



SUPPORTING PLANNING STATEMENT

Hewlett Pavilion, Gad's Hill School, Rochester, ME3 7PA

August 2025

SUPPORTING PLANNING STATEMENT

In support of an application for the
**Retention of the Hewlett Pavilion and ancillary buildings on a permanent basis
with associated external alterations**

at
**Hewlett Pavillion
Gad’s Hill School
Gravesend Road
Higham
Rochester
ME3 7PA**

On behalf of
Mr Gray

	INITIALS	DATE COPY HAS BEEN REVIEWED
DRAFTED BY	OS	JULY 2025
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1. Introduction

- 1.1. Bloomfields Chartered Town Planners have been commissioned by Gads Hill School, to prepare and submit this retrospective planning application for the retention of, and associated alterations to, the Hewlett Pavilion at Gads Hill School, Rochester, ME3 7PA.
- 1.2. The school is in the grounds of Gad's Hill Place, the former home of Charles Dickens, which is Grade I Listed. Over the years, several temporary buildings have been erected at the school to provide additional teaching accommodation, including the Hewlett Pavilion, Laboratory, and Nursery building.
- 1.3. In 2016, a 3-year temporary permission was secured under Planning Permission Ref. 20160271 for the retention of the Hewlett Pavilion. The permission has now expired, and the client wishes to retain the building permanently. This application is a retrospective application for the retention of the Pavilion and for associated structural and aesthetic improvements including a new sedum green roof, to ensure its longevity, soften its appearance, and to allow it to continue its function to house classrooms for the children that attend the school.
- 1.4. At the school, a masterplan project for the redevelopment of a more permanent complex, replacing the temporary buildings, is currently paused, largely due to a lack of funding, design changes and alterations required for the masterplan. This means that the current proposal as set out in this Planning Statement and suite of accompanying planning documentation is the most viable option for the continued use of the Pavilion, at this time.
- 1.5. Any future redevelopment of the school site would include the crucial refurbishment of the Grade I Listed Upper School building, Gads Hill Place, the suitability of which for continued operation for educational purposes in the long-term, is under ongoing review. In the absence of solidified redevelopment plans, the temporary buildings on the site are now very important to provide necessary educational space and maintain the long-term viability of the school. The school cannot at this time relocate the classrooms from the temporary buildings, into the main building, as it is already at its operational limits.
- 1.6. This statement has been drafted to demonstrate that the proposed scheme is consistent with the objectives of the Adopted Development Plan of the Gravesham Borough Council, and the National Planning Policy Framework (NPPF) (2024).

- 1.7. Specifically, this statement identifies, and then demonstrates, that there is less than substantial harm to Gads Hill Place and its setting, caused by the Hewlett Pavilion proposed development, in both its current and proposed form, which is outweighed by the ‘public benefits’ of maintaining the Pavilion.
- 1.8. Alongside this, the evidence base set out in the Design and Access Statement (DAS) shows the structural issues that have been identified within Gad’s Hill Place, meaning that the main building cannot be used to house any classrooms, clearly showing that the Pavillion as it stands is a necessity, and furthermore, this application ensures that the proposed changes to the roof will future proof the use of Pavillion for the foreseeable, so the school can continue to operate in its current form and function.
- 1.9. This application submission is accompanied by the following supporting documents submitted as a suite of planning application documentation:

Supporting Documents -

- Design and Access Statement, Clay Architects, August 2025
- Heritage Statement, Clay Architects, August 2025
- Landscape and Visual Effects and Green Belt Assessment, EDLA Landscape Architects, August 2025
- Case for Retention of the Pavillion, Gads Hill School, August 2025 (Appendix 1 of this Planning Statement)

Submitted Plans -

5309/PL/100 Location Plan

5309/PL/101 Block Plan

5309/PL/110 Existing and Ground Floor & Roof Plan

5309/PL/111 Existing South Elevations

5309/PL/112 Existing West Elevations

5309/PL/113 Existing North Elevations

5309/PL/114 Existing East Elevations

5309/PL/115 Existing Section

5309/PL/120 Proposed Ground Floor & Roof Plan

5309/PL/121 Proposed South Elevation

5309/PL/122 Proposed West Elevations

5309/PL/123 Proposed North Elevations

5309/PL/124 Proposed East Elevations

5309/PL/125 Proposed Section

The site

- 1.10. Gad's Hill School is an independent school educating boys and girls aged 3-16, set within the grounds of Gads Hill Place, the former home of Charles Dickens. A number of buildings sit in the northern part of the site, including the 18th Century Grade I Listed Building 'Gad's Hill Place', (Listing Entry Number 1049037), and the Hewlett Pavilion, the Nursery and the Laboratory portacabins. These buildings contain classrooms and necessary facilities ancillary to the school. Gads Hill Place is also partly used as a Heritage Centre for the Dickens Trust.
- 1.11. The newly built Junior school and car park, approved under Planning Permission Ref. 20070188, run along the western border and a playing field is located to the east.
- 1.12. Gad's Hill School is located within the Borough of Gravesham, south of the settlement of Higham, and approximately 1.3 kilometres from the M2. The north of the site is bordered by the A226, and Crutches Lane runs along the western boundary of the site. The eastern and southern site boundaries are lined with mature trees. To the north of the site is the village of Higham and to the east, south and west, the site is surrounded by pockets of agricultural land.

- 1.13. Hewlett Pavilion, herein referred to as 'the site' is a single-storey building located in the north east of the school grounds. The site is a rectangular building with black timber cladding and a pitched orange tile roof and consists of 5 classrooms, offices and ancillary facilities for the Senior school, as well as important IT server equipment.

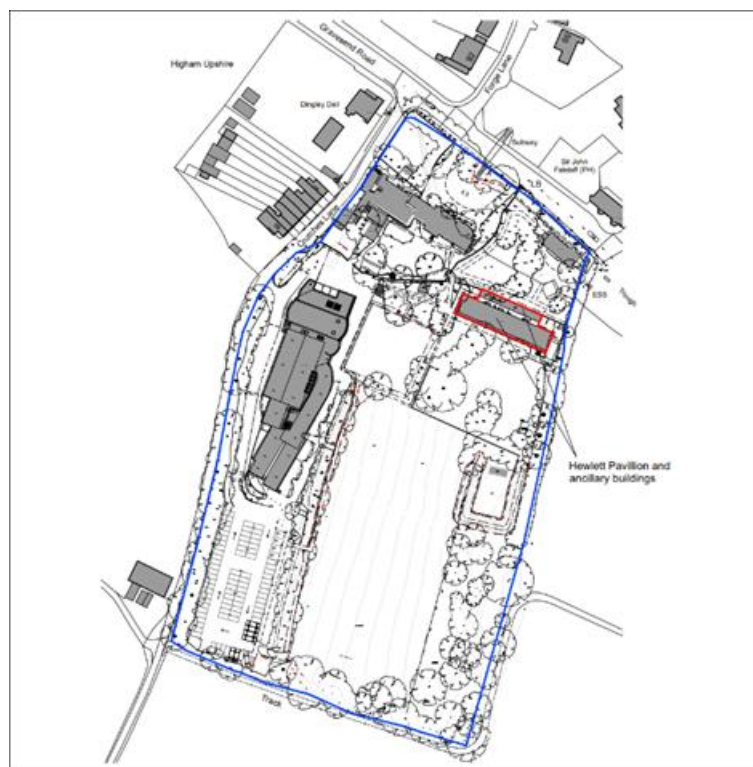


Figure 1. Site Location Plan

- 1.14. The building includes 2 science labs, a food and kitchen workshop, a design and technology workshop and an art room, teaching pupils from Key Stage 2, 3 and 4.
- 1.15. The Hewlett Pavilion is a temporary building first approved under Planning Permission Ref 20030276 in 2003. Since this first approval, an additional 4 temporary planning permissions have been approved for the site.
- 1.16. Buildings related to Gads Hill School are located to the north, south and west of the site. Agricultural land is located east of the site, with a number of residential properties sited further east. The eastern boundary of the site is lined with mature trees and vegetation.

- 1.17. In terms of constraints, the site is located within the Green Belt as well as the Shorne Woodland Designated Landscape, outside any settlement boundaries, and is in close proximity to the Grade I listed Gads Hill Place, entry no. 1049037.

