

| Conservation and Urban Design | |
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| Application No: | 22/01221/F & 22/01028/LA |
| Address: | St Christophers School Westbury Park Bristol |
| Description: | Proposed development of the site including, internal and external alterations of Listed House building and conversion of lodges fronting Westbury Park; demolition of buildings and the erection of new buildings to provide an integrated Retirement Community (Class C2) for older people; together with landscaping, car parking, refuse and other associated works (major). |
| Case Officer: | Paul Chick |
| Date: | 24/2/2022 |

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| No Objection - | |
| No Objection subject to Conditions described below - | |
| Not acceptable in the current form. See comments suggestions below - | |
| Object, Please see comments below - | <input checked="" type="checkbox"/> |

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| <u>Summary:</u> | <p>The proposal in principle for the redevelopment of the site to optimize density in accordance with the Urban Living SPD is supported.</p> <p>Urban Design, Conservation, Nature Conservation, Arboriculture and landscape officers raised a range of concerns in relation to this pre-planning application submission. Largely, the concerns expressed during the previous application remain unresolved.</p> <p>Accordingly, the concerns raised (see below) in regard to the impact on the Listed building and Conservation Area character; the building scale, form, massing, grain and landscape proposals of the proposed development indicates the current proposals are unacceptable in their current form.</p> <p>These comments reflect the concerns raised by Design West regarding height scale and massing delivering a compromised public realm between buildings.</p> |
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Full Response:

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| Site/ Context: (DM26, DM31 UL Pt 1 Q1.1-1.3, UL Pt 3 Q3.1-3.3) | <p>Context</p> <p>The site is set within the Downs Conversation Area. It comprises of 6 substantial Victorian villas overlooking the Durdham Downs and a verdant back land area of informal treed area creating the setting for several pavilion buildings including Grace House a Grade II listed building. These buildings are predominantly single storey.</p> <p>The detached character of the individual Villas with open garden setting is part of the special character of the Conservation Area that needs preservation, they front onto a generous green open area designated as a Local historic Park and Garden.</p> <p>The Downs Conversation Area states two of the 'General Enhancement Objectives' are as follows:</p> <p><i>'(5) Where conversion of large dwelling houses into flats results in a significant increase in car parking provision and acts detrimentally to the quality of the open landscaping in the Conservation Area, it will be resisted.</i></p> <p><i>'(6) The intensification with residential use of landscaped gardens to older dwelling houses will be resisted.'</i></p> <p>Principle of buildings to be removed</p> |
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| | <p>The proposals include the demolition of eight buildings in the back land area. While justification has been provided, it is considered that this insufficient considering to the quality of the 1920's building at the back of at the back of Hampton Lodge has been given. This building has architectural value and represents a heritage building that adds to the character of the Conservation Area.</p> <p>Further, the design and massing of Block A is not supportable, (see comments below). In light of this further consideration should be given to adaptive re-use of Harwood House and possibly parts of Groves Hall. Although this is closely located to Grace House, the design and architectural detailing is sensitive to the Grade II listed building with a positive relationship. This has not been achieved with the proposed building.</p> <p>The retention of the entrance building from Bayswater Avenue would be better re-purposed than the proposed building joined to Grace House.</p> |
| <p>Height, scale and massing (DM26,DM27, DM29,DM30, DM31, UL Pt1 Q1.1-1.6 UL Pt 2 Q2.1-2.8 UL Pt 3 Q3.1-3.3),</p> | <p>Principle of building heights, scale and massing</p> <p>The site comprises of six Victorian Villas along Westbury Park which are 2 storey at the front and between 2.5 and 3 storey at the back due to the landform. This part of the Conservation Area has a prevailing heigh of 2/3 storey.</p> <p>The existing backland buildings apart from Grace House are proposed to be demolished and replaced with new build apartment blocks ranging from three to six storey and two storey cottages at the southern and eastern part of the site. These new buildings and conversion of the existing villas will provide 122 units and new community hub within Grace House with 65 parking spaces.</p> <p>While the principle a 'Villa' typology into the back land part of the site is supported, the height, scale, massing and layout of the new apartment blocks raises the following issues;</p> <ul style="list-style-type: none"> The six storey Block B represents a building of amplified height highly visible above the height of the existing frontage Villas along Westbury Park from the Downs. This is a sensitive view from the Downs (View 6 of the Verified Views). The existing Villas heights along the park edge are the focal features edging the park. Accordingly, the existing Villas heights should be a height constraint to developing the back land area. The height of Block B is contrary to DM Policy 26 which states that infill developments should be; <i>'subservient in height, scale and massing to the primary frontage building'</i>. <p>Further the Downs Conservation Area Description states: <i>'The quality and consistency of building material in many localities edging the Downs gives a distinctive character which is very sensitive to change and replacement.'</i></p> <p>Apartment B is also visible above the height of The Glen above the height of Villas D incongruous to the 2/3 storey prevailing height of the Conservation Area.</p> <ul style="list-style-type: none"> The proposed blocks of flats A and B encroach on the primacy of Grace House due to the proximity, height and massing. Both Block A at 3 storeys and Block B at 6 storeys are higher than Grace House, (Block B considerably). The proximity distances of 7m from Block A to Grace House and between 11-15m to Block B combined with the massing and height would overwhelm Grace and intrude insensitively on the setting undermining its primacy. This condition is exacerbated due to the incongruous geometric relationship, architectural detailing and location of plant meters away from Grace House along the northern elevation. This approach is contrary to DM31 Heritage Assets. The separation distances between apartment block A, B, C, D and the existing Villas |

