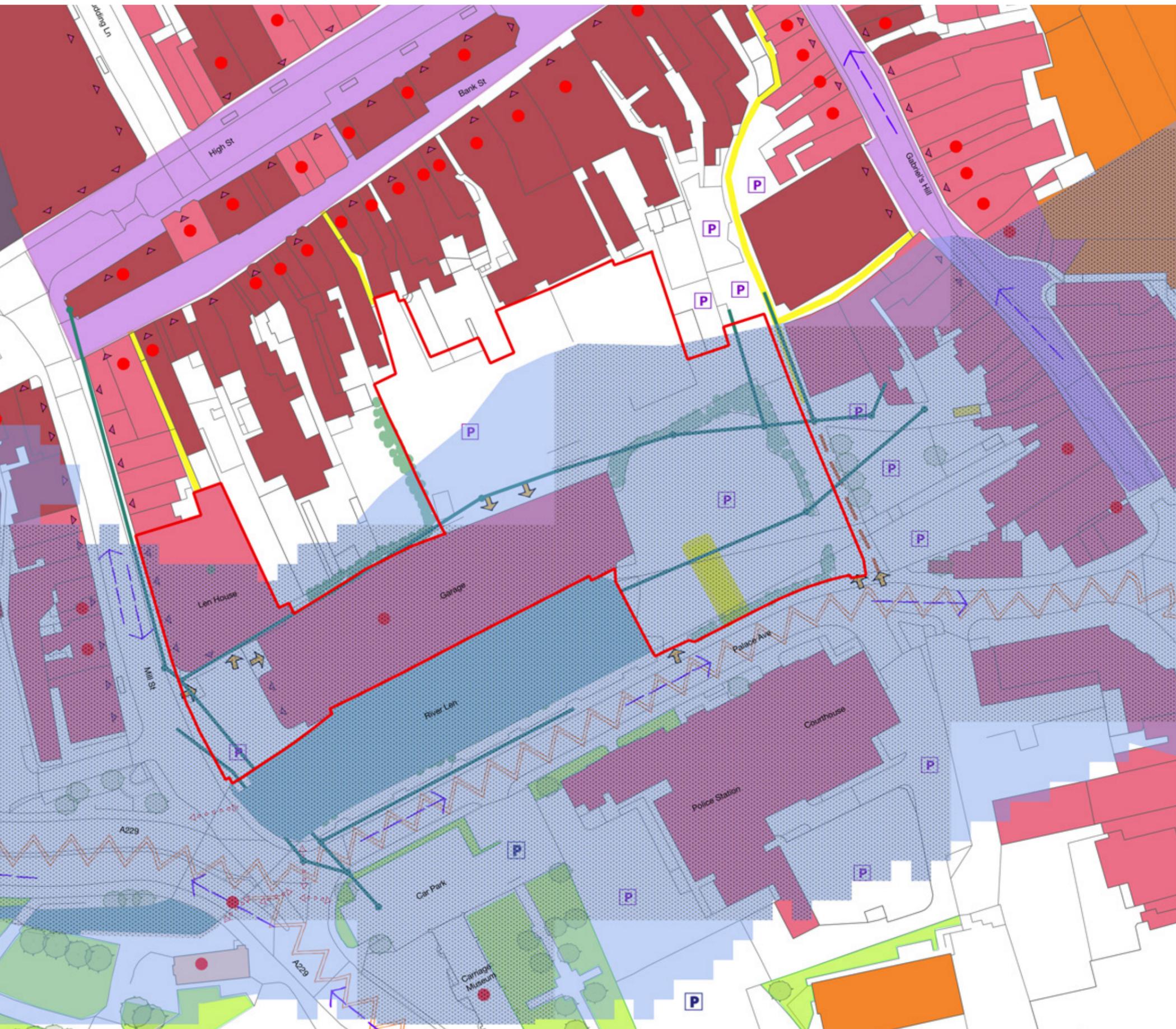
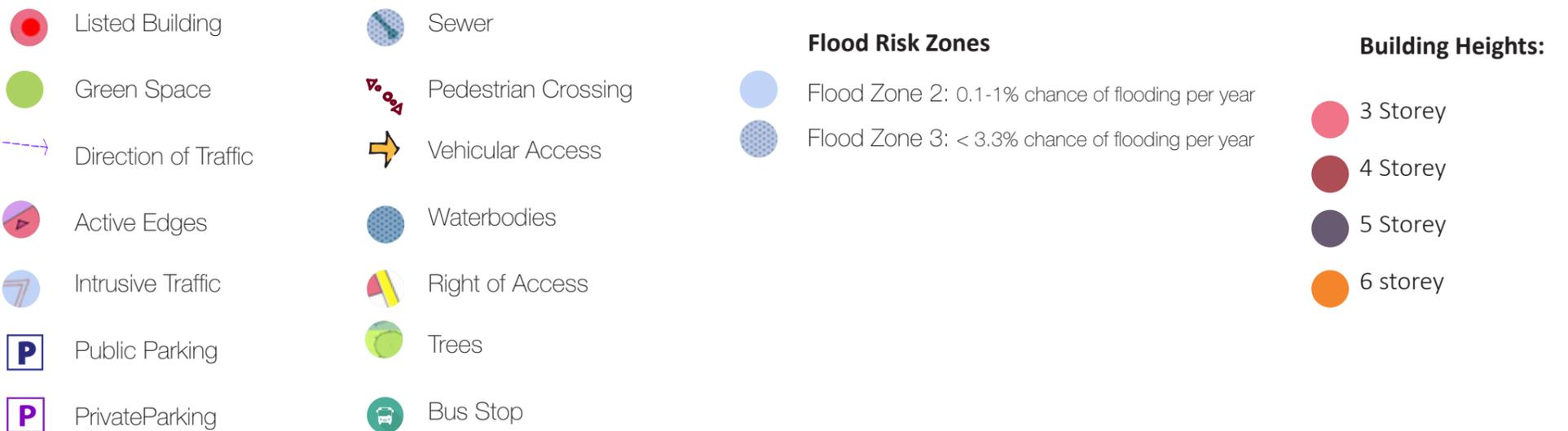


