



Heritage Impact Assessment

Former Guru
Nanak Darbar
Gurdwara,
Clarence Place,
Gravesend

June 2022 | Project Ref 1851

HCUK Group is a multi-disciplinary environmental practice offering expert advice in archaeology, heritage, landscape, arboriculture, and planning. It began life in 2010 as Heritage Collective LLP, before becoming Heritage Collective UK Limited in 2014. In the coming years diversification saw the addition of Archaeology Collective, Landscape Collective and Planning Collective, before all strands came together to be branded under a single umbrella: HCUK Group, based on the acronym for the original company. A home working company since the beginning, we are pleased to employ a talented workforce of consultants and support staff, who are on hand to advise our clients.



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1. Introduction

- 1.1** This Heritage Impact Assessment has been prepared by Dr Jonathan Edis, Director of HCUK Group, on behalf of Guru Nanak Darbar Gurdwara. It relates to the proposed residential conversion (to 14 apartments) of the former Milton Mount Congregational Church, Clarence Place, Gravesend, which was most recently used as a place of worship known as Siri Guru Nanak Darbar Gurdwara.
- 1.2** Built in the 1870s as Milton Mount College, or Milton Mount Congregational Church, the former gurdwara occupies the majority of a rectangular site that fronts onto Clarence Place and slopes downhill backing onto William Street¹. It was designed by the architect John Sulman (1849-1924) and was later used as a school and a warehouse before being bought by Gravesend Sikh Community in 1967. For simplicity the whole building is variously referred to as “the building” and “the church”, and “the gurdwara”.
- 1.3** The site has a long and complex planning history. For present purposes, the most relevant part of the planning history is an appeal decision dated 5 July 2021 (APP/K2230/W/20/3255909) relating to the then proposed demolition of the building and the construction of a new building containing 16 two-bedroom apartments and 3 one-bedroom apartments with associated infrastructure. The appeal was dismissed, drawing a line under the notion of demolition and redevelopment. The present application adopts a completely different route, aimed at conversion. There have been discussions with the council on the amended proposal, since the appeal was dismissed.
- 1.4** The author of this assessment has nearly forty years of continuous employment in the heritage sector, including ten years as a conservation officer advising local planning authorities on applications affecting heritage assets. A large number of those cases have involved works affecting places of worship in conservation areas.

¹ William Street is not included within the boundary of Windmill Hill Conservation Area.

2. Relevant Planning Policy Framework

- 2.1** The council is required by sections 16(2) and 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The council must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.² Section 66(1) is relevant to the effect of the proposal on the setting of Gravesend War Memorial, listed grade II, and discussed further below.
- 2.2** There is a broadly similar duty arising from section 72(1) of the Act in respect of planning decisions relating to development within conservation areas – in this case, Windmill Hill Conservation Area.
- 2.3** For the purposes of this assessment, preservation equates to an absence of harm.³ Harm is defined in paragraph 84 of Historic England’s Conservation Principles as change which erodes the significance of a heritage asset.⁴
- 2.4** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.
- 2.5** The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:

"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."

² Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137.

³ South Lakeland v SSE [1992] 2 AC 141.

⁴ Conservation Principles, 2008, paragraph 84.

- 2.6** Historic England has published guidance on development affecting the setting of heritage assets in *The Setting of Heritage Assets* (second edition, December 2017), better known as GPA3. The guidance proposes a stepped approach to assessment in which Step 1 involves the identification of the relevant heritage assets, Step 2 establishes their significance, and Step 3 describes how the change within the setting of the assets might affect their significance. In cases where there is a resultant loss in significance, amounting to harm, Step 4 is engaged, requiring the discussion of mitigation.
- 2.7** The NPPF requires the impact on the significance of a designated heritage asset⁵ to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁶ The Scale of Harm is tabulated at Appendix 1.
- 2.8** Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit. Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:
- “Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.”*
- 2.9** Paragraph 199 of the NPPF states that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

⁵ The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

⁶ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

2.10 Paragraph 203 of the NPPF refers to the approach to be taken towards non-designated heritage assets as follows:

"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

2.11 Paragraph 203 of the NPPF is applicable to the former church and gurdwara.

2.12 Local heritage policy has been taken into account in the preparation of this assessment, notably the council's character of Windmill Hill Conservation Area, 2007.

3. Statement of Significance

Introduction

- 3.1** This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and it comments on the contribution of setting to significance.