combined with the building heights creates an uncomfortable public realm microclimate affecting liveability issues such as outlook, privacy and daylight/sunlight issues for the lower floors. The separation distances are;

- 10m between Block A and Kenwith Lodge;
- 12m between Block B and Hampton Lodge;
- 13m between Block A and B reduced to approximately 11m with balcony;
- 15m between Block B and C reduced to approximately 13m with balcony;
- 10m between Block C and Garisbrook Lodge;
- 10m between Block D and Cottages reduced to approximately 8m with balcony

These separation distances are well below the nationally accepted 21m window to window distance at 2 storey.

The daylight/sunlight report shows that 44% of the proposed block windows, 39% of the cottage windows, 16% of the existing Villas windows and not will meet the ADF value with trees.

- The relationship between the buildings and the space between the buildings delivers a 1:1 ratio. The National Design Codes and Urban Design Compendium suggest the most extreme enclosure ratio that is acceptable is 1:1.

The enclosure ratio between Apartment Block A,B,C, D, the cottages, Hampton and Kenwith Lodge are broadly 1:1. This ratio would be only be acceptable in the city centre context should all amenity conditions be satisfied but inappropriate to this loose grain verdant back land character area an attribute of the Conservation Area.

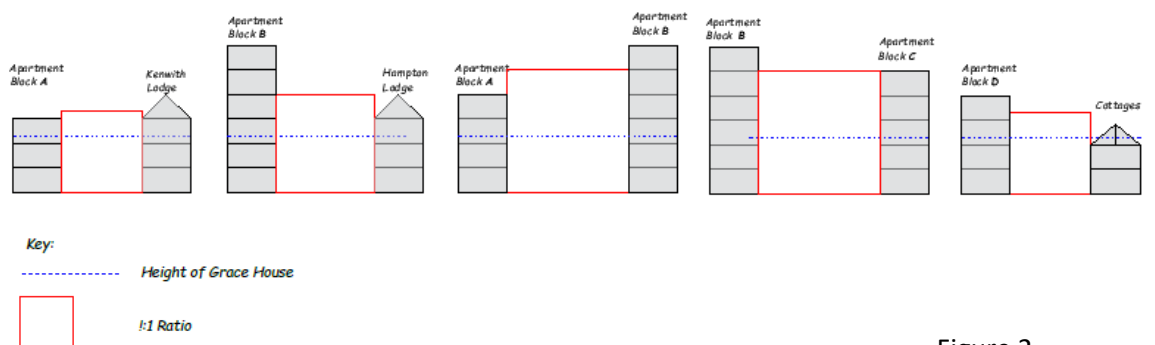


Figure 2 –

Enclosure ratios of the proposals between Apartment Block A, B, C and D.