Figure 3.3 Contextual Analysis including Building Heights



3B:02 Built Form

The buildings on the site are two storeys in height. The ground floors are relatively high ceilinged, however the flat roof means that the overall height of the buildings are still lower than the equivalent of the adjacent three storey properties on Mill Street.

Given the historic function of the building to accommodate vehicular circulation, both blocks are very deep, with the Mill Street showroom/rear workshop approximately 28m deep and wing along Bishops Avenue approximately 27m deep.

Within the wider area, buildings are generally three to four storeys in height, consisting of dense historic terraces. Roofs are generally pitched, although there are some flat roofed properties. The parking area within the site and on the Palace Avenue frontage provides a relatively large open area, in what is otherwise a densely built up area. In particular, this means that the Palace Avenue frontage lacks visual enclosure.



Mill Street, looking north



Mill Street eastern frontage



Maidstone Police Station & Magistrates Court & Family Court, Palace Avenue



High Street, looking east.



Jubilee Square, High Street.



Mill Street/ Bishops Way junction.



Museum of Carriages, The Tithe Barn. Listed building on Palace Avenue/ Mill Street.



Bank Street. Properties on right back on to site.

3B:03 Heritage and Architecture

The site lies within the heart of the historic core of Maidstone. Historic mapping (Figure 3.4) shows that in Victorian times the site was occupied by a tannery and corn mill, as well as numerous small buildings associated with properties on Bank Street. The current location of the River Len to the immediate south of Len House was historically constructed as a mill pond with a further river channel appearing to run adjacent to the northern part of the existing Len House building and through the western part of Len House/within its front courtyard. South of the Mill Pond was a corn mill and a plant growing nursery. It is not until the 1936 map that Palace Avenue is present, with associated Police Station and Court House to the south.

Len House, also known as the Rootes building, is Grade II listed and also sits within the Maidstone Centre Conservation Area. It opened in 1938, when the showroom was considered the largest and most up to date in Kent.

The building was first listed in October 2009 for the following principal reasons:

- The building is of architectural interest as an example of a Modernist motorcar showroom and workshops which retains a significant proportion of its original fabric.
- The building is of architectural interest due to its grand scale, town-centre location and picturesque setting adjacent to the Len mill pond, which distinguishes it from other

buildings associated with the motorcar industry during this phase of early motoring.

- The building is a prominent manifestation of a hugely successful British car manufacturer, built in a period when the expansion of car ownership was having a revolutionary impact on the physical and social fabric of the nation

Internally, the workshops are largely open plan with the vehicular ramp between ground and first floor being a principal feature. The concrete and steel structure of the building is undisguised; at ground floor, concrete cross beams rest on large columns, supporting the first floor above. At first floor, the workshops are open to the roof. A number of original staircases remain throughout the building, mainly characterised by curved steel-strip balusters with wood or metal hand rails, as well as a curved mezzanine viewing gallery (now enclosed) in the south-east corner of the showroom. Historically, the open parking area on its Mill Street frontage was used as a petrol filling station.

