



Delegated Report

Listed Building Consent Application

Planning Application No: 20260546

Location: Gads Hill House School Gravesend Road Higham Rochester

Description: Application for Listed Building Consent; opening of helical stair lining to allow structural investigation.

Applicant: Mr Malcolm Gray

Site Visit Date: Desktop

Submitted Documents/Plans

- Application form;
- Drawing no. D-00 – Site Location Plan;
- Drawing no. D-07 – Mansion House Ground, 1st and 2nd Plans indicating area of investigation for SE;
- Drawing no. D-08 – Mansion House Ground First and Second Helical Stair Plans;
- Helical Stair – Heritage Report;
- Drawing no. SK200 - Building Layout showing Ground to 1st floor stair (not to scale); and
- Photographic Record of Helical Stair.

Relevant Planning History

Reference	Description	Decision	Decision Date
20250370	Application for Listed Building Consent; removal of floorboards to examine the floor joists. The floorboards will be replaced once investigations have been carried out.	Permitted	10.10.2025
20240889	Application for the approval of condition 3.2 and 4.2 attached to planning reference number 20230281 relating to cupola repairs.	Approval of details	26.11.2024
20230281	Application for Listed Building Consent for roof and ceiling repairs to classroom H1 and library extension; repairs to cupola and boundary garden wall; take down and rebuild garden shed; repairs to Gardener's Cottage chimney; and replacement self-supporting front boundary fence to Gravesend Road	Permitted	19.10.2023
19780877	Various internal structural repairs in the ground floor study the removal of a chimney flue oversailing and the lowering of a chimney stack on the north eastern corner	Permitted	19.12.1978

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS19 – Development & Design Principles

- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- TC2 – Listed Buildings

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

Other material considerations

Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be had to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses when considering whether to grant listed building consent.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 12 – Achieving Well-Designed Places
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

None.

Emerging Local Plan as a Material Consideration

Paragraph 48 of the Framework makes it clear that planning applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise. An emerging Local Plan, does not form part of the Development. The Framework, at Paragraph 49 allows local planning authorities to give weight to relevant policies in emerging Local Plans, according to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of consistency of the relevant policies in the emerging plan to the Framework, the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given to those policies.

West Oxfordshire District Council v Secretary of State for Housing, Communities and Local Government & Rosconn Strategic Land Ltd [2018] EWHC 3065 (Admin) is a High Court judgement that deals with the weight to be given to a Regulation 19 Local Plan. In this judgement the Court found that the weight to be given to an emerging Local Plan, was a matter of planning judgement, which had to be reached having fully considered the relevant part (Paragraph 49) of the Framework.

The Council's emerging Local Plan, is in the process of being consulted upon (it has reached Regulation 19 stage), the Council is not yet aware of whether third parties will support or object to specific policies within the Plan, or whether they will consider the policies with the emerging Local Plan to be broadly sound and consistent with the NPPF (2024). Taking this into consideration, one can only conclude that at this stage of the process, **limited (i.e. minimal) weight should be afforded to the**

emerging Regulation 19 Local Plan. This position would only change once the emerging Local Plan has progressed towards submission and examination, with the Council being fully aware of policies that are subject to unresolved objections and with knowledge of policies that have had their soundness and conformity against the Framework challenged.

This approach accords with the approach taken in a separate High Court case, Gladman Developments Ltd v SSHCLG & Corby Borough Council; & Uttlesford DC [2020] EWHC 518 (Admin) and Court of Appeal [2021] EWCA Civ 104, which was also the subject of a Court of Appeal Ruling [2021] EWCA Civ 104.

Consultations, Publicity and Representations

Consultees

GBC Conservation Officer

I have no objection in principle to the temporary opening-up works proposed, which are reasonably necessary to allow the structural engineer to inspect the condition of the stair stringers, supports and connections at the wall interface, and I note the sensitivity with which this exploratory work has been described.

However, I have a concern regarding the long-term treatment of the opening once investigations are complete. The submitted Heritage Report and drawings (D-07, D-08) describe the exposed area being fitted with a removable white plaster panel with ply backing (or "removable white panel," per the drawings) to allow the investigation to be carried out and concluded. No details have been provided as to how, or whether, the historic plaster soffit will subsequently be permanently reinstated to match the surviving original fabric once the structural findings are known and any remedial works are complete.