This ratio will affect how these spaces are experienced with overbearing buildings either side of narrow, overshadowed areas of public realm which will impact tree growth due to lack of light. The shadow analysis within the D&A Statement show these spaces will be overshadowed for most of the year.

- The VuCity views illustrating that the scale and massing of the apartment blocks are the largest building in the area, even taking into the account the larger building to the south. The scale and massing of the proposed Apartment blocks are therefore inappropriate to the context.
- Block D at four storeys has frontage at a distance of 18m reduced to approximately 16 with the balconies looks directly onto the back gardens of properties along The Glen, affecting privacy and reducing the daylight/sunlight to some properties edging the site.

In summary, it is considered that the height, scale and massing of the proposed Villas are too large;

- Creating a group of buildings inappropriate scaled to the character of the Conservation

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| | <p>Area undermining the verdant character of the site affecting view from the Downs.</p> <ul style="list-style-type: none"> • Detracting from the significance of the designated heritage asset and its role as a primary focal building within the site. As the Court of Appeal emphasized in Barnwell, that ‘<i>a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted.</i>’ <p>The height, scale and massing should be reduced to allow for an enhanced landscape setting to the buildings and configured to create visual permeability and a continuous landscape link through the site to the Downs.</p> <p>The cottages to the backs of the houses along Bayswater Avenue are in some instances less than the nationally accepted separation distance of 21m from the existing houses potentially impacting on their amenity. The pair of the most northerly of these cottages requires the removal of a group of existing trees, undermining the well-treed character of the site. It is recommended this pair of cottages be removed to allow the retention of the tree group.</p> <p>Further, the proposed single storey building directly to the east of Grace House detracts from views of Grace House from the entrance and is not supported. Particularly as the architectural treatment related poorly to the existing building. The existing building in this location would benefit from adaptive re-use and wouldn't require removal of trees.</p> <p>Additional Information</p> <p>The TVIA should be revised to acknowledge that the site's susceptibility to change is high. This is an area within a Conservation Area with historic Villas edging the Downs an Important Open Space, Local Historic Parks and Garden and Site of Nature Conservation Interest. Additionally, the value of the verdant back land area should be recognised to the character of the Conservation Area as a historic garden area that creates the setting for the Grade II listed Grace House. Additional verified views are required;</p> <ol style="list-style-type: none"> 1. From the Downs side of Wesbury Park looking through the gap between Hampton Lodge and Alveston Lodge; 2. From the southernmost point of the Wellness Pod looking towards the Block B and D; 3. From the centre of the road between Block C and Carisbrooke Lodge looking north. <p>This full application requires a topographical survey and plan showing existing and proposed levels including ridge heights of all the buildings with finished floor levels of new buildings to fully assess the impact on Grace House and quality of the public realm between buildings.</p> <p>A daylight/sunlight report should fully assess the Vertical Sky Component to windows, this is currently missing for the proposed blocks and existing Villas on site. Further an assessment in accordance with BRE Guidance to show that the landscape between buildings received two or more hours of sunlight on 21st March is necessary.</p> |
| <p>Impact on Listed building (DM31, DM26)</p> | <p>As far as the application relates to it, the architectural and historic significance of Grade II Listed Grace House stems from its original designed use as a purpose-built Steiner school, its use of striking geometrical forms, modern materials, and the appreciation of the pavilion form building within a designed open verdant green parkland-style setting.</p> <p>The proposed scale of the surrounding development is significantly over and above the 2-storey Listed building. The proximity of these new blocks to the Listed building is uncomfortable. This leads to an overcrowding and overbearing impact on Grace House.</p> <p>The proposed extension to the east end of the building upsets the original design principles</p> |