Within the Maidstone Centre Conservation Area Appraisal (2009), the Rootes building is described as being redeveloped in the 1930s as: "*large and impressive state-of-the-art showrooms and workshops which remain such an important feature of the Conservation Area today*" (p.22) and is further noted as constituting "*an iconic building now of great townscape importance*"(p.82). It is therefore a sensitive site and any development here needs to respect the dominance of the listed building and the integrity of its setting

externally, as well as best preserving those internal features which are highlighted in the listing description as being significant, such as the internal ramp.

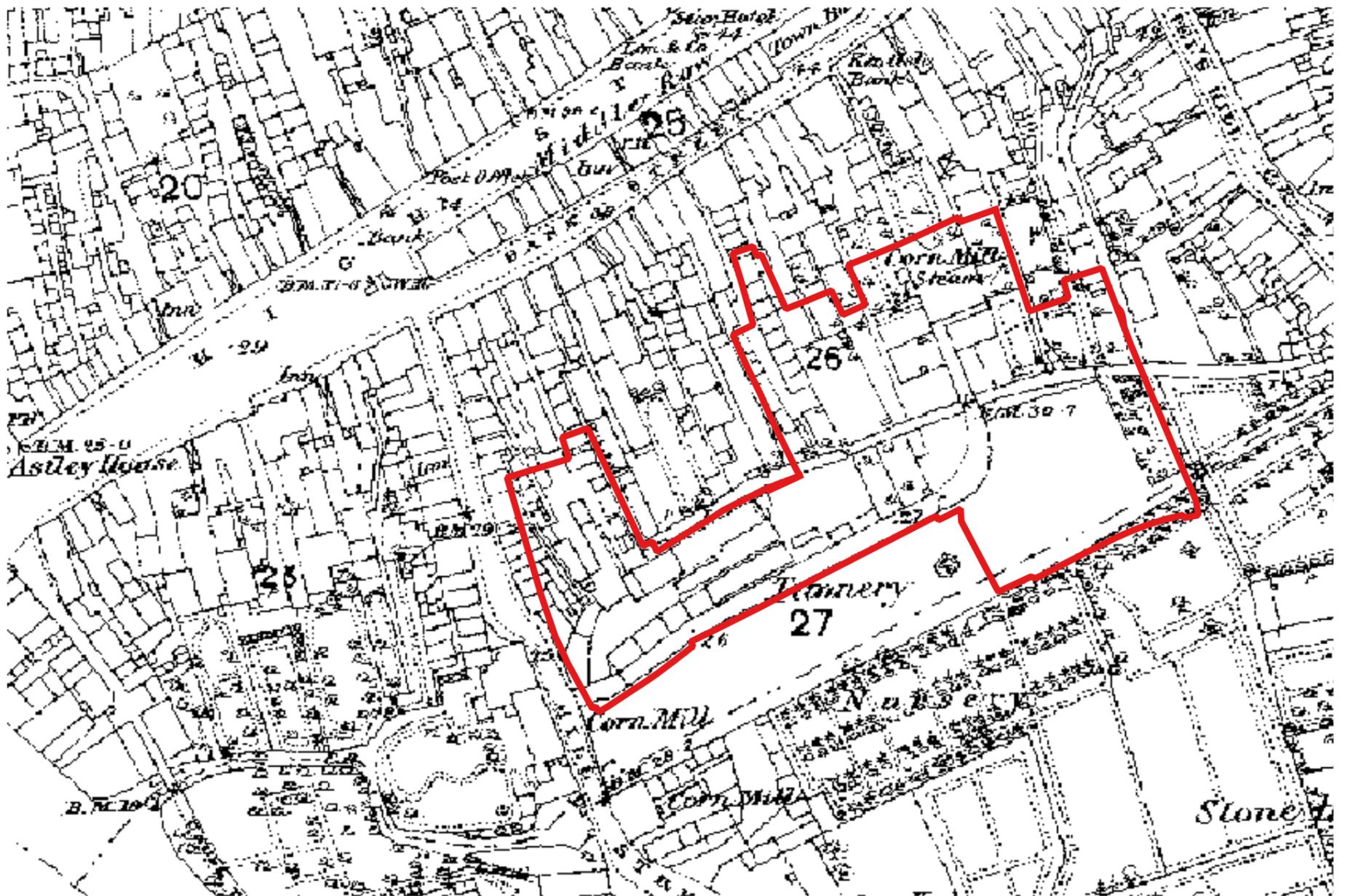
Few buildings within the Conservation Area as a whole exceed three storeys in height and the Rootes building is named as one of the landmark buildings within the town and Conservation Area, described as 'sitting attractively alongside the Mill Pond at the southern entrance to the Conservation Area...' (CAA, 2009, p.29). Most development within the Conservation Area is still of

2-4 storey height with only a few modern exceptions to this, which are generally appraised as making a negative contribution to the Conservation Area, and further the CAA states that '*it is unlikely that in any location development above four storeys will be considered acceptable*' (ibid. p.103).