A removable inspection panel may be acceptable as an interim measure while investigations and any resulting repairs are ongoing, but it would not be an acceptable permanent condition for this Grade I listed building. I would not wish to see a modern removable panel left in place indefinitely as the finished solution, nor a mismatched or unauthorised reinstatement carried out without further scrutiny once the below-stair works are complete.

I would therefore recommend that:

Details of the permanent reinstatement of the plaster soffit (including specification of lime plaster mix, finish, and making-good to match the surviving historic fabric) be submitted to and approved in writing by the Local Planning Authority prior to that work commencing – this could be secured by planning condition, or, if the reinstatement details are not yet known, dealt with via a further listed building application once the outcome of the structural investigation and any repair scheme is known.

The temporary removable panel be explicitly limited in duration – i.e. it should not be treated as an acceptable end state – with reinstatement of the soffit required within a specified period following completion of the structural investigation and any approved repair works, unless otherwise agreed.

The applicant confirms whether the removable panel is intended to remain accessible for future monitoring (in which case its design, size and finish should also be agreed) or whether it is purely a temporary measure pending full reinstatement.

I would be grateful if these points could be raised with the applicant/agent (DAC Architects) so that a commitment to permanent, like-for-like reinstatement of the plaster soffit is secured as part of this consent, rather than left open-ended.

Historic England

Summary

The application relates to limited investigative works to the principal helical staircase at Gads Hill Place, a grade I listed building and the former home of Charles Dickens.

The proposed works comprise a small-scale, reversible intervention within a concealed area of the building and would result in no harm to its special architectural or historic interest.

The investigations will inform future repairs and support the long-term conservation of the staircase and the wider heritage asset. The proposals are consistent with Historic England's conservation principles and the objectives of the National Planning Policy Framework (NPPF) and are therefore considered both justified and beneficial.

Historic England Advice

Description of the Proposals

The current proposal forms part of a wider programme of condition assessment and planned maintenance intended to ensure the continued safe operation of the school.

This phase of works concerns the structural investigation of the principal helical staircase in order to better understand its construction and condition and to support its long-term conservation.

The works involve localised opening-up of the plaster soffit beneath the staircase between ground and first-floor level. This will expose the structural supports and allow inspection of the stair construction, including the strings, treads and associated joints.

Following the investigation, the opening would be enclosed with a discreet removable access panel to facilitate future inspection and monitoring. The findings of the investigation will inform any subsequent programme of repair or remedial works that may prove necessary.

Significance of the Site

Gads Hill Place is a distinguished late eighteenth-century country house of exceptional national significance. Its importance derives from its architectural quality, historic fabric and, above all, its close literary association with Charles Dickens.

Built in 1779 for Thomas Stevens, former Mayor of Rochester, the house is a remarkably well-preserved example of a late Georgian villa occupying a prominent hilltop position with extensive views across the Medway Valley and surrounding countryside. The acquisition of the house fulfilled Dickens's lifelong ambition and it became his principal residence during the final years of his career. It was here that he wrote or completed several of his most important works, including *Great Expectations*, *Our Mutual Friend* and *The Mystery of Edwin Drood*. The surrounding landscape also informed his writing, most notably the opening scenes of *Great Expectations*.

The house retains important evidence of Dickens's occupation, including his study, which survives substantially intact. The property also preserves elements of the alterations he introduced, such as the conservatory extension and the tunnel linking the house to the former site of his Swiss chalet.

The helical staircase, distinguished by its elegant sweeping form, is also an important historic feature of the house and appears to date from the original construction. The decorative infill panels inserted between alternate balusters are thought to have been painted by one of Dickens's daughters following the removal of the original spindles. These alterations reflect his desire to personalise the interior and express the family's individual tastes, contributing to the staircase's particular historic and associative significance.

Beyond its literary associations, Gads Hill Place possesses considerable architectural and aesthetic value as a well-composed Georgian villa whose elevated setting contributes strongly to its character and landmark quality.

The combination of its architectural interest, historic fabric and direct connection with one of Britain's greatest novelists makes Gads Hill Place one of the most significant literary houses in England, fully justifying its grade I designation.

Impact of the Proposals on Significance

The proposed works are limited to a small area of concealed fabric beneath the principal staircase and are intended solely to facilitate investigation of its condition and structural performance.