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| | <p>where the clearly articulated use of pure geometrical forms is lost. The scale of the new element is significant in footprint and would be visually unbalancing effect, where the diamond form and near symmetry of Grace house would be impacted. It's notable that where new facilities were planned for the site these were located separate and away from Grace House in order to maintain its singular design concept.</p> <p>The effect of the new extension, the truncation of the green setting, addition of visual clutter, hard surfacing, and over-dominant new development harms the building's setting.</p> <p>The proposals seek to raise the ground level around the whole building. This would remove the shadow gap below the façade elements which tend to appear as though floating above the ground surface, and obscure the lower framed section of mullion façade sections. The proposal would result in the foreshortening of the building and loss of the designed proportions and impact.</p> <p>The internal alterations would diminish the clear geometrical layout where internal walls are proposed to be opened out and the original cellular planform diluted. The formation of two new staircases through the building appears unjustified in the context of the Listed building, and it's unclear what alternatives have been explored that might better protect the historic fabric, should the proposals be structurally viable.</p> <p>There is the strong opinion that the existing aluminium framed windows are the originals. Where the lowering of cills is proposed, and the loss of windows required, the harm is not clearly justified. The addition of canopies to some facades is not detailed and it's unclear how strongly horizontal features would be integrated within the vertical emphasis of the pentagon facades without breaking the visual flow upwards.</p> <p>There is harm posed to the Listed building and its setting for the reasons identified above. By definition the Listed building is of national architectural and historic importance. We are required to place great weight in its conservation. Presently there's inadequate justification for the harm posed to the Listed building, aside from that on the protected character of the Conservation Area. Whilst there is benefit in bringing the building back into use its not demonstrated that this is the best approach to achieving that in the context of the proposals as a whole.</p> <p>Whilst the social and economic benefits of the proposals are significant they require a significant degree of harm to heritage assets to secure them. We do not believe that the benefit offsets the harm posed, or that a more appropriate form of development couldn't achieve proportionately equal or greater benefits.</p> |
| <p>Site Layout and Public Realm (DM26, DM27, DM29, DM30 UL Pt1 Q1.1-1.6 UL Pt 2 Q2.1-2.8 UL Pt 3 Q3.1-3.3, 3.7-3.9):</p> | <p>Public realm and layout along the Villas Frontages</p> <p>The layout locates car parking along the frontage within the front gardens and removes the boundaries between all the existing Villas except between Hampton Lodge and Alveston Lodge. This replaces parts of the front gardens with hardscape areas and removes the plot definition between the lodges downgrading the character of the Villas and their landscape setting fronting the park. The Villas present a substantial and formal front edging the Downs together with their related gardens are particularly sensitive to change as they make a significant contribution to the expansive and sylvan quality of the Downs. The Downs Conservation Area Statement states;</p> <p><i>'Where conversion of large dwelling houses into flats results in a significant increase in car parking provision and acts detrimentally to the quality of the open landscaping in the Conservation Area, it will be resisted.'</i></p> <p>A key issue stated within the The Downs Conservation Area Statement is;</p> |

'The loss of traditional boundary walls, piers and gates, to allow car parking in gardens downgrades the character of the period dwellings and their landscaped settings.'

The continuous pathway along the Villas fails to distinguish between the separate buildings creates a homogenous area of green removing the plot definition between Villas which is not supportable.