A more detailed heritage analysis has been undertaken by Savills Heritage and is included at Appendix 3C.



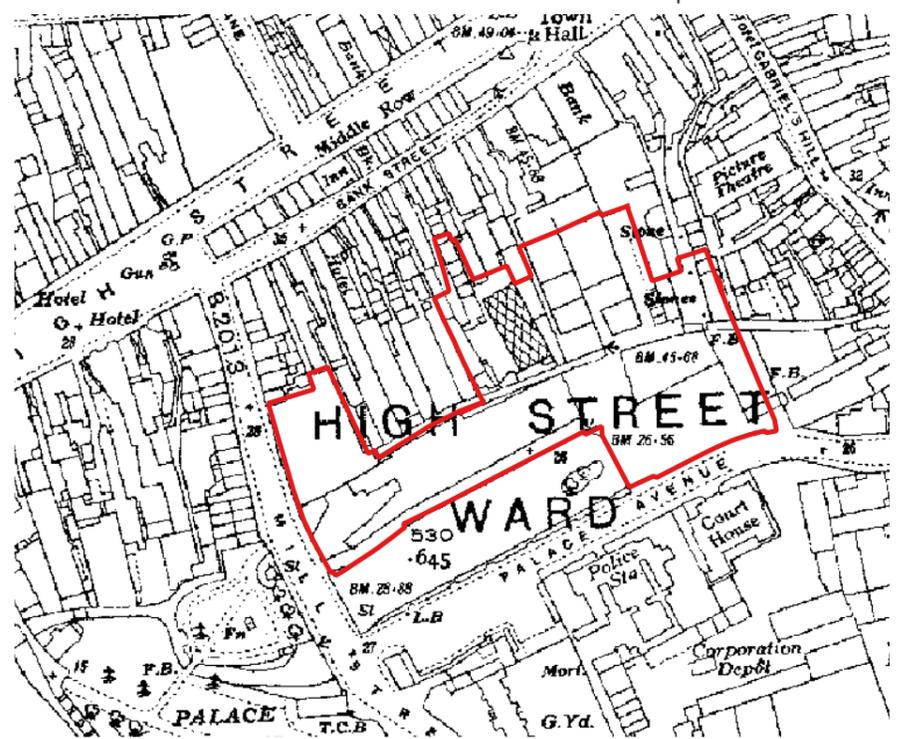
Ramp from ground to first floor.



Historic Map: 1876-1895



Historic Map: 1896-1898



Historic Map: 1936-1946

Figure 3.4 Historic Mapping

3B:04 Landform and Hydrology

The site occupies a sloping site, rising from approximately 7.5m Above Ordnance Datum (AOD) in its south-western area to approximately 11m AOD in its northern corner (see Figure 3.6). This level change is reflected in the presence of some low retaining walls within the parking area in the northern part of the site.

The majority of the listed building and used cars sales area and the south-west part of the northern parking area lies within the Environment Agency Flood Zone 3, meaning it is at high risk of flooding (3.3% chance of flooding in any one year). The south-west corner of the northern parking area lies within Flood Zone 2, meaning it has a flood risk of between 0.01% and 1% in any year. The northern part of the site does not lie within a Flood Risk Zone. Any planning application would need to be accompanied by a Flood Risk Assessment and appropriate mitigation measures.

The historic changes to the River Len and Mill Pond mean that there are some culverted water-courses within and adjacent to the site, including the part of the used car sales area immediately adjacent to the River Len. It is unlikely that it would be viable/structurally practical to build on this. If costs permitted, it would significantly enhance the public realm of Palace Avenue and this part of the site if this part of the River Len could be opened up again to create an additional length of waterfront.

Given its town centre location and the proximity of Palace Avenue a noise, air quality and land contamination assessments may be required as part of any planning application together with the delivery of appropriate mitigation measures.



FLOOD RISK ZONES:

-  Flood Zone 3: < 3.3% chance of flooding per year
-  Flood Zone 2: 0.1-1% chance of flooding per year
-  Built Form

-  Maidstone West Railway Station
-  Site

Figure 3.5:Hydrology



-  Built Form
-  Contour 5m
-  Railway
-  Primary Road
-  Train Station
-  Water Bodies
-  Study Area

Figure 3.6 Landform

3B:05 Easements and Conveyances

There are a number of covenants relating to rights of light and the heights of any new buildings on parts of the site. It is recommended that legal advice should be gained prior to detailed design.