No significant historic fabric or features of special architectural or historic interest would be lost, altered, or obscured. The proposed opening-up works represent the minimum intervention necessary to gain an understanding of the staircase's construction and condition, while the subsequent installation of a removable access panel will allow future monitoring without further disturbance.

The proposals would deliver a clear conservation benefit by informing any future repair works and helping to safeguard an important historic feature of the building. Overall, the works would preserve the special interest and significance of the grade I listed building and support its long-term conservation.

Historic England's Position on the Proposals

We support the proposals, as these accord with Historic England's published conservation principles and guidance, which advocate a proportionate, evidence-based approach to the management of historic buildings. Historic England recognises that investigative and opening-up works may be necessary to understand the condition, construction and significance of historic fabric, particularly where such understanding is required to inform appropriate repair and long-term conservation strategies.

The proposals also align with the National Planning Policy Framework (NPPF). Paragraph 202 identifies heritage assets as an irreplaceable resource that should be conserved in a manner appropriate to their significance, while paragraph 203 emphasises the desirability of sustaining and enhancing the significance of heritage assets and securing their long-term conservation.

The proposed works embody the conservation principles of minimum intervention and reversibility. The opening-up is limited to a small, concealed area of the stair soffit, and the installation of a removable access panel will facilitate future monitoring while avoiding the need for repeated intrusive investigations.

The proposals therefore support the overarching objectives of both Historic England guidance and national planning policy by enabling informed stewardship of an exceptionally significant heritage asset.

Recommendation

Historic England recommends that your Council should approve this application, which would secure the conservation of Gads Hill Place, unless it finds that other considerations would outweigh this benefit.

Publicity

The application was advertised by way of site and press notices – overall consultation expiry date was 27.07.2026 – no responses received.

Officer's Analysis

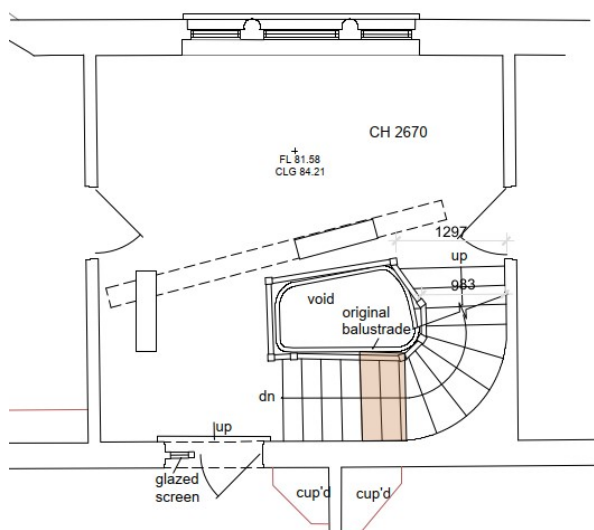
The application site consists of Gads Hill House situated on the southern side of Gravesend Road. It is a grade I listed building in use as a private school.

The proposal is for listed building consent for the opening up of a small area of the helical stair lining to allow structural investigation. It is said that the proposal has arisen as the architect is working with Gads Hill school to identify and address priority maintenance issues that require attention within the school premises to assist in creating a continued safe environment for the school to operate within; the investigation work to the stair forms part of this wider brief. Reference is made to it being previously established that the stair requires further investigation to ensure its longevity and this listed building consent application for structural investigations will enable the further inspection of the helical stair.

The area to be opened up is on the underside of the plaster stair soffit at the part of the stairwell which runs from the ground to first floor level as outlined in the below plan:



Area to be opened up
for structural investigation
Refer to ASP C/332
SK200



The area where the opening up is proposed is as follows:



The area will be cut out to the full width of the stair to expose stair support connections at the wall interface and to report condition on the condition of the stairs, stringers and joinery connections of the stair.

The exposed area is to be provided with a removable white plaster panel with ply backing to allow investigations to be carried out and concluded and subject to the findings, this will inform any subsequent programme of repair or remedial works.

The principal consideration in the assessment of this application is whether the proposal would protect the architectural and historic interest of this grade I listed building.

It is known from previous applications for Gads Hill that a condition survey carried out in 2022 found that the mansion is severely overused with students imposing loads on the building it was not designed or built for. The floors, ceilings and central staircase were said to generally be in a poor condition and will deteriorate further if not dealt with by the end of 2027. The proposal for opening up to investigate further the condition of the staircase is therefore welcomed.