Public realm and layout behind the Villas

The layout of the proposed blocks and their relationship between the existing Villas has delivered;

- The north/south access road creating a homogenous area of hardscape between the Villas backs and Block A,B, and C. The highway is faced with the backs of the existing Villas and the side elevations of the proposed blocks. This lacks distinction between public fronts and private back of the proposed blocks undermining the function of the spaces between the buildings.
- A grouping arrangement of the proposed Blocks and geometry of the buildings which has sought to reflect the Grace House geometry. However, the building geometry appears haphazard rather than a distinct reflection of the Grace House.
- An internal configuration of the block delivers Block B frontage looking toward the back of Block C and the back of Block D elevation facing the central green space with frontage balconies looking directly into the back garden along The Glen affecting privacy for the existing residents and lacking distinction between public fronts and private backs;
- Ill-defined public route through the site lacking legibility and design coherence. It is also a concern that pedestrian could potentially penetrate the semi-private gated areas from the south of Block D and can access all sides of Block A which impacts on privacy at ground floor and fails to accord with 'secure by design principles'.
- Limit space between block A, B, C, D and between Block A, B and Grace House resulting in areas of verge are too narrow to be considered as having meaningful amenity value or achieving viable long term tree planting. As demonstrated in the Daylight/sunlight report these trees impact the lower floors and would come under pressure to be removed to allow additional light into the buildings.
- Service area to the north of Grace House undermining its setting with tarmac and plant areas;
- The cottages along the eastern boundary relate poorly to the surrounding development and a lack of coherent integrated built form with properties backs visible from the Bayswater Avenue.
- Poorly associated car parking area for the terrace of four cottages along the eastern boundary resulting in a long walk for elderly residents from the car park to their dwelling;
- Creates long distances for the elderly residents to take bins for collection.

In summary, the layout with limited spaces between buildings and single access point along Westbury Park necessitates increases access roads to allow pedestrians and cars to penetrate the site. This has delivered an overshadowed public realm directly behind the Villas and between the proposed buildings dominated with hard standing detracting from the overall quality of the site and lacking qualities that delivers high quality placemaking.

The proposals represent an opportunity to reinstate the historic boundaries better associating the car parking with the individual existing and proposed villas. This approach would utilise the existing access roads defining the fronts and backs of the buildings and ensuring the area between the existing and proposed villas does not become a homogeneously large area of parking. Development will be expected to take reasonable opportunities to improve the area's character, enclosure, permeability, public realm and appearance and better integrate the area