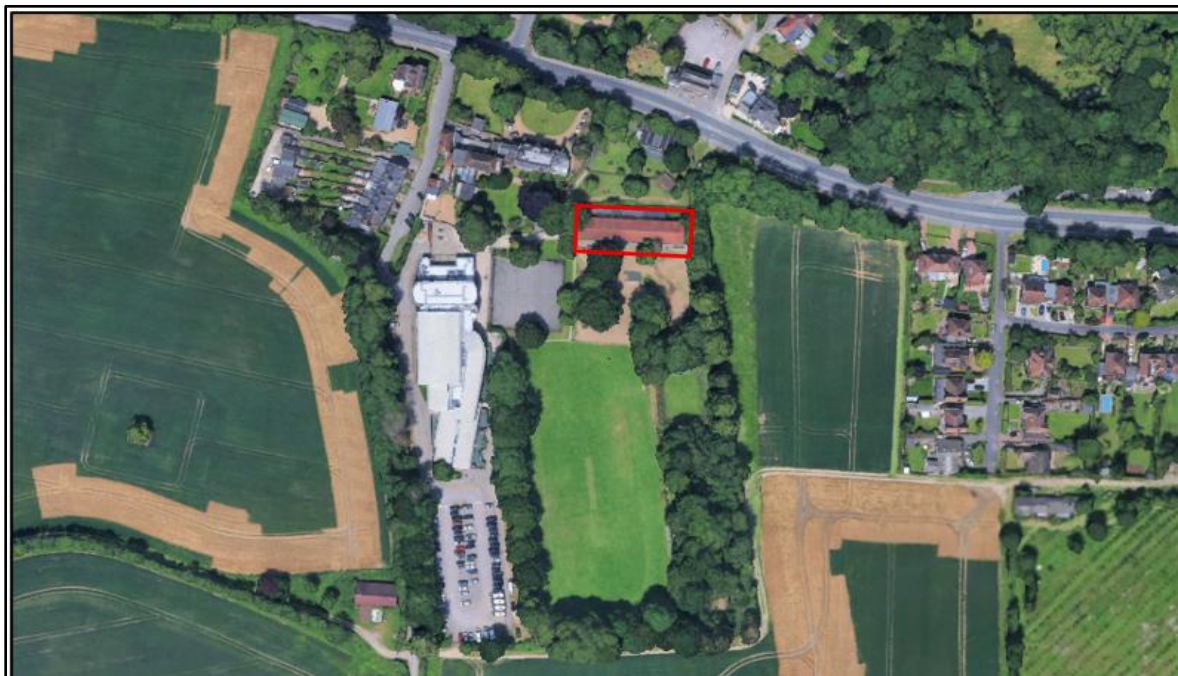


Figure 2. Google Earth aerial view of the site (pavilion shown inside red line above).

Background information

- 1.18. Over the years Gads Hill School has grown in pupil numbers, requiring the expansion of the school to accommodate this increase. During the process of this development, a number of temporary buildings were installed at the site, to provide much needed facilities whilst building commenced.

- 1.19. New facilities have also been required to ease the burden of the existing education facilities within the Grade I listed Gads Hill Place.. Due to its Listed status, its lack of space and sufficient facilities, the building cannot support modern classroom requirements in terms of electricals, heating, etc.. In addition, the fabric of the listed building is under strain from its use as a school building, whereby falling parts of the structure give rise to health and safety implications.

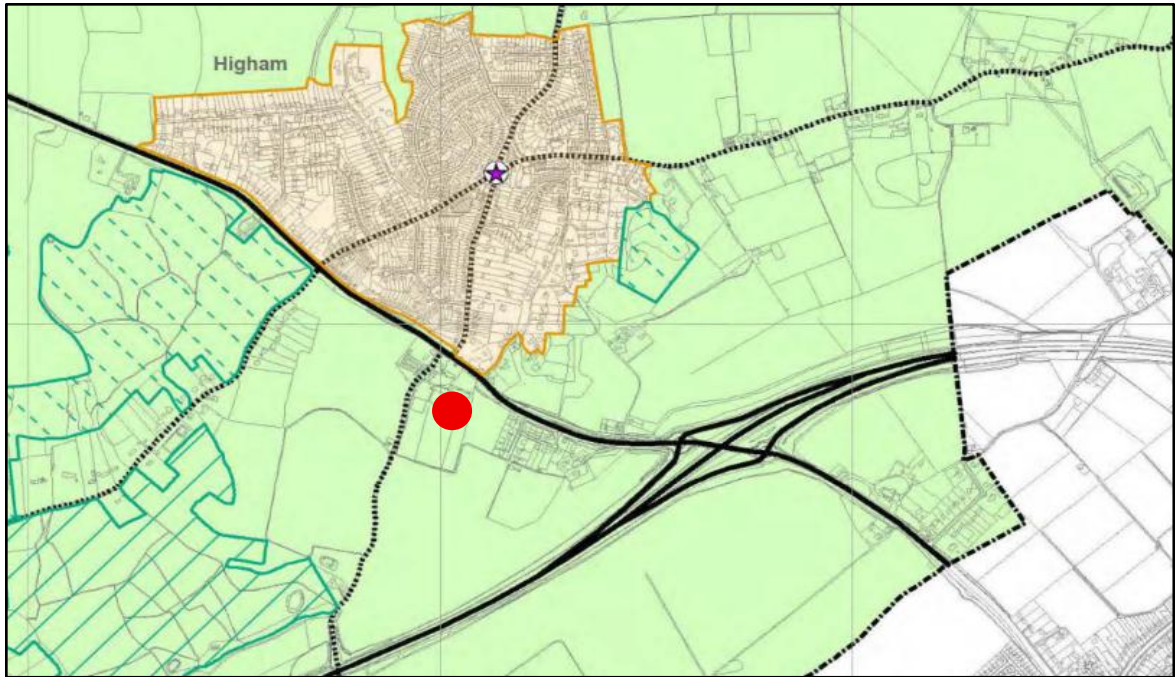


Figure 3. Extract of the Gravesham Local Plan Policies Map showing the site (red dot) in relation to the Green Belt and settlement of Higham.

- 1.20. In 2003, a 3-year temporary permission was approved for the siting of the Hewlett Pavilion to provide 5 classrooms, offices and storerooms, allowing Gads Hill Place to be taken out of educational use and providing necessary classrooms prior to development at the school.

- 1.21. In 2007, an application was approved for the development of a new Junior and Senior school at Gads Hill School. To continue to provide necessary school facilities during construction phases, temporary planning permission was submitted and approved for the siting of the Pavilion an additional 4 times. The latest temporary permission for the site has now expired and is at risk of removal.
- 1.22. In 2016, the Junior school development was completed; however due to a significant lack of funding, contextual changes, the layout and design of the previously approved Senior school is now considered not to meet the needs of the school.

2. Proposal

- 2.1. This proposal is a retrospective application for the retention of the existing Hewlett Pavilion on a permanent basis, alongside necessary alterations to improve its structural integrity and soften its visual appearance.
- 2.2. The Description of Development is for the 'Retention of the Hewlett Pavilion and ancillary buildings on a permanent basis with associated external alterations'.
- 2.3. The proposal is to refurbish, reclad and reroof the Hewlett Pavilion to renew the building and reduce its harm on the setting, historic views and significance.
- 2.4. The proposals convey that by substituting a green roof for the existing red tile effect roof of the Hewlett Pavilion, this would have the same positive effect of making the building more 'invisible' as adopting a green roof on a new building, at a fraction of the cost to the school of paying for a new building, which is not a viable financial option at this time.
- 2.5. The Landscape and Visual Impacts are addressed as part of the proposal, along with the position in regards to the Green Belt and Heritage significance.