A number of foul water sewers pass through the site:

- across the Mill Street forecourt
- from Mill Street to the rear of properties on Gabriel's Hill, through the Mill Pond and on through the used car sales area (culverted river/Mill Pond)
- in a north-east direction to the north of Len house between Mill Street and Gabriel's Hill. This runs through the southern part of the Mill Street block of Len House
- a short stretch of sewer also links this sewer to the electricity sub-station beyond the north-east of the site

A surface water drain runs through the site to the north of the main eastern block of Len House, between Mill Street and Gabriel's Hill. This comes through the western part of this eastern block, in the vicinity of its vehicular access.

These drains and sewers on the eastern side of the site may be a particular constraint to construction here and it is recommended that suitable technical advice be sought prior to detailed design. These may require diversions or build over agreements.

Vehicular access to the site off Palace Avenue runs over part of the river culvert. Depending on the proposed use, this may result in weight restrictions to vehicles accessing the site or require reinforcement of the culvert. Further surveys will be required.



Right of access to Bank Street (currently fenced off)



Palace Avenue frontage: culverted River Len in this area will limit development options in this part of the site

3B:06 Movement



Maidstone West Station



Arriva bus services

The western part of the site fronts onto Mill Street, a two-way commercial street situated to the south of Maidstone town centre, connecting the High Street to the north with the A229 and Palace Avenue to the south. Whilst vehicles can travel in both a northbound and southbound direction along Mill Street, the northbound lane is restricted for use by bus and cycles only, leaving the southbound lane the only available lane for all traffic. In effect, the majority of all road users would consider Mill Street to be one-way.

Mill Street is subject to 30mph speed restrictions for the majority of its length; however, to the north of the street, near to the junction with the High Street, the speed restriction is lowered to 20mph.

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To the south and south-west, Palace Avenue and Bishops Way respectively form part of the main circular route around the town centre. These busy one way streets act as a barrier to pedestrians, although signalised pedestrian crossings are provided at their junction with Mill Street. This large junction creates an extensive area of highway infrastructure that dominates the setting of both Len House and the listed Gatehouse to the Archbishop's Palace to the south west.

The site lies on the southern edge of the heart of Maidstone town centre and is sited less than 0.4km walking distance from Maidstone West Station as the crow flies. The closest bus stops are on Mill Street immediately outside Len House. These serve eight bus routes.



Figure 3.7 Movement and Access

- | | | |
|----------------|----------------------------------|---|
| ■ Railway Line | — Pedestrian Street | 🚏 Bus Station |
| — A Roads | 🚶 Public Rights of Way | ⊙ 400m radius (5 min. walk) from Station |
| — B Roads | 🚂 Train Station | ⊙ 800m radius (10 min. walk) from Station |
| — Minor Roads | 🚌 Bus Routes | ○ Site Boundary |
| ⋯ Local Street | 🚗 Maidstone East Station Carpark | |

In terms of the pedestrian environment, Mill Street benefits from footways extending in both directions from the site entrance, with street lighting. To the north and south of the street, signalised pedestrian crossings allow for a safer crossing of the highway. These crossings benefit from appropriately coloured tactile paving and are provided at grade.

The north of Mill Street is an 'unsigned cycle route' on the 'Explore Maidstone' map (produced by Explore Kent, a Kent County Council led partnership initiative). This is described as being: "a route that is useful for cyclists to link up their cycle journeys." It is therefore not a designated route but deemed suitable for cycling.

Maidstone has good transport links, with direct connections to London and the channel tunnel via the M20 and M2 motorway, and rail connections to London, the coast and Medway towns through three central railway stations in the town. There are approximately six trains per hour departing from Maidstone East Railway Station, including direct connections to London Victoria and Ashford International, with interchanges to a number of destinations available. Expected improvement to links direct to the City of London via Thameslink in 2019, will further improve the site's connectivity and attraction as a commuter location, whilst improvements to Maidstone East and West (HS1) stations could further unlock potential. The site

is an approximate 10 minute walk from Maidstone East Station. Further details on connectivity with Maidstone's railway stations and bus stations are provided at Appendix 3D.

The closest taxi ranks are on High Street and King Street, 140m to the north.

There are two vehicular access points to the site, one off Mill Street and one off Palace Avenue. A further access route from Palace Avenue is possible, via an existing drive to the east of the site that is also within Peugeot's ownership. This also allows the potential for connecting with existing pedestrian routes to Gabriel's Hill to the west. There are also two pedestrian rights of access between the site and Bank Street. The western one connects to the glass covered workshop to the rear of the Mill Street block whilst the other connects to the northernmost part of the rear (northern) parking area, on its western side. Both are currently gated off to prevent public access.