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| <p>Landscape (DM26, DM27, DM28, UL Pt1 Q1.1-1.6 UL Pt 2 Q2.1-2.8 UL Pt 3 Q3.1-3.3, 3.7-3.9)</p> | <p>with its surroundings.</p> <p>This existing site is characterised by a mature informal well-treed backland area with the detached Villas along the Westbury Park edge characterised by large front gardens and the remains of some rear gardens with mature conifers and deciduous trees, shrubs, and hedges.</p> <p>Entrance Area and Central Green Space</p> <p>The development within the site has necessitated considerable tree loss (46 in total) roughly half of all the trees on site. Particularly concerning is the loss of the majority of the woodland group near the entrance from Bayswater Avenue which gives this area the inform well-treed setting for Grace House allowing visual permeability to the landscape setting.</p> <p>The loss of the trees around the entrance area and central green space and the proposed hedgerows around this area defines the car parking area and green space edge. This disassociated Grace House from the entrance and central green area that creates the central green space setting enclosing Grace House both physically and visually removing visual permeability of Grace House from the entrance and green space.</p> <p>The proposed trees in this area are shown planted too close together and too close to Grace House to have long term viability. Therefore not the proposed trees cannot be considered as adequate replacements.</p> <p>The design of the central space is also considered to be overly fussy with;</p> <ul style="list-style-type: none"> • Two footpaths with 2m of each other along the southern edge; • A pond too small to add to the amenity of the area and; • Three other elements not specified in the key that would potentially detract from the open green informal character required to create a positive landscape setting for Grace House over formalising the area with clutter. <p>Area between the Villas backs and proposed blocks</p> <p>The area between the Villas and proposed blocks delivers a large area of the site with tree planting within the building edge threshold space with only a minimal area of garden between Block B/C and south of Block D.</p> <p>Most of the trees in this area are shown planted too closed to the buildings affecting the long-term viability of the trees. Accordingly, much of this tree planting should be discounted. This results in the majority of this area as being dominated with hardscape with only ground level minimal green threshold space around the proposed blocks. Further the more generous area between block B and C is broadly made up of pathways around cycle stands and a pond too small to have amenity value.</p> <p>The garden area to the south of Block D is small overly fussy in design. The Downs Conservation Area Statement is;</p> <p><i>'The intensification with residential use of landscaped gardens to older dwelling houses will be resisted.'</i></p> <p>The Villas frontage</p> <p>Concerns related to the Villas frontage have been covered in previous section. Additionally, some</p> |
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| | <p>of the tree planting within the frontage areas are not considered too close to allow trees to reach maturity.</p> <p>It should be noted some tree species in the back gardens are too big to be appropriate.</p> <p>In summary the landscape proposed undermines the well-treed character of the site by removing a large percentage of trees with many replacement trees located too close to buildings to be viable long-term. The proposed hedgerows diminish the open character and setting of the Grade II listed building and the green space designs are overly complicated to attune with the informal character of the site.</p> <p>The public realm should be the product of a clear landscape led strategy to inform the layout and ensure the informal verdant character is retained with visual permeability with every effort taken to retain more trees, especially around the entrance.</p> |
| <p>Design of new buildings (DM29, DM26, DM31, UL Pt 1 Q1.1-1.6 UL Pt2 Q2.6-2.8 UL Pt3 Q3.1-3.3)</p> | <p>The architectural attributes of the existing building are well described in the WPCA Character Assessment as;</p> <p><i>‘Villas, the properties now known as the St Christopher’s Lodges are independent villas with their own gardens all around. Each is different, but they follow a consistent repertoire of form and details, in a mixed style intermediary between Regency and Victorian. All are of two high storeys with shallow roofs, not very visible, stone-built at back and front, often, but not always, using tall round topped windows as a key feature. Clear string courses divide the walls rather uncomfortably from the angled and sometimes adjacent circular-topped gables. Canted bays are used on occasion, and heavy eaves divide walls from roofs. Chimneys are tall and decorated but not a significant feature’</i></p> <p><i>And</i></p> <p><i>‘Materials Palette is limestone ashlar with stucco render to side elevations with roof coverings of slate, with some clay tile, and some replacement concrete tile. Chimney stacks limestone ashlar, or brick with clay pots’.</i></p> <p>As detailed in previous sections the principal issues of height, scale, massing, layout and form of the proposed buildings is not supportable. Any comments on the appearance of the buildings should be considered in this context.</p> <p>While the proposed buildings have a window rhythm, the proportions of the windows need to reflect the existing Villas. Further, the elevational and roofscape treatment of the new blocks are generic and lack a positive relationship with the Villas and building aesthetic within the Conservation Area. Block A is particularly jarring directly adjacent to the fine architectural detailing of Grace House due to the proximity.</p> <p>The mansard roof storey, projecting balconies and materiality to the apartment blocks particularly is considered incongruous to the area. Policy DM26 Local Character and Distinctiveness states proposed architecture will be expected to;</p> <p><i>‘Reflecting locally characteristic architectural styles, rhythms, patterns, features and themes taking account of their scale and proportion;’</i></p> <p>Elevational treatments information should include depth of window and door reveals.</p> |

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| | <p>The internal layout of flat is supported, although every effort should be made to deliver natural light to the circulation spaces and increase the legibility of the entrances.</p> <p>Materiality</p> <p>The buff brick and PCC metal roofs are not considered appropriate to the context and should be revised.</p> |
| <p>Alterations to existing buildings (DM30, DM26, DM31, SPD2, UL Pt1 Q1.1-1.3 UL Pt3 3.1.-3.3)</p> | <p>Broadly, the changes to the existing buildings are supported apart from the balconies and alterations to the associated windows at 1st and 2nd floors. The rationale for the replacement staircase needs to be understood.</p> <p>All other minor issues can be negotiated once the principle outstanding issues of height, scale, massing and layout have been resolved.</p> |
| <p>Nature Conservation (DM26)</p> | |
| <p>Public Art (DM26)</p> | <p>No art strategy has been provided</p> |