3. Planning History

3.1. The relevant planning history has been considered below:

20030276 Erection of a single-storey building to the south of the walled kitchen garden to provide five classrooms, offices and storerooms for a temporary period. Approved (20/10/2003)

20060385 Renewal of temporary planning permission reference number GR/2003/276 for the erection of a single-storey building to the south of the walled kitchen garden to provide five classrooms, offices and storerooms for a temporary period. Approved (3/7/2006)

20090076 Retention of the single-storey building (Hewlett Pavilion) to the south of the walled kitchen garden to provide five classrooms, offices and storerooms for a temporary period. Approved (10/3/2009)

20160271 Retention of the single-storey building (Hewlett Pavilion) to the south of the walled kitchen garden to provide five classrooms, offices and storerooms for a temporary period of three years, or until the senior element of the approved building program is complete. Approved (21/7/2016)

20200385 Retention of the Hewlett Pavilion on a permanent basis. Refused (18/9/2020)

This application was refused partly on the basis that the proposal, by virtue of its size, siting, design and materials would be an overly prominent, incongruous and unsympathetic form of development which would be harmful to the Grade I listed Gads Hill Place and Shorne Woodland Designated Landscape. In the absence of any detailed special circumstances to justify development within the Green Belt, the proposal was also considered to constitute inappropriate development.

APP/K2230/W/20/3261674 Retention of the Hewlett Pavilion on a permanent basis. Appeal Dismissed (18/5/2021)

- 3.2. At appeal, it was stated that the proposal would cause the modest erosion of the architectural, historic and aesthetic value and significance of the listed building. The site was also not considered to contribute to the distinct features of the Shorne Woodland Designated Landscape Character Area as set out in the Gravesham Landscape Character Assessment and would impact the openness of the Green Belt. It was also apparent from this appeal that there would no “Very Special Circumstances” presented that would outweigh the perceived harm.

4. Design and Access Statement

- 4.1. A full and detailed Design and Access Statement accompanies the suite of Planning Application documentation, however for completeness we set out high level principles in regard to design and access of the site, below.

Use

- 4.2. The building will continue to be used for educational purposes relating to Gads Hill School.

Amount and scale

- 4.3. The building has a length of 48.58 metres, a width of 10.42 metres, an eaves height of 2.95 metres and a ridge height of 4.78 metres. There is no proposed change to the scale of the building.

Layout and appearance

- 4.4. The Pavilion consists of 5 classrooms, a toilet block, 2 offices and storage rooms. There are no proposed alterations to the building’s floorplan.
- 4.5. Although the external finishings of the building are tired, a structural report has concluded that the building is structurally sound.
- 4.6. The Pavillion has a timber truss terracotta-effect roof with a composite roofing panel fixed to it. This roof is proposed to be replaced by a sedum roof system.

- 4.7. The existing black shiplap timber cladding will be replaced with vertical board-on-board timber cladding in a natural finish. The natural finish timber boards to the side and rear will gradually oxidise and turn silver-grey, which is a more recessive and subordinate colour and tone than the existing black cladding. Vertical board-on-board timber cladding will add a finer grain of texture to the pavilion compared to the more monolithic black shiplap boards, which will help to break up the visual mass of the wall.

Landscaping

- 4.8. No additional landscaping is proposed as part of this application, however the addition of the sedum roof will create some improvement to biodiversity.

Access

- 4.9. The building is accessed via the school grounds. There are no proposed changes to this.

5. Planning Policy

- 5.1. Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission are required to be determined in accordance with the provisions of the development plan in force unless material considerations indicate otherwise.
- 5.2. The proposed development has been considered in accordance with the Gravesham Development Plan, which includes the Gravesham Local Plan First Review – Saved Policies (1994) and the Gravesham Local Plan Core Strategy (2014). This proposal also takes into account the National Planning Policy Framework (December 2024).

National Planning Policy Framework (NPPF) (December 2024)

- 5.3. **Paragraphs 7 and 8** of the NPPF outline that the purpose of the planning system is to contribute to the achievement of sustainable development through three overarching objectives:
- a) An economic objective- help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improve productivity and identifying and coordinating the provision of infrastructure;*

- b) *A social objective- to support strong and vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of the present and future generations and by fostering well designed, beautiful and safe places with accessible services and open spaces that reflect current needs and support communities health, social and cultural wellbeing; and*
- c) *An environmental objective- to protect and enhance our natural and built historic environment, including making effective use of land and improving biodiversity, using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change, including moving to a low carbon economy.*

5.4. **Paragraph 11** confirms that in respect of decision taking, the presumption in favour should be applied as follows:

- c) *Approving development proposals that accord with an up to date development plan without delay; or*
- d) *Where there are no relevant development plan policies or the policies which are most important for determining the application are out of date, granting permission unless:*
 - i) *the application of policies in this framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii) *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole having particular regards to key policies for directing development to sustainable locations making effective use of land, securing well designed places and providing affordable homes, individually or in combination.*

5.5. **Paragraph 39** provides guidance in relation to decision making and outlines that local planning authorities should approach decisions on proposed development in a positive and creative way, seeking to approve applications for sustainable development where possible.

- 5.6. **Paragraph 100** sets out that local planning authorities should take a positive approach to meeting requirements for development that will widen choices in education. Decisions should give great weight to the need to create, expand or alter schools.
- 5.7. **Paragraph 116** outlines that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.
- 5.8. **Section 12** sets out a guide to creating well-designed, high-quality and sustainable development. **Paragraph 131**, states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.
- 5.9. **Paragraph 135** outlines that decisions should ensure developments:
- a) Will function well and add to the overall quality of the area not just for the short term but over the lifetime of the development;*
 - b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c) Are sympathetic to local character and history, including surrounding built environment and landscape setting while not preventing or discouraging appropriate innovation or change; and*
 - f) Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.*
- 5.10. **Paragraph 153** states that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development should not be approved except in very special circumstances. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

- 5.11. **Paragraph 154** sets out that development within the Green Belt is inappropriate unless for the provision of appropriate facilities in connection with the existing use of land, including buildings, as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
- 5.12. **Paragraph 55** states that in regards to ‘other development’ in the Green Belt it should not be regarded as ‘inappropriate’ where a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan, b) There is a demonstrable unmet need for the type of development proposed and c) The development would be in a sustainable location.
- 5.13. **Section 14** states that plans should contribute to the mitigation and adaptation of climate change, taking into account the long-term implications of flood risk. In particular, **paragraph 170** outlines that inappropriate development in areas at risk of flooding should be avoided by directing areas away from areas at highest risk.
- 5.14. **Paragraph 187** outlines that decisions should contribute to and enhance the natural and local environment by:
- a) Protecting and enhancing valued landscapes; and
 - b) *Recognising the intrinsic character and beauty of the countryside.*
- 5.15. **Paragraph 202** sets out that heritage assets should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 5.16. **Paragraph 203** states that plans should set out a positive strategy for the conservation of the historic environment and should take into account aims to make a *positive contribution to local character and distinctiveness*.
- 5.17. **Paragraph 207** sets out that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.
- 5.18. **Paragraph 210** outlines that when 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, and*
- b) *The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality.*

- 5.19. **Paragraph 212** 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 assets conservation (and the more important the asset, the greater the weight should be).
- 5.20. **Paragraph 215** 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.
- 5.21. **Paragraph 219** sets out that developments within the setting of heritage assets should be enhanced to better 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.

Gravesham Local Plan Strategy (2014)

- 5.22. **Policy CS02** states that development outside rural settlements will be supported where it is compatible with national policies for protecting the Green Belt and policies within this plan.
- 5.23. **Policy CS10** outlines that support will be given to proposals that protect, retain or enhance existing social infrastructure. Where there is the threat of loss of existing infrastructure, consideration will be given to viability and whether sufficient alternative provision is available.
- 5.24. **Policy CS19** requires development to be visually attractive, fit for purpose and locally distinctive and should conserve the character of the local built, historic and natural environment and integrate well into the surrounding local area. Development should:
- Incorporate designs, layouts, materials and forms which are derived from an analysis of the local context and character to make a positive contribution to the street scene;

- Safeguard the amenity of neighbouring properties, including privacy, daylight and sunlight; and
 - Avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution.
- 5.25. **Policy CS11** states that new developments should mitigate their impact on the highway and public transport networks as required.
- 5.26. **Policy CS12** outlines that the overall landscape character should be restored and enhanced. Where relevant, proposals should take account of the Gravesham Character Assessment.
- 5.27. Policy CS20 sets out that the council considers high priority towards the preservation, protection and enhancement of its heritage and historic environment. Proposals will be supported where heritage assets are preserved and where appropriate enhanced.