Further details on connectivity with Maidstone's railway stations and bus stations are provided at Appendix 3D.

3B:07 Landscape and Visual Context

The site has a hard, urban character, with the only vegetation being some overgrown scrub on the eastern side of the River Len, overgrown ornamental shrub beds to the north and east of the used car sales area and low shrub planting along the Palace Avenue frontage of the used car area. There is also a self-seeded tree and small amount of scrub along the northern boundary. There is a row of coniferous trees along the western boundary of the northern parking area and also immediately adjacent to part of the northern side of the eastern building. Clarification is required as to the management responsibility/ownership of these trees. The parking areas are covered entirely by asphalt or concrete. The northern car parking area is enclosed by tall palisade security fence.

To the south of the site, there are some areas of self-seeded scrub along the River Len, both on an island within the mill pond as well as along its Palace way frontage.

The immediate wider area similarly has a hard urban character, with the expanse of road infrastructure on the A229 Palace Avenue/Bishops Way to the south and south-west and the predominance of terraced shops on Mill Street and the wider town centre to the north. To the south-west, the Carriage Museum and Bishops Palace have associated gardens which soften this area and provide recreational amenity space.

With regards to its visual context, the site is clearly visible from the A229 to the south and, given its size and art deco style is a memorable landmark from this immediate area. The River Len also provides an attractive setting to the building and unusual town centre waterfront walk. The site is generally not visible from the north or east other than from buildings with windows immediately backing on to the site. There is also an oblique view of the western part of the building from the top end of Mill Street.

If developed with taller buildings, there is the potential for views to be gained from the wider area, especially Bank Street and High Street. Given that this area lies within the Maidstone Centre Conservation Area and includes a lot of listed buildings it will be important to ensure that their settings are respected. It would not be appropriate for example, for new buildings to break the skyline of Bank Street when viewed from the north.

Particular attention should be paid to the visual setting of Len House itself and any new development within its setting would also have to respect the setting and integrity of the listed building, and would need to be subservient to it. As described in both the Maidstone Centre Conservation Area Appraisal and Maidstone Town Centre Study, this would best be achieved by restricting the heights of new buildings to four storeys.



Mill Street, looking north



Junction of Palace Avenue, Bishop's Way and Mill Street



Mill Street, looking south



Palace Avenue, looking west



Len House, looking west from the roof of The Mall car park

Site 3: Len House

Appendix 3C: Heritage Review

Heritage Review

Len House, also known as the Rootes building, is Grade II listed and also sits within the Maidstone Centre Conservation Area. The building was first listed in October 2009 for the following principal reasons:

- The building is of architectural interest as an example of a Modernist motorcar showroom and workshops which retains a significant proportion of its original fabric
- The building is of architectural interest due to its grand scale, town-centre location and picturesque setting adjacent to the Len mill pond, which distinguishes it from other buildings associated with the motorcar industry during this phase of early motoring
- The building is a prominent manifestation of a hugely successful British car manufacturer, built in a period when the expansion of car ownership was having a revolutionary impact on the physical and social fabric of the nation

This iconic Art-Deco building is built over two storeys with a flat roof and parapet to the front (facing Mill Road) and a saw-tooth roof with corrugated covering to the rear. The east block is over two floors but a mezzanine level at the west end results in two rows of upper windows on the west elevation. Internally, the workshops are largely open plan with the vehicular ramp between ground and first floor being a principal

feature. The concrete and steel structure of the building is undisguised; at ground floor concrete cross beams rest on large columns, supporting the first floor above, at first floor the workshops are open to the roof. A number of original staircases remain throughout the building, mainly characterised by curved steel-strip balusters with wood or metal hand rails, as well as a curved mezzanine viewing gallery (now enclosed) in the south-east corner of the showroom.

At the time of its opening in April 1938, the showroom was considered the largest and most up to date in Kent; at night 700ft of neon tubing outlined the frontage and spelled out the name 'ROOTES' on the tower above the main entrance. The size of the Rootes showroom floor, uninterrupted by supporting columns, combined with an elegant, streamlined exterior glowing with neon light, would have made an impressive sight. The Rootes complex was referred to as a '*palace of modern motoring*'.

Within the Maidstone Centre Conservation Area Appraisal (2009) the Rootes building is described as being redeveloped in the 1930s as 'large and impressive state-of-the-art showrooms and workshops which remain such an important feature of the Conservation Area today' (p.22) and is further noted as constituting '*an iconic building now of great townscape importance*' (p.82). It is therefore a sensitive site and

any development at the site needs to respect the dominance of the listed building and the integrity of its setting externally, as well as best preserving also those internal features which are highlighted in the listing description as being significant, such as the internal ramp.