Windmill Hill Conservation Area

- 3.2** Windmill Hill Conservation Area is self-evidently a place of special architectural and historic interest, and heritage significance. It is described as follows in paragraph 4 of appeal decision APP/K2230/W/20/3255909:

"The Conservation Area is particularly characterised as a primarily residential suburb containing a large number of buildings of architectural and historic interest. It exemplifies 19th century suburban development in Gravesend. Clarence Place lies at the edge of Windmill Hill and Windmill Hill Gardens. The topography has shaped the street pattern, with narrow lanes leading up the steep slopes of the hill. The predominant building forms for the Conservation Area as a whole are paired villas and terraces. The gardens of many properties generally contribute to the spacious and green character of the streetscene."

- 3.3** The application site is within Character Area 1 which consists of Clarence Place, Windmill Hill Gardens and Parrock Street (Figure 1).

The former church and gurdwara

- 3.4** The former church and gurdwara (Figures 1 to 6) is described as follows in paragraphs 5, 6 and 7 of appeal decision APP/K2230/W/20/3255909:

"The [...] building is included within the Windmill Hill Conservation Area Character Appraisal 2007 ('CACA') as one of the principal landmarks in the Conservation Area. Designed by John Sulman and constructed in 1873 as the Milton Congregational Church and lecture hall, the CACA notes that it is a feature building in views along the street, and from other parts of the Conservation Area. It is also shown as being

one of the buildings of local interest on the Designations Map within the CACA and as a 'positive building' within the Townscape Appraisal Map.

The building incorporating a prominent front gable with gothic windows and doors has a strong presence within the streetscene. Whilst Clarence Place itself is generally characterised by paired two and three storey villas, the former church provides an architectural and visual break to the predominant building form and in doing so adds considerable interest to the appearance of this part of the Conservation Area. Whilst it contrasts with other surrounding buildings, its strong presence and form within the streetscene is consistent with the religious and community roles it has previously performed, justifying its status as a prominent and important landmark building within the Conservation Area. As well as making a positive contribution to the character and appearance of the Conservation Area the building is also in itself a non-designated heritage asset.

It has also been the subject of alteration (including a stucco coat) and extensions which to a certain extent have reduced its architectural quality and appearance. However, it remains a landmark building of some considerable architectural and historical interest which makes a positive contribution to both the character and appearance of the Conservation Area. The insides of the building have also been altered and damaged though this has little effect on its external appearance. Whilst it is larger than the adjacent dwellings, the buildings sit together to form an important group."

3.5

The history of the former church and gurdwara has been rehearsed at length in previous assessments. For present purposes, it is sufficient to record that the architect of Milton Mount Congregational Church was John Sulman (1849-1924) and that construction began in the 1870s. The building was adapted for use as a warehouse in the 1950s and 1960s, before being acquired by the Sikh community of Gravesend in 1967. An application for statutory listing was rejected in 2009.

Gravesend War Memorial

3.6

Consideration was given to Gravesend War memorial (Figure 6) in paragraph 25 of appeal decision APP/K2230/W/20/3255909, under the heading of "other matters":

"A Grade II listed war memorial is located within Windmill Hill Gardens. It is set within a formal park layout including pathways and lawned sections with substantial

trees on either side. Its immediate setting within the park provides a calm ambience in which it can be appreciated. The appeal building forms part of its wider visual setting within the street, though there is no historical connection between the memorial and the former church. Whilst the [church] is visible from it, it is not located directly opposite and is on the other side of the road to it [...]"

3.7 The official reason for designation of the memorial is explained in the National Heritage List as follows:

*"Gravesend War Memorial, unveiled in 1922, is listed at Grade II for the following principal reasons: * Historic interest: as an eloquent witness to the tragic impact of world events on the local community, and the sacrifice it made in the conflicts of the C20; * Architectural interest: a well-executed stone memorial surmounted by a fine bronze statue of a winged Victory; * Historic Association: with another well-executed and listed First World War memorial in nearby Northfleet, also by sculptor Francis W Doyle Jones (Bevan's War Memorial NHLE 1391662)."*

3.8 The memorial is clearly a structure of special architectural and historic interest.

Summary of significance

3.9 Windmill Hill Conservation Area is self-evidently a place of special architectural and historic interest, and heritage significance.

3.10 Gravesend War Memorial is a structure of special architectural and historic interest.

3.11 The former church and gurdwara is a landmark building of some architectural and historical interest which makes a positive contribution to both the character and appearance of the conservation area. It is a non-designated heritage asset.

4. Heritage Impact Assessment

Introduction

- 4.1** This chapter of the assessment describes how the proposed development will affect the setting and significance of the heritage assets identified in the preceding chapter.

Proposed development

- 4.2** The proposed development involves the conversion of the original church and gurdwara, and its associated structures, into 14 apartments.