Gravesham Local Plan First Review – Saved Policies (1994)

- 5.28. **Policy TC2** states that applications affecting the setting of a listed building should be *sympathetic in terms of massing, appearance and materials*.

Gravesham Landscape Character Assessment

- 5.29. The site is located within the Shorne Woodland Designated Landscape Character Area, located to the south east of Gravesend, as detailed in the Gravesham Landscape Character Assessment.
- 5.30. The Shorne Woodland landscape is characterised by significant areas of chestnut coppice woodland and undulating topographies with varying building styles. The sensitivity of the landscape is assessed as being moderate, whereby vantage points at the woodland edges provide views out of the area. However, the combination of the land form and tree cover provides an enclosed character with low visibility within the area.
- 5.31. Settlements are concentrated within Shorne and Shorne Ridgeway, with older building styles located towards the village centres and more recent Victorian terraces and 1960s-1970s development towards the edges. Buildings incorporate a range of traditional materials, including flint, chequered brickwork and Kent peg tiles.

6. Analysis

Principle of development

Importance of the retention and expansion of on site educational facilities

- 6.1. Paragraph 100 of the NPPF (2024) sets out that local planning authorities should take a positive approach to meeting requirements for development that will widen choices in education, giving great weight to the need to create, expand or alter schools (our emphasis).
- 6.2. Policy CS10 of the Local Plan (2014) outlines that support will be given to proposals that protect, retain or enhance existing social infrastructure. Where there is the threat of loss of existing infrastructure, consideration will be given to viability and whether sufficient alternative provision is available.
- 6.3. Under Planning Permission Ref. 20160271, approved in 2016, a 3-year temporary permission for the retention of the Hewlett Pavilion was granted. This permission has now expired and as stated in Condition 2 of the permission, the building should now be removed. This would result in the loss of much needed classrooms on site.
- 6.4. Gads Hill School has previously undergone redevelopment to facilitate the growing pupil numbers and provide alternative classroom facilities. The school has previously finalised the completion of the Junior School, however due to a lack of funding and scheme evolution, requiring layout and design alterations, the Senior School development has been delayed to the point where the previously approved scheme can no longer be constructed.
- 6.5. In addition to this growth, the Grade I listed Gads Hill Place requires crucial maintenance and the suitability of the building for the continued operation for educational purposes in the long-term, is under ongoing review. In the absence of solidified redevelopment plans, the temporary buildings on the site are now very important to provide necessary educational space and maintain the long-term viability of the school. The school cannot at this time relocate the classrooms from the temporary buildings, into the main building, as it is already at its operational limits. The school cannot accommodate further classroom pressure, were the pavilion to be lost.

- 6.6. As detailed in appeal decision ref. APP/K2230/W/20/3261674, Gads Hill Place lacks space and sufficient facilities with the fabric of the building under strain from use as a school building.
- 6.7. The temporary building has provided essential educational space during the construction period and continues to, in light of the Senior school development delay. With the threat of removal of the Hewlett Pavilion and the delay in the development of permanent buildings on the site, Gads School is at risk of losing its facilities.
- 6.8. This application is accompanied by a detailed and thorough 'Case for the retention of the Pavillion' provided by Gads Hill School, outlining the detrimental impacts that could occur as a result of losing the Pavilion. Attached at Appendix 1.
- 6.9. The Pavilion accommodates science, food and nutrition, design and technology and art lessons for pupils from Key Stages 2,3 and 4. 66% of all pupils use the Pavilion at least once a week, and depending on GCSE options, a Year 11 pupil could have up to 19 lessons a week in the building.
- 6.10. All other buildings on the site are fully timetabled and therefore cannot accommodate these subjects if required as a result of the loss of the Pavilion. The loss of the building would therefore result in the school's failure to meet standards requiring a broad and balanced provision of subjects and reduces their ability to teach the required elements of GCSE curriculum.
- 6.11. Additionally, from an operational perspective, the loss of facilities is not viable as it may result in the need to reduce pupil numbers to accommodate the loss of school buildings. As a privately run institution, the school heavily relies on educational fees from its pupils, however a reduction in classrooms could ultimately result in a reduction in pupil numbers, as the school would struggle to cater for the number of pupils on roll, and this could mean a loss of the necessary funding required to keep the school running.
- 6.12. In conflict with Paragraph 100 of the NPPF, the loss of school buildings could result in the reduction of educational opportunities at the school and in an extreme case could cause the decrease of independent education facilities within the area.

- 6.13. Acknowledged under appeal decision ref. APP/K2230/W/20/3261674, it is clear that a longer-term plan and vision for the school's ongoing requirements for classroom capacity needs to be considered, noting the sensitivity of the site and the need to safeguard the long-term conservation of the fabric of the listed building.
- 6.14. In accordance with paragraph 100 of the NPPF and Local Plan Policy CS10, the retention of the Hewlett Pavilion would ensure that the borough's social infrastructure in this location is protected and retained, allowing the borough to continue to provide a wide range of educational facilities, including the independently run Gads Hill School.

Heritage

- 6.15. The site is in close proximity to the Grade I listed Gads Hill Place, entry no. 1049037, which has been carefully considered as part of this application.
- 6.16. The description of Gads Hill Place is set out as follows:

Built in 1779 by Thomas Stevens former Mayor of Rochester. Owned and occupied by Charles Dickens from 1857 until his death 1870. He wrote a number of his novels here. The opening scenes of "Great Expectations" are set in the locality.

Walls of red brick with string course below parapet. Slated Mansard roof with central octagonal bell turret with ogee-shaped lead roof, ball finial and weathervane. Sash windows without glazing bars. Projecting porch with columns and pilasters and round-headed entrance door with fanlight. On either side 2-storey 3-sided bays with cornices to each storey. Central first floor window with 3 lights and elliptical arch to centre light. To the south-east the dining room was extended and a large conservatory added by Dickens. Rear much altered and built out, but an original doorcase with pilasters, pediment, and semi-circular fanlight, stone steps and wrought iron handrail. Internally Dickens' study is preserved as he left it with comical invented book titles in a sham bookcase on the door and original bookcases lining the walls. The staircase has had alternate balusters removed and fretwork panels inserted. Hans Anderson stayed at the house in 1857. Dickens built a tunnel beneath the main road to give access to an extra garden where he erected a Swiss chalet now in Rochester museum.

- 6.17. The site is also in proximity to the Curtilage Listed Wall, which surrounds the historic property Gads Hill Place. This wall is considered part of the property's protected curtilage and therefore requires the same level of protection.
- 6.18. This application is accompanied by a Heritage Statement (Clay Architecture, August, 2025), assessing the historical significance of Gads Hill Place and the impacts of the proposed development.
- 6.19. In its current state, the Pavilion is considered to cause a degree of less than substantial harm. The Pavilion lies across the direct line of the long view to the Medway valley, Dickens described in a letter written by Charles Dickens. It is considered that the building, in its current form, by virtue of its size and proximity to the house, impacts the garden setting of the house and draws the eye away and detracts from the views of the Medway valley due to its dominant red roofing and black cladding.
- 6.20. The school proposes to refurbish and renew the Hewlett Pavilion to prolong its useful life and soften its appearance. The structure of the pavilion is sound, but the finishes are tired and need attention. The terracotta-effect Kingspan insulated roof panels are close to the end of their useful thermal and structural life and are not in good condition.
- 6.21. The new sedum roof will allow the building to blend in with the surrounding vegetation, making the roof much more regressive and subordinate than the existing tile-effect red roof.
- 6.22. The Heritage statement concludes that these alterations to the Pavilion, including the proposed mitigation measure of changing the roof and cladding finishes to sedum and natural timber, will more than halve the harm of the building, which whilst still potentially falling within the bracket of less than substantial harm to the significance of Gads Hill Place and its setting, is considered to be outweighed by the public benefits demonstrated elsewhere within this Planning Statement.

Conservation

- 6.23. Paragraph 212 of the 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.

