



LONDON OFFICE

Ms Rebecca Harrison
Gravesend Borough Council
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Windmill Street
Gravesend
DA12 1AU

Direct Dial: 020 7973 3635

Our ref: P01597681

23rd September 2025

Dear Ms Harrison

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**GADS HILL HOUSE SCHOOL GRAVESEND ROAD HIGHAM ROCHESTER KENT
ME3 7PA
Application No. 20250863**

Thank you for your letter of 3rd September 2025 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Background

Gads Hill House has been in use as an independent school since the early 1920s and several extensions to the site were made over the years to provide associated facilities.

In particular, in 2002, additional classrooms were urgently required. After failing to acquire a neighbouring property, the school resolved to construct a temporary structure, awaiting the development and construction of a new permanent building. Planning permission was granted in 2003 for a period of three years for the Hewlett Pavilion to the south-east of the listed building, providing five classrooms, offices and storerooms (ref: 20030276). This temporary consent was renewed in 2006 (ref: 20060385), and again in 2009 (ref: 20090076).

A wider scheme to improve facilities was conceived in 2010, including a new junior block and a senior block in the grounds of the listed building, with the intention of relocating classrooms from the Pavilion and converting Gads Hill Place into a Dickens Visitor Centre. Consent was granted (refs: 20070188 and 20070189) but only the junior block was eventually built.



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In 2016, temporary planning permission was again secured for the retention of the Pavilion for three years or until the senior school element of the approved building programme was complete (ref. 20160271).

The construction of the senior block was finally deemed unviable and a subsequent application in 2020 for the permanent retention of the Pavilion was refused (ref: 20200385), with the appeal dismissed in 2021 (ref: APP/K2230/W/20/3261674), partly on heritage grounds. The Pavilion was considered, by virtue of its location, size, utilitarian appearance and bright materials, overly prominent and incongruous within the setting of Gads Hill Place, causing harm to the significance of the listed building and to the designated Shorne Woodlands, part of the Kent Downs National Landscape.

An alternative phased masterplan for the senior school was developed in 2022-23 but was not progressed beyond pre-application stage. The scheme included leasing the historic house to a charity as a heritage and educational resource, celebrating the life and work of Charles Dickens.

Historic England Advice

Significance of the Site

Gads Hill Place is a fine example of a late 18th-century, middling-sized country house, prominently located on a hilltop, which allows dramatic views of the Medway valley and surrounding countryside.

Originally built for Thomas Stevens, Mayor of Rochester, it became Charles Dickens's country retreat from 1857, for the last 14 years of his life. The renowned novelist was particularly fond of this house, having admired and aspired to own it since childhood. Here, in his preserved study, Dickens wrote many of his major works, including *Great Expectations*, whose opening scenes are set in the locality.

The author undertook many works both to the house and garden, including the construction of a large conservatory to the south-east of the the dining room, raising the floor of his bedroom above, and erecting a Swiss chalet in the wilderness accessed via a tunnel beneath the main road.

The association with one of greatest British novelist of the Victorian era gives the site exceptional historic and cultural significance on a national scale. This value, together with Gads Hill Place's architectural and historic interest, is recognised in its grade I statutory listing.



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Impact of the Proposal on Significance

The current proposal seeks retrospective permission for the permanent retention of the Hewlett Pavilion, following expiration of its latest temporary consent in 2019 (ref: 20160271).

The pavilion is a large, single-storey building of approximately 48m by 8.5m, clad in black shiplap, with a terracotta-effect Kingspan panels on the 6m high pitched roof. Located at a lower level in a relatively prominent location to the south-east of the main house, close to the former kitchen garden, the structure is clearly visible both to and from the listed mansion.

Notably, the Pavilion disrupts the house's 'noble prospect at the side and behind, looking down into the valley of the Medway,' as described by Dickens in a letter dated 9th February 1856, which is still appreciable from the reconstructed conservatory and Dickens' first floor bedroom on the south-east corner of the mansion.

Although, historically, the views were more open, due to the absence of the intervening, relatively modern woods, the detractive presence of the Hewlett building across these sightlines would result in harm to its significance.

The Applicant proposes mitigation by replacing the roof panels with a sedum-covered flat section and recladding the Pavilion in natural vertical timber boarding, intended to weather to silver-grey. Visualisations in the submitted Heritage Impact Assessment (August 2025) indicate that this strategy would reduce the building's prominence and its distracting effect in views from the house towards the Medway valley. Accordingly, the harm would be reduced but not entirely removed.

Relevant Planning Policy

The National Planning Policy Framework (NPPF, December 2024) sets out the government's policies for decision-making on planning proposals. Section 16 of the document specifies how the historic environment should be conserved and enhanced and makes it clear in paragraph 208 that conflicts between the conservation of the heritage asset and any aspect of the proposal should be avoided or minimised.

Paragraph 212 states that when considering the impact of a proposed development on a heritage asset, local planning authorities should give great weight to preserving the asset's significance, and the more important the asset, the greater the weight should be.

The NPPF states that any harm or loss to the significance of a designated heritage asset, from its alteration or destruction, or from development within its setting, should



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require clear and convincing justification (paragraph 213). It also requires decision makers to determine whether the harm is substantial, or less than substantial. If the

harm is deemed to be less than substantial, paragraph 215 requires the harm to be weighed against the public benefits of the proposal.

Relevant is also paragraph 210a, c which states that, in determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and the desirability of new development making a positive contribution to local character and distinctiveness.

Historic England Position on the Proposal

We consider that the permanent retention of the Hewlett Pavilion would cause some degree of less than substantial harm - under the NPPF - to the significance of this highly graded heritage asset, due to its impact on setting and historic views. While the proposed mitigation would reduce this harm, it would not remove it entirely.

It is for your Council to assess whether the harm has been sufficiently minimised and whether it can be outweighed by the public benefits delivered by the proposal, as required by paragraphs 208 and 215 of the Framework.

You should also be convinced that those benefits cannot be delivered by a more sympathetic long-term strategy for addressing the school's needs, while preserving the listed building's fabric and setting.

Recommendation

Historic England has concerns regarding the application on heritage grounds. In reaching a decision on this proposal, your Council will need to be satisfied that the benefits arising from the scheme are sufficient to outweigh the heritage harm.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 210a,c and 212 of the NPPF.

In determining this application, you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.



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Relevant is also section 85(1) of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of National Landscapes.

Your authority should take these representations into account and seek safeguards, as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Luciana Gallo

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