Effect on the former church and gurdwara

- 4.3** Conversion of the former church and gurdwara will inevitably have a significant effect on internal spaces, and the internal character of the building, but this is bound to be a consequence of retaining the external shell – itself a consequence of appeal decision APP/K2230/W/20/3255909 (Figure 4). Given that the building is not listed as being of special interest, the internal spaces and characteristics will have to be sacrificed in order to make the conversion viable. The landlocked nature of the site is a further constraint in this regard.

- 4.4** Some external alterations will be needed as part of the conversion, primarily:
- Alterations to openings on the gabled front elevation.
 - Alterations to openings on the rear elevation facing William Street, on the edge of the conservation area.
 - Demolition of the left hand side extension, and alterations to openings on this side.
 - Minor demolitions on the right hand side, and alterations to openings.

- 4.5** No significant historic fabric will be lost as a result of the demolitions, and the changes to openings will have a relatively minor effect on the external character of the building. The essential envelope of the former church will be preserved.

- 4.6** Overall, the effect of the conversion will be to preserve the non-designated heritage asset as a landmark building that will continue to make a positive contribution to the character and appearance of the conservation area.

Effect on Windmill Hill Conservation Area

- 4.7** It is self-evident that, by converting and preserving the non-designated heritage asset, and ensuring that it continues to be a landmark (Figure 5), the character and appearance of Windmill Hill Conservation Area will be preserved. There will be no harm to the significance of the conservation area, and paragraphs 202 and 202 of the NPPF will not be engaged. The effect will fall off the bottom of the scale in Appendix 1.
- 4.8** To the extent that a landmark building will be reused, and will generate inward investment, there will be enhancement. As a minimum, the council can discharge the duty under section 72(1) of the Act in the knowledge that the character and appearance of the conservation area will be preserved.

Effect on Gravesend War Memorial

- 4.9** Paragraph 25 of appeal decision APP/K2230/W/20/3255909 confirmed that the then proposal to demolish and redevelop the former church and gurdwara would not detract from the setting and significance of the listed war memorial because of the distance and physical separation between the two. The same must apply to the present proposal – more so, because the outer shell and fabric will remain unchanged (Figure 6). The council ought to discharge the duty under section 66(1) of the Act, for an abundance of caution, but it is evident that the setting of the war memorial will be preserved.

Summary of effects

- 4.10** The effect of the conversion of the former church and gurdwara preserve a non-designated heritage asset and landmark building that will continue to make a positive contribution to the character and appearance of Windmill Hill Conservation Area.

- 4.11** Internal changes to the former church and gurdwara will be inevitable, and there will be some relatively minor changes to the exterior – but the essential form and envelope will be preserved. These effects need to be considered in light of the regenerative consequences of the conversion, which will bring about inward investment, activity, and the reuse of a heritage asset.
- 4.12** There will be no conflict with national or local heritage policy.

Gravesham Borough Council

5. Conclusions

- 5.1** Windmill Hill Conservation Area is a place of special architectural and historic interest, and heritage significance.
- 5.2** Gravesend War Memorial is a structure of special architectural and historic interest.
- 5.3** The former church and gurdwara is a landmark building of some architectural and historical interest which makes a positive contribution to both the character and appearance of the conservation area. It is a non-designated heritage asset.
- 5.4** The proposed development involves the conversion of the original church and gurdwara, and its associated structures, into 14 apartments.
- 5.5** The effect of the conversion of the former church and gurdwara preserve a non-designated heritage asset and landmark building that will continue to make a positive contribution to the character and appearance of Windmill Hill Conservation Area.
- 5.6** Internal changes to the former church and gurdwara will be inevitable, and there will be some relatively minor changes to the exterior – but the essential form and envelope will be preserved. These effects need to be considered in light of the regenerative consequences of the conversion, which will bring about inward investment, activity, and the reuse of a heritage asset.
- 5.7** There will be no conflict with national or local heritage policy.

Appendix 1

Scale of Harm

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019



Figure 1 – Location map, taken from the Designations Map in the Council’s appraisal of Windmill Hill Conservation Area. All the buildings shown yellow are identified as buildings of local interest. The boundary of the conservation area is marked blue. The war memorial was not listed (red buildings) at the time the map was prepared.



Figure 2 – Main south gabled elevation of the former church and gurdwara.



Figure 3 – The rear elevation, in William Street.



Figure 4 – The nave, looking south.



Figure 5 – The former church and gurdwara as a landmark, seen from Windmill Hill.



Figure 6 – The former church and gurdwara seen in juxtaposition with the war memorial.