- 6.24. Policy CS20 of the 2014 Local Plan sets out that the council considers high priority towards the preservation, protection and enhancement of its heritage and historic environment.
- 6.25. Conservation benefits arise from the permanent retention of the Pavilion. By keeping this building in situ, and using it for classes for the pupils of the school, the strain on Gads Hill Place can be reduced.
- 6.26. The results of the structural investigation undertaken this year are included in the DAS that accompanies this Planning Statement. A traffic light survey is included as part of the summary information from the investigation, in the DAS Appendix, which clearly identifies areas of the main building that are 'adequate' for use (Green), areas that are not adequate but can be improved (Amber) and areas that are subject to load testing and are not adequate (Red). This identifies a number of classrooms and the staircase as not adequate to withstand the recommended loading for classrooms and a series of recommendations are set out at para 6.29 below and within the DAS itself.
- 6.27. Based on their findings in the condition survey, ABP Engineers advised that there are likely to be significant implications to the integrity of the existing building were it to be continued for use as a school building beyond 5 years from the date of the survey.
- 6.28. Within the Condition Survey, it was recommended that urgent work is = required to strengthen the floors, landing and central staircase. The building's roof is also in poor condition, suffering from water ingress, which has weakened the lath and plaster ceilings on the second floor.
- 6.29. The structural investigation was completed this summer as part of a Listed Building Application (20250370).
- 6.30. As a result of the survey, it has been recommended:
- That the central stair be closed off and stop being used by the school
 - That the existing 1930s stair be extended to the second floor as the new primary means of escape
 - That the floors to the 2 rooms and 2 landings which can be improved, are improved
 - That the 4 rooms that are inadequate are downgraded to be only used by small groups

- 6.31. This severely limits the school's options for relocating classrooms in the Hewlett Pavilion.
- 6.32. Therefore this proposal for the retention of the Pavilion will assist in the creation of long-term heritage benefits for Gad's Hill Place and its longevity, by retaining much needed additional buildings within the site (such as the Hewlett Pavilion) that can continue to absorb the overflow of pupils needing additional classrooms, as the school cannot at this time relocate the classrooms from the temporary buildings into the main building, as it is already at its operational limits.
- 6.33. The school cannot accommodate further classroom pressure, were the pavilion to be lost, but by retaining the Pavilion the school can continue to operate as it does now and the historic Gads Hill Place will not be faced with additional strain, therefore helping its historic preservation. It is considered that if the temporary buildings were to be removed, resulting in a reduction in school capacity, pupil numbers and student tuition fees, less money will be available for the conservation and repair of the listed building. As detailed, the school has already suffered from a lack of funding for the development of the Senior school. A reduction in pupils will further exacerbate these funding issues, and as such, the school may not be able to afford necessary maintenance, limiting conservation efforts whereby Gads Hill Place may fall into further disrepair.
- 6.34. A detailed Options appraisal is set out in the DAS which provides an overview of 4 options for the Hewlett Pavilion. All the detail on the Options are set out in the DAS, however in summary it has been evidenced that Option 4 to retain the pavilion, replace the roof and cladding to reduce its visual impact and harm on significance is the option most appropriate and is the one being submitted for planning approval.
- 6.35. Option 4 is technically feasible, Option 4 will cost significantly less than Option 2 or Option 3 and arguably, after refurbishment, Option 4 will have an impact on significance no worse than Option 2 or Option 3.

Public benefits

- 6.36. Paragraph 215 of the NPPF 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.

- 6.37. It is considered that the proposal will deliver a substantial range of significant public benefits. Gads Hill Place is falling into disrepair, whereby health and safety concerns have arisen. Additionally, the building lacks sufficient space and facilities to host modern classrooms, including inadequate electricity circuits. In the absence of the Senior school redevelopment, the permanent retention of the Hewlett Pavilion will continue to provide much needed alternative classrooms which are safe and provide a high-quality learning environment.
- 6.38. In an extreme case, the loss of the temporary buildings could result in reductions in pupil numbers and financial loss, resulting in the closure of the school. This would be detrimental to the students as they would have to seek education elsewhere, potentially away from their friends and peers. Additionally, it is considered that moving schools would cause huge disruption and may be detrimental to their education and progress.
- 6.39. Specifically, the school currently supports a number of pupils with Education, Health and Care Plans, whereby Local Authorities have identified that Gad's Hill is the appropriate setting to meet their significant learning and emotional needs. Gad's Hill reduces strain on state provision and provides tailored, often hard-to-find placements for high-needs children. The closure of the school, may result in children being put into schools which are not equipped to facilitate the needs of these children, potentially causing stress and educational disruption.
- 6.40. The loss of the school would also result in the loss of over 100 staff, including teachers, administrators and site staff.
- 6.41. For the purposes of applying national policy, the Hewlett Pavilion, when taking into account the proposed external alterations, are considered to fall within the bracket of less than substantial harm to Gads Hill Place and its setting, however the proposed changes to the Pavilion will, in fact, improve the pavilions impact on the 'setting' through the roof and elevation changes, and so this 'less than substantial harm' is considered to be outweighed by the public benefits of the scheme.

The public benefits that arise from the retention of the Pavilion, and which are explained throughout this Planning Statement, should be attributed substantial weight, outweighing the less than substantial harm.

Setting

- 6.42. Paragraph 219 of the NPPF sets out that developments within the setting of heritage assets should be enhanced with elements of their setting preserved.
- 6.43. Policy TC2 of the 1994 Saved Policies Local Plan specifically states that applications affecting the setting of a listed building should be sympathetic in terms of massing, appearance and materials.
- 6.44. The scheme proposes to renew and refurbish the pavilion using materials which reduce / mitigate the impact of the pavilion on the setting and historic views of the house.
- 6.45. After oxidation, the proposed new timber boards will turn silver-grey, which is considered a more regressive and subordinate colour and tone than the existing black cladding. Additionally, the vertical board-on-board timber cladding adds a finer grain of texture to the pavilion, which will help to break up the visual mass of the wall, improving any impacts on the setting of the heritage asset.

Green Belt

Very special circumstances

- 6.46. Paragraph 153 of the NPPF states that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 6.47. As detailed above, the redevelopment of Gads Hill Senior School has been paused and the temporary Hewlett Pavilion, providing 5 classrooms and ancillary facilities, is at risk of removal due to the expiry of a temporary planning permission. As a result, the school faces the potential loss of necessary classrooms.

- 6.48. With the redevelopment unable to proceed, the permanent retention of the Pavilion is crucial, so that the school can provide the necessary facilities needed to maintain the functioning of the school. A loss of school buildings may reduce the school's remaining capacity and could see the school having to downsize in pupil numbers in order to manage the school's capacity.
- 6.49. From a business perspective, the loss of facilities and therefore pupils, is not viable. Gads Hills School is an independent school and relies on student fees to function. A loss in funding may therefore impact the ways in which the school is able to run.
- 6.50. It is considered that, in this circumstance whereby the loss of temporary buildings may, as a consequence, lead to a reduction of school funding and in extreme circumstances result in the closure of the school, it is essential that the temporary building be retained permanently.

Inappropriate development and openness of the Green Belt

- 6.51. Paragraph 154 (g) of the NPPF sets out that development within the Green Belt is inappropriate unless for the limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.
- 6.52. It is our opinion that the development is 'not inappropriate' as it complies with Paragraph 154 (g) as it meets the definition as 'limited infilling', which would not cause substantial harm to the openness of the Green Belt.
- 6.53. Notwithstanding this, were the Council to come to a different conclusion, we feel that the development should be considered acceptable under NPPF paragraph 155 by virtue of it utilising Grey Belt land ('grey belt' is defined as land in the Green Belt comprising previously developed land that does not strongly contribute to checking unrestricted sprawl, preventing towns merging, nor affecting the setting and special character of historic towns, as set out in NPPF paragraph 143), fundamentally as there is a demonstrable need for the continued educational provision (as evidenced) and as it is in a sustainable location.