Few buildings within the Conservation Area as a whole exceed three storeys in height and the Rootes building is named as one of the landmark buildings within the town and Conservation Area, described as ‘sitting attractively alongside the Mill Pond at the southern entrance to the Conservation Area...’ (CAA, 2009, p.29). Most development within the Conservation Area is still of two to four storey height with only a few modern exceptions to this, which are generally appraised as making a negative contribution to the Conservation Area, and further the CAA states that ‘it is unlikely that in any location development above four storeys will be considered acceptable’ (ibid. p.103).

Planning Policy Context

In Planning Policy terms, the newly revised NPPF (February 2019) Chapter 16 (Conserving and Enhancing the Historic Environment) states at para 192 that “In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with

their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and , c) the desirability of new development making a positive contribution to local character and distinctiveness.”

Para 193 of the revised NPPF states that “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

Para 194 of the revised NPPF states: “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.” It further goes on to state that substantial harm to or loss of grade II listed buildings should be exceptional.

Para 196 states that: “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.” However, as noted at footnote 62 of the



Rear ground floor showroom, Mill Street



Former snooker club, first floor Mill Street



Workshop, Palace Avenue frontage



North elevation



Palace Avenue/Mill Street: potential for riverside space



West elevation (used cars sales)

revised NPPF, the policies set out in chapter 16 relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making. In particular, Section 66 states *“In considering whether to grant planning permission [or permission in principle] 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.”*

Similarly, Section 72 states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area, although the revised NPPF 2018 does state at para 200 that: *“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably”,* and also goes on to state at Para 201 *“Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the*

Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.”

Finally, para 202 of the NPPF 2018 states that *“Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.”*

A new addition to the NPPF at para 198 states that *“Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred”,* thus making viability assessments a key part in balancing the decision making process. In terms of finding an ‘optimum viable use’ for heritage assets this will not always be the most profitable solution, but the one which delivers a viable outcome with the least harm to the asset, and secures a sustainable future.

In local planning policy terms, the MBLP sets out the framework for development in the borough until 2031. Relevant policies include SP4 Maidstone

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Town Centre; SP18 Historic Environment; and H2 (1) Maidstone Town Centre broad location for housing growth. Policy DM1 Principles of good design is also relevant, stating: *“In order to achieve high quality design, it is expected that proposals will positively respond to and, where appropriate, enhance the character of their surroundings. It is important that development contributes to its context...Key aspects of built development will be the scale, height, materials, detailing, mass, bulk and site coverage...These features should relate well, and respond positively, to the context in which they are seen....New development should integrate well into the built, natural and historic environment..”* Para 6.5 of policy DM1 also notes that *“In assessing the appropriateness of design, the council will have regard to adopted Conservation Area Appraisals and Management Plans, Character Area Assessments and the Kent Design Guide, which provide specific information about local character and distinctiveness and give guidance on design principles.”* Policy DM4 details the approach to Development affecting designated and non-designated heritage assets, which defers to national legislation (P(LBCA) A 1990 and NPPF 2018).

In terms of redevelopment at the Len House Site, it is clear that there needs to be a balance struck between conserving the key elements of the Rootes building which contribute to its significance and setting, and also finding an Optimum Viable Use (OVU) for the Len House complex. The key elements which contribute

to its significance are those which originally led to the Rootes building being described as the ‘palace of modern motoring’: the clear 1930s Art Deco architectural expression of the exterior of the building, particularly on its western and southern elevations fronting onto Mill Street and overlooking Len Pond, which were once illuminated with 700ft of neon tubing outlining the frontage; the plan form of the building, including the size and open heights of the original showroom floor, uninterrupted by supporting columns (which are still intact) and combined with the elegant streamlined exterior; the tower above the main entrance (once illuminated with ‘Rootes’ in neon lights), and the survival of a significant proportion of its original fabric, particularly within the interior. The internal ramp is described in the listing description as a ‘principal feature’ and therefore there would have to be clear and convincing justification to permit its loss where there are alternative schemes which would allow its retention. The interior of the building, despite the insertion of some modern partitioning (reversible), retains its original supporting columns, staircases, with curved steel-strip balusters with wood or metal handrails, curved mezzanine viewing gallery and even the tannoy system and speakers used to relay messages to the workshop floor. Its concrete and steel structure is undisguised; floors are of reinforced concrete with Terrazzo, rubber and grano finishing; and steel casement windows are retained throughout. Any redevelopment works should seek to conserve and enhance the

exterior and interior features where possible and find an optimum viable use which causes the least harm to the heritage asset.