Historic England consider that the proposed works are limited to a small area of concealed fabric beneath the principal staircase and are intended solely to facilitate investigation of its condition and structural performance. They advise that no significant historic fabric or features of special architectural or historic interest would be lost, altered, or obscured; that the proposed opening-up works represent the minimum intervention necessary to gain an understanding of the staircase's construction and condition; and the subsequent installation of a removable access panel will allow future monitoring without further disturbance. They advise that the proposals would deliver a clear conservation benefit by informing any future repair works and helping to safeguard an important historic feature of the building and that overall, the works would preserve the special interest and significance of this grade I listed building and support its long-term conservation.

The Conservation Officer raises no objection stating that the proposed works are reasonably necessary to allow the structural engineer to inspect the condition of the stair stringers, supports and connections at the wall interface, and they note the sensitivity with which this exploratory work has been described.

The Conservation Officer does however, raise concern regarding the long-term treatment of the opening once the investigations are complete and states that no details have been provided as to how, or whether, the historic plaster soffit will subsequently be permanently reinstated to match the surviving original fabric once the structural findings are known and any remedial works are complete. They state that whilst a removable inspection panel may be acceptable as an interim measure while investigations and any resulting repairs are ongoing, it would not be an acceptable permanent condition for this Grade I listed building; and they would not wish to see a modern removable panel left in place indefinitely as the finished solution, nor a mismatched or unauthorised reinstatement carried out without further scrutiny once the below-stair works are complete. The Conservation Officer therefore recommends that

Details of the permanent reinstatement of the plaster soffit (including specification of lime plaster mix, finish, and making-good to match the surviving historic fabric) be submitted to and approved in writing by the Local Planning Authority prior to that work commencing;

The temporary removable panel be explicitly limited in duration – i.e. it should not be treated as an acceptable end state – with reinstatement of the soffit required within a specified period following completion of the structural investigation and any approved repair works, unless otherwise agreed. The applicant confirming whether the removable panel is intended to remain accessible for future monitoring (in which case its design, size and finish should also be agreed) or whether it is purely a temporary measure pending full reinstatement.

The case officer wrote to the agent regarding the above and the agent advised that:

- The temporary panel and opening up works is purely intended to investigate the internal structure and status of the stair with a view to report their findings and if necessary, propose additional work to repair and strengthen the stair with discreet interventions. They advise that any additional work would form part of a separate Listed Building application once they are in a position to review and report our findings;
- Once they have reached this stage and have hopefully obtained approval for any additional work the soffit of the stair would be reinstated with a like for like repair; returning the stair to its original condition;
- The time period for opening up, structural investigation and redesigning any further repair work would be carried out diligently and they would keep the LPA fully informed throughout;
- They would be happy to agree to a condition that noted the return of the stair to its original condition subject to further approval of our investigations and proposed additional work to strengthen the stair, via a separate Listed Building Application;

- To determine a time period for this process is hard to ascertain at the moment as any additional work would be subject to their review and a further application and approval. This said they would be happy to receive a suggested timeframe or an acceptance that further proposals would be received by a certain date after the opening up work is approved.

In order to address the Conservation Officer's concerns and ensure that the temporary removable panel is only that (i.e. temporary) and does not remain permanently, the following condition is recommended:

Within two months of the completion of the investigation work of the stairs, and any subsequent repair/remedial works (for which separate Listed Building Consent may be required), details of the permanent reinstatement of the plaster soffit (including specification of lime plaster mix, finish, and making-good to match the surviving historic fabric) shall be submitted to and approved in writing by the Local Planning Authority. Within six months of the approval of the details, the temporary removeable inspection panel shall be removed and the plaster soffit shall be permanently reinstated in accordance with the approved details.

Subject to this condition it is considered that the architectural and historic interest of this grade I listed building would be protected.

Any Other Material Planning Considerations

None.

Conclusion

The proposal is welcome in order to investigate in more detail the condition of the staircase and ensure its future preservation. Subject to condition as above, the proposal would protect the architectural and historic interest of this grade I listed building. The proposal is therefore compliant with local and national planning policy.

Recommendation

Permission

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Ms Rebecca Harrison	Team Leader:	Richard Hart
Signed:	<i>Rebecca Harrison</i>	Signed:	<i>R Hart</i>
Dated:	4th August 2026	Dated:	5 th August 2026