- 6.54. A Landscape and Visual Impact Appraisal and Green Belt Assessment (LVA) has been prepared by EDLA Landscape Architects (August 2025) which sets out that whilst the site is included within parcel 10 of Gravesham's Regulation 18 Consultation Green Belt Study, EDLA identify that the site is an existing developed part of Parcel 10 and is not visible from the wider rural landscape across Parcel 10, due to the density of the boundary vegetation at the school. Therefore, the published conclusions are more pertinent to the rural landscape within Parcel 10, rather than the site itself.
- 6.55. EDLA's assessment of the site, based upon Gravesham's Green Belt methodology, concludes that the site does not contribute to the NPPF Green Belt purposes and is Grey Belt, due to its very small geographic scale and existing developed character.
- 6.56. The Proposed Development aims to refurbish the existing buildings on the site, therefore the site would remain a developed area. The spatial and visual openness of the roofscape would be improved, via the change from a tiled roof to a sedum green roof and less built form than the tiles.
- 6.57. The green roof would also enhance the landscape character and opportunities for biodiversity. The visual openness of the Site would be improved by the natural timber façade and the change from the tiled roof to the green roof.
- 6.58. Therefore, there any harm to the spatial and visual aspects of openness and the purposes of the Green Belt from the Proposed Development would be less than that of the 'limited' harm caused by the existing buildings.
- 6.59. In relation to the NPPF Green Belt purposes and NPPF Paragraph 154, the Proposed Development would meet criteria g), via the redevelopment of previously developed land, as it would not cause substantial harm to the openness of the Green Belt due to the beneficial changes to spatial and visual openness.
- 6.60. Notwithstanding the above, given the Site is assessed as Grey Belt, the Proposed Development would not be inappropriate in any event.
- 6.61. It is considered that the retention of the Hewlett Pavilion would not cause substantial harm to the openness of the Green Belt. The Pavilion has been in situ for over 20 years and is established in its surrounds and so its retention will not cause further impacts upon the openness of the Green Belt.

- 6.62. The LVA sets out that high quality architectural changes to the Hewlett Pavillion would increase the architectural and scenic value of the building, with the green roof providing increased opportunities for biodiversity. The resulting neutral effects to the published landscape character areas, moderate beneficial effects at the Site scale and minor to moderate beneficial visual effects demonstrate that the effects would not be significant adverse, but would be beneficial, including in views from Gad's Hill Place.
- 6.63. The Proposed Development is able to be successfully accommodated within the existing landscape and visual context and provides the opportunities for a range of beneficial landscape and visual effects, including to the openness of the Green Belt.
- 6.64. Any impact upon the Green Belt is minimal as a result. The site has a low, single-storey profile and is viewed within the context of other established buildings which collectively limit any potential visual intrusion or sprawl. Additionally, the site is well screened by mature trees and vegetation on its northern boundary, reducing views into the site from Gravesend Road. The eastern boundary of the site is also lined by vegetation, creating a natural enclosure that significantly reduces visibility from surrounding areas and preserves the rural character of the landscape.
- 6.65. The addition of the new sedum green roof and natural timber cladding will help the Pavilion 'disappear' into the landscape and surrounds.



Figure 4. Google Maps Street View image of the site from Gravesend Road

Landscape and Visual Impact

- 6.66. Paragraph 187 of the NPPF outlines that decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.
- 6.67. Policy CS19 of the 2014 Local Plan requires development to be visually attractive, fit for purpose and locally distinctive and should conserve the character of the local built and natural environment and integrate well into the surrounding local area. Policy CS12 in particular requires development to take account of the Gravesham Landscape Character Assessment.
- 6.68. The site is located within the Shorne Woodland Designated Landscape Character Area (LCA4) and therefore new development needs to be well situated and sympathetic to the Character Area.
- 6.69. As detailed within the Gravesham Landscape Character Assessment, the Shorne Woodland area is characterised by varying building styles whereby the combination of the land form and tree cover provides an enclosed character with low visibility within the area.

- 6.70. This limited infill development comprising a single-storey Pavilion building, situated among existing structures would have minimal impact on the Landscape Character Area. Given the surrounding built environment, the development would be largely screened from view and would blend into the existing urban fabric. Its modest height and scale ensure it remains subordinate to the surrounding buildings and does not impact the area's overall sense of enclosure. As such, the Pavilion does not significantly alter the visual character or impact the established sense of place.
- 6.71. A Landscape and Visual Impact Appraisal and Green Belt Assessment has been prepared by EDLA Landscape Architects (August 2025), which sets out a comprehensive overview of the landscape and visual effects of the proposal.
- 6.72. In summary, in regards to Landscape effects, the Proposed Development would result in a beneficial change to the architectural quality and scenic quality of the Hewlett Pavilion. This is because the natural timber boards will provide a more recessive tone which is more sympathetic to the vegetated setting of the building, and the varying oxidation of the timber will provide a visual interest.
- 6.73. The monotonous style and notable red tone of the existing roof would be replaced with the soft form of the green roof, with a range of colour tones to reflect the surrounding vegetation. The green roof would respond positively to the Gravesham Design Code, which notes that green roofs promote biodiversity and improve the resilience to climate change.
- 6.74. The Proposed Development would also respond positively to all of the published landscape character assessment's, due to increasing planting within the Site and the opportunities to increase habitat linkages.
- 6.75. The landscape effects are therefore predicted to range between neutral and moderate beneficial.
- 6.76. In summary, in regard to visual effects, from within the school grounds, the change to the façade and roof would result in minor beneficial effects. This is due to providing a more recessive façade and in combination with the green roof, tonal colours which visually link with the surrounding vegetated character of the Site.

- 6.77. From Gad's Hill Place, the change to the composition of the view, from a very notable red roof, to the green tones of the green roof and new visual links between the Site and the wider countryside would result in minor beneficial effects in winter and moderate beneficial effects in summer.
- 6.78. Overall, the LVA concludes that the impact of the existing building is improved by the proposed alterations because the high quality architectural changes to the Hewlett Pavillion would increase the architectural and scenic value of the building, with the green roof providing increased opportunities for biodiversity. The resulting neutral effects to the published landscape character areas, moderate beneficial effects at the Site scale and minor to moderate beneficial visual effects demonstrate that the effects would not be significant adverse, but would be beneficial, including in views from Gad's Hill Place.

Design, character and appearance

- 6.79. Paragraph 135 of the NPPF outlines that decisions should ensure developments will function well and add to the overall quality of the area through good architecture, layouts and appropriate and effective landscaping.
- 6.80. Policy CS19 of the 2014 Local Plan requires development to be visually attractive, fit for purpose and locally distinctive, incorporating designs, layouts, materials and forms which are derived from an analysis of the local context and character to make a positive contribution to the street scene.
- 6.81. The proposals set out within the suite of planning application documentation (including the DAS and accompanying drawings) suggest physical alterations in the form of a new sedum green roof and natural finish timber external walls, that could help to make the building appear less prominent and more appropriate and sympathetic within the setting of Gad's Hill Place.
- 6.82. The building's current red roof will be replaced with a sedum roof, minimising its impact on views out of Gads Hill Place and the setting of the listed building, Green Belt and Shornewood Character Area.



Figure 5. Existing (left) and proposed (right) views of the Hewlett Pavilion once the sedum roof has been added to the Pavillion.

- 6.83. The building's current cladding is tired and in need of replacement. The black shiplap timber cladding can be viewed to be quite dominant and can be seen to 'cause some harm' to the significance of the historic house. The existing cladding will be replaced with vertical board-on-board timber cladding in a natural finish. The natural finish timber boards will gradually oxidize and turn silver-grey, however, they will still remain a more recessive and subordinate colour and tone than the existing black cladding.

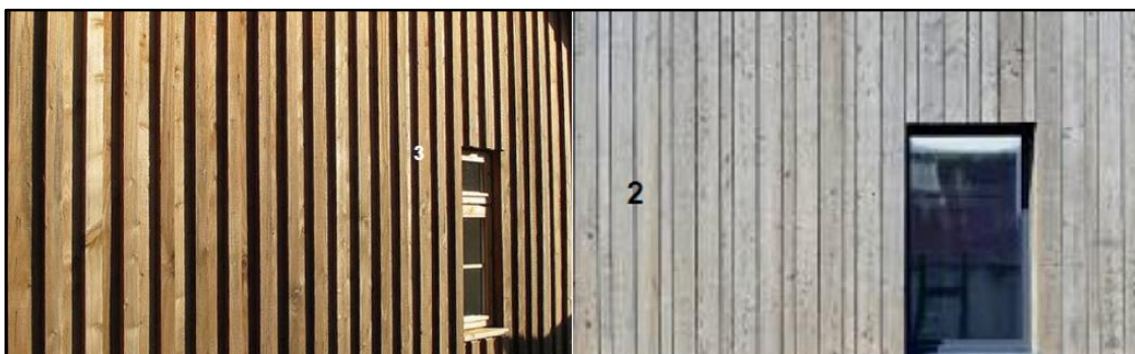


Figure 6. Proposed cladding before (left) and after (right) oxidation.