Any new development within the setting of the Rootes building would also have to respect the setting and integrity of the listed building, and would need to be subservient to the Listed building. The building also lies within the Maidstone Town Centre Conservation Area and within the setting of several listed buildings: Nos.16-20 and No.22 Mill Street (both Grade II-listed) to the west; Grade II Nos. 69, 70, 74-75, 76-77, 79-81, 82, 83-84, 86, 87-88, 89 Bank Street (all Grade II) and Nos. 78 and 85 Bank Street (both Grade II*) to the north; and Nos.16-18 and No.20 Gabriel's Hill (both Grade II), No.2 Lower Stone Street (Grade II) and Nos.2-6 Palace Avenue (Grade II) to the east. To the south-west of the site are the Tithe Barn (Grade I), the Len Bridge (Grade II), the Gate House (Grade II), the Archbishop's Palace (Grade I) and All Saints Church (Grade I); which all make up part of the All Saints Conservation Area, which also forms part of the building's setting.



Site 3: Len House

Appendix 3D: Connectivity with Public Transport

Distances & Journey Times to Bus Stops & the Bus Station*

Bus Stop	Location	Distance	Mode		
			Walk	Cycle	Number of Services Within a 20-Minute Walk
Gala Bingo / Granada House / The Mall					
Mill Street	Mill Street	300m	4-Minutes	2-Minutes	71
Chequers Bus Station	Romney Place	150m	2-Minutes	1-Minute	
Mote Road					
Lower Stone Street	Lower Stone Street	240m	3-Minutes	1-Minute	70
Chequers Bus Station	Romney Place	400m	5-Minutes	2-Minutes	
Peugeot Building (Len House)					
Mill Street	Mill Street	17m	1-Minute	1-Minute	71
Chequers Bus Station	Romney Place	450m	5-Minutes	2-Minute	
Maidstone Riverside					
Rocky Hill	A20 London Road	400m	5-Minutes	2-Minutes	71
Chequers Bus Station	Romney Place	1km	13-Minutes	4-Minutes	
Maidstone West Station					
Broadway	A20 Broadway	270m	3-Minutes	1-Minute	71
Chequers Bus Station	Romney Place	1km	11-Minutes	3-Minutes	

*(Markides Associates, June 2018)

Distances & Journey Times to Maidstone Rail Stations*

Rail Station	Distance	Mode		
		Walk	Cycle	Public Transport
Gala Bingo / Granada House / The Mall				
Maidstone Barracks	1.2km	15-Minutes	6-Minutes	13-Minutes via Maidstone West
Maidstone East	750m	9-Minutes	4-Minutes	9-Minutes via Kings Hill Connect X1 / Sapphire 101 / 130 / 150
Maidstone West	800m	10-Minutes	3-Minutes	8-Minutes via 503 Maidstone P&R / Greenway 71 / Greenway 72 / 3 / 7
Mote Road				
Maidstone Barracks	1.5km	18-Minutes	7-Minutes	16-Minutes via Maidstone West or 15-Minutes via Greenway 71 / Greenway 72 / 58
Maidstone East	1km	12-Minutes	6-Minutes	10-Minutes via Sapphire 101 / 155
Maidstone West	1km	13-Minutes	4-Minutes	7-Minutes via Greenway 71 / Greenway 72 / 3 / 7
Peugeot Building (Len House)				
Maidstone Barracks	1.2km	14-Minutes	5-Minutes	10-Minutes via Maidstone West or 12-Minutes via Greenway 71 / Greenway 72 / 79A / 79C
Maidstone East	800m	10-Minutes	4-Minutes	10-Minutes via Kings Hill Connect X1 / Sapphire 101 / 79 / 155
Maidstone West	550m	7-Minutes	3-Minutes	5-Minutes via 503 Maidstone P&R / Greenway 71 / Greenway 72 / 1 / 3 / 6 / 6X / 7 / 8 / 79A / 79C
Maidstone Riverside				
Maidstone Barracks	500m	7-Minutes	2-Minutes	n/a
Maidstone East	950m	12-Minutes	5-Minutes	12-Minutes via Sapphire 101 / 79 / 150 / 155
Maidstone West	550m	7-Minutes	4-Minutes	n/a
Maidstone West Station				
Maidstone Barracks	1.1km	14-Minutes	6-Minutes	14-Minutes via Greenway 71 / Greenway 72 / 58 / 60 / 78 / 79A / 79C
Maidstone East	1.2km	16-Minutes	8-Minutes	12-Minutes via Kings Hill Connect X1 / Sapphire 101 / 79 / 150 / 155
Maidstone West	270m	3-Minutes	1-Minute	n/a