- 6.84. Overall, it is considered that these alterations ensure that the Pavilion will be less visually obtrusive in relation to Gads Hill Place.

Amenity

- 6.85. Paragraph 135 of the NPPF states that developments should provide a high standard of amenity for existing and future users.
- 6.86. Policy CS19 of the Local Plan requires development to safeguard the amenity of neighbouring properties, including privacy, daylight and sunlight pollution, including noise, air, odour and light pollution.
- 6.87. The site is adjoined by open land on its north, east and south boundaries and related to Gads Hill School on the west. The retention of a single-storey school building within a school site that is not in proximity to any neighbouring residential properties will not result in any detrimental impact on neighbouring amenity in terms of privacy, daylight, or noise.
- 6.88. Given the absence of adjoining residential dwellings, there is no residential amenity that could be adversely affected by the presence or continued use of the building. There will therefore be no concerns regarding privacy, as there are no nearby homes that could be overlooked. In terms of noise, the typical daytime activities associated with school use are confined within the boundaries of the school grounds and are unlikely to cause any nuisance in the absence of residential neighbours. The proposal will therefore have no impact on neighbouring residential amenity.
- 6.89. The building's single-storey height ensures that it does not obstruct sunlight or natural daylight to adjacent school buildings, preserving open sky views and light access across the site. As such, the retention of the building poses no harm to the amenity of the surrounding buildings.

The proposal therefore complies with paragraph 135 of the NPPF and Policy CS19 of the Local Plan to generate and maintain a high level of amenity for existing and future users.

Transport and Access

- 6.90. Paragraph 116 of the NPPF outlines that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

- 6.91. Policy CS11 of the 2014 Local Plan states that new developments should mitigate their impact on the highway and public transport networks as required.
- 6.92. The retention of the existing school building within the established school site will not result in an increase in traffic movements or have any adverse impact on road safety. As the building is already part of the school's operational infrastructure, its continued use does not introduce any new pupils, staff, or visitors that would generate additional vehicle trips to and from the site.
- 6.93. The existing access arrangements, parking provisions, and traffic management measures remain adequate to accommodate current levels of activity. Furthermore, since there is no change in the scale or function of the school as a result of retaining the building, the volume and pattern of traffic in the surrounding area will remain unchanged, ensuring there is no detrimental effect on local road conditions or pedestrian safety.

7. Conclusion

- 7.1. This retrospective planning application is for the retention of the Hewlett Pavilion at Gads Hill School on a permanent basis.
- 7.2. Very Special circumstances have been demonstrated as part of this application to justify the need for development within the Green Belt, supported by a business case report. With delays in the Senior school development, Gads Hill Place being not fit for purpose as an educational building, and the threat of the removal of temporary classroom facilities the school, the school risks losing pupil numbers and tuition fees impacting the schools ability to function viably and in extreme cases resulting in closure. It is for this reason that the permanent retention of the Pavilion is crucial to provide necessary classrooms.
- 7.3. This statement has demonstrated that material external alterations to the Pavilion will ensure that it becomes more sympathetic to the historical significance of the Grade II listed Gads Hill place and its setting.
- 7.4. Overall, the development will cause a less than substantial harm to the setting of the Listed building.

- 7.5. It is asserted that the public benefit of maintaining classroom facilities and keeping the school open outweighs the less than substantial harm to the setting of the listed building. Additionally, the Pavilion is a single-storey building, located among existing buildings and is screened by mature trees and vegetation, and so its continued existence would have a negligible impact on the openness of the Green Belt or the Shorne Woodland Character Area. Furthermore, as set out in other instances throughout this Supporting Statement, it should be noted that the development should not, as per the provisions set out in NPPF Paragraph 154, be considered ‘inappropriate in the Green Belt’, by definition.
- 7.6. The benefits of the retention of this Pavilion building are numerous and far reaching. The detail on this is set out in the supporting documentation and the Appendix 1 Case for Retention of the Pavilion included in this Planning Supporting Statement. A high level bullet point summary from this Appendix is set out below for your consideration –
- 7.7. The Pavilion is essential to the ongoing functionality of the school for the following reasons:
- The school’s ability to deliver a compliant, balanced, and enriching education;
 - Importance of supporting children’s mental health and enrichment in the provision of arts-based learning and development
 - The school’s capacity to retain pupils and meet parental expectations;
 - The school’s operational continuity;
 - The protection and future opening of Gad’s Hill Place, a building of national significance;
 - Advancing the school’s sustainability goals through low-impact refurbishment;
 - The school’s strategic aim to replace temporary structures with permanent facilities;
 - The educational, economic, and cultural health of the wider community.
- 7.8. This Supporting Statement has demonstrated that the proposal accords with the relevant national and local planning policies and therefore it is requested that this proposal is considered favourably.

8. Appendix 1 – Case for Retention of the Pavilion

Case for the Retention of the Pavilion Building

Executive Summary

The Pavilion is a critical asset to Gad's Hill School, an independent school for boys and girls aged 3 to 16, which has existed in Higham in Gravesham for more than a century since its foundation in 1924. The school celebrated this milestone in a joint celebration with Gravesham Borough Council on our site last summer.

While originally granted under temporary planning consent, it now houses:

- Five specialist teaching spaces: two science laboratories, a food and nutrition kitchen, a design technology (DT) workshop, and an art room.
- The Network Manager's Office, which manages the entire IT infrastructure and digital safeguarding provision for the school.

These facilities are essential for curriculum delivery, from Junior School through to GCSE-level qualifications, and cannot be relocated elsewhere on site. Their removal would represent an existential threat to the school, potentially resulting in curriculum failure, regulatory non-compliance, school contraction or closure, and serious consequences for the 358 pupils that are enrolled at the school, over 100 staff, and the broader Gravesham community.

Furthermore, the Pavilion plays a key enabling role in the school's longer-term ambitions, including the restoration of Gad's Hill Place - the historic former home of Charles Dickens - and the development of permanent new learning facilities intended to increase public access and cultural engagement. The Pavilion and the teaching spaces which occupy it are in a good condition.

The proposed refurbishment of the Pavilion (featuring a sedum green roof and natural timber cladding) will significantly reduce its visual impact on the historic setting, while delivering measurable environmental benefits. This approach ensures that limited resources are directed toward urgent conservation work on Gad's Hill Place, which, in pre-consultation with Historic England on an alternative phased masterplan, was agreed should take priority over the impact of the pavilion.

We respectfully request the renewal or permanent extension of planning consent for the Pavilion, recognising its critical role in the school's educational delivery, operational viability, and long-term service to the community.

1. Educational Necessity: Curriculum Delivery

The Pavilion provides essential teaching spaces for subjects that are:

- Taught within it from Key Stage 2 (Junior School) onwards
- Mandatory or core options at Key Stage 3
- Delivered through to GCSE level at Key Stage 4
- Practical in nature, and therefore require specialist equipment and facilities

The Pavilion includes:

- Two fully equipped science laboratories - necessary for practical experiments required by GCSE science specifications.
- One food and nutrition kitchen workshop - for practical cookery and nutritional science, a popular subject for many pupils at GCSE.
- One design technology (DT) workshop - supporting resistant materials, electronics, and design thinking, all key to 21st-century skills development.
- One art room - facilitating fine art, 3D work, and creative expression.

These subjects are not only statutory in the national curriculum and a key part of independent school provision but also vital for pupil engagement, creativity, and progression to post-16 and university-level study.

236 (66%) of our 358 pupils use classrooms in the pavilion on *at least* a weekly basis. A child in Year 7 will currently have 8 lessons per week in the pavilion (5 hours 20 minutes), while, depending on GCSE options, a child in Year 11 could have up to 19 lessons per week in that building (12 hours 40 minutes). Classrooms in the pavilion are also used for morning form time sessions (1 hour 30 minutes) for four different form classes.

Gad's Hill School provides a vital benefit within the local education sector, offering parents in Gravesham and the surrounding boroughs additional choice, and meaning that our 358 pupils are not being educated at taxpayer expense in the maintained sector. We are proud of our inclusive ethos. Over half of our pupils (54%) come from minority ethnic backgrounds, and the vast majority are the first in their families to receive an independent education. Many of our pupils would struggle in larger settings: we currently support six pupils with Education, Health and Care Plans – where Kent and other Local Authorities have identified that Gad's Hill is the appropriate setting to meet their significant learning and emotional needs - and 141 pupils with identified educational needs. By meeting the specialist educational needs of pupils placed by local authorities, Gad's Hill reduces strain on state provision and provides tailored,

often hard-to-find placements for high-needs children. In an area where the grammar school system can limit parental choice, we offer an important alternative - providing high-quality, nurturing education to a diverse and vibrant community.

2. No Available or Suitable Alternative Spaces

All other buildings on site are fully timetabled and cannot accommodate these subjects:

- Main building, Maths block, Stable block - Fully occupied throughout the week, no spare capacity.
- Gad's Hill Place - Currently undergoing intrusive structural surveys. Its ongoing suitability for pupil use is uncertain and potentially limited due to its heritage listing and the condition of its floors and staircase, which were not built specifically for the loading requirements of a school building.
- No general classroom can be safely or legally converted for use as a science lab, DT room, or food kitchen without extensive and disruptive refurbishment that is not financially or logistically viable.

There are no off-site options or temporary structures that would meet the educational, safeguarding, or safety requirements necessary for teaching these subjects.

3. Curriculum, Inspection, and Regulatory Compliance

Independent schools must comply with the *Education (Independent School Standards) Regulations 2014*, particularly:

- Part 1 (Quality of education) - Requiring full subject provision and specialist facilities where necessary.
- Part 5 (Premises and accommodation) - Mandating suitable classrooms, equipment, and health and safety standards.
- ISI/Ofsted frameworks - Expectation of safe, effective, and enriching delivery of both academic and practical subjects.

Without the Pavilion, the school would:

- Be unable to teach required elements of the GCSE curriculum;
- Fail to meet the standards for broad and balanced provision;

- Risk regulatory sanction, including action plans, loss of accreditation, or even deregistration.

4. Digital Infrastructure and Operational Continuity

The Pavilion houses the school's Network Manager's Office, which oversees:

- IT systems used for teaching, assessment, safeguarding, administration, and communication;
- The school's server infrastructure, switches, and backup systems;
- Real-time technical support across the entire school site;
- Digital safeguarding tools, MIS platforms, and data protection systems.

Relocating the network infrastructure would present:

- Security and GDPR compliance risks;
- Service interruptions affecting teaching, parental communication, and assessment;
- Loss of real-time IT support, especially critical during exam periods and digital learning activities.

This office must remain in a secure, network-ready, temperature-controlled space—conditions not available elsewhere on site.

5. Risk to School Viability

The Pavilion is not a convenience – it is a foundation of the school's viability.

Without it:

- Key GCSE subjects would be suspended or severely degraded;
- Parental confidence would collapse, resulting in withdrawals and decline in enrolment;
- Staff would be impacted by changes to role, scope, or redundancy;
- The school would face operational and financial instability that could lead to permanent closure.

This is not a hypothetical risk: without the Pavilion, the school cannot function as a compliant or competitive educational institution.

6. Impact on Heritage and Long-Term Development

The Pavilion also underpins the school's long-term plans to:

- Restore and conserve Gad's Hill Place, the Grade I listed home of Charles Dickens, a site of national literary importance;
- Continue our partnership with Gravesham's tourism department to ensure the house remains open to the public at designated times;
- Develop new, permanent learning accommodation on the site, designed to:
 - Replace temporary structures (like the Pavilion) with better designed, more in-keeping and aesthetically pleasing buildings, in the future;
 - Improve energy efficiency and educational design;
 - Enhance community access to this historic and culturally significant site.

Loss of the Pavilion would derail these ambitions, as operational disruption and falling enrolment would eliminate the capacity to invest in site improvement or heritage protection. It would be a step further away from, not toward, these valuable goals.

Conversely, retaining the Pavilion enables the School to prioritise funding for essential conservation work on Gad's Hill Place (including structural repairs to floors, staircases and ceilings), aligning with heritage objectives that were pre-consulted with Historic England and Gravesham Borough Council (as part of an alternative phased master plan) and ensuring the long-term protection of the Grade I listed asset.

The school has undertaken significant restoration efforts, as custodians of Gad's Hill Place, including the faithful reconstruction of the cupola and ongoing structural investigations and associated repairs. These efforts ensure the preservation of a site of national literary importance.

The proposed refurbishment of the Pavilion, including a sedum roof that blends with the landscape and natural timber cladding which will weather to a recessive silver-grey, will significantly reduce its visual impact, preserving key historic views from Dickens' former bedroom and the conservatory.

These measures will significantly reduce the level of harm to the setting of the historic house, while preserving the school's ability to function.

7. Environmental Benefits

The Pavilion's refurbishment delivers clear environmental advantages:

- Carbon Efficiency - Retaining and upgrading the existing structure preserves its embodied carbon, avoiding the emissions associated with demolition and new construction.
- Improved Energy Performance - The new roof and cladding will meet modern thermal standards, reducing energy use for heating and cooling.
- Biodiversity Enhancement - The sedum roof will:
 - Support pollinators and invertebrates.
 - Reduce surface water runoff and mitigate flooding.
 - Contribute to carbon sequestration.

The proposal to retain the Pavilion avoids disruption to mature trees and local habitats, preserving the ecological character of the site while improving the Pavilion's environmental performance.

8. Public Benefits of the School: Community, Social and Economic Impacts

The school:

- Educates 358 pupils aged 3–16, many of whom live in Gravesham;
- Employs over 100 staff, including teachers, teaching assistants, administrators, kitchen and site staff;
- Supports local suppliers, contractors and trades;
- Plays an active role in Gravesham's cultural, educational, and historical life;
- Provides use of its site, often at cost, to local organisations, clubs and youth movements, including Higham Eagles football club, netball leagues, archery clubs, local scout groups, and drama schools;
- Hosts Dickens tours and performances, organised in partnership with Gravesham and the Dickens Trust and Dickens Fellowship;
- Hosted the joint milestone celebration with Gravesham Borough Council in summer 2024;
- Hosts educational meetings including local Headteacher associations and primary moderation sessions to which teachers of local schools are invited;

- Invites pupils from local state primary schools to attend school productions;
- Offers significant scholarships and means-tested bursaries to support local families.

The closure or weakening of the school would:

- Displace pupils at all stages of their education;
- Have a negative effect on children's mental health for those who need the specialist teaching spaces as a major component of their learning and development;
- Remove an independent education option in the region;
- Cause local job losses;
- Sever the school's role as custodian of a nationally significant heritage site;
- Weaken the area's educational and cultural offering.

The Pavilion thus supports not just the school, but the wider Gravesham community.

9. Planning and Policy Context

We acknowledge the Pavilion was approved under temporary planning consent, but:

- Its use has evolved to become central to the school's operation;
- It supports the school's ability to deliver on policy goals, including:
 - High-quality education;
 - Safeguarding of national heritage;
 - Local employment and economic stability;
 - Sustainable site development with future public benefit.

We are open to:

- Discussions on visual improvements, landscaping, or external treatment of the building;
- A clear phasing strategy leading to permanent replacement buildings;
- A long-term masterplan for the site aligning with educational and community goals.

However, immediate removal of the Pavilion is not viable. It would cause disproportionate harm and cut off progress toward more sustainable and ambitious long-term development.

Conclusion

The Pavilion is essential to:

- Our ability to deliver a compliant, balanced, and enriching education;
- Support children's mental health and enrichment in the provision of arts-based learning and development
- Our capacity to retain pupils and meet parental expectations;
- The school's operational continuity;
- The protection and future opening of Gad's Hill Place, a building of national significance;
- Advancing the school's sustainability goals through low-impact refurbishment;
- Our strategic aim to replace temporary structures with permanent facilities;
- The educational, economic, and cultural health of the wider community.

We therefore request that planning consent for the Pavilion be renewed or made permanent, in recognition of its critical, irreplaceable role in the life of the school and the community it serves