



Historic England

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Direct Dial: 0117 975 0742

Our ref: P01477694

12 April 2022

Dear Mr Chick

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

**ST CHRISTOPHERS SCHOOL WESTBURY PARK BRISTOL BS6 7JE  
Application No. 22/01221/F**

Thank you for your letter of 29 March 2022 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

**Significance of Designated Heritage Assets**

The application site is associated primarily with the land to the rear of a series of mid-19<sup>th</sup> century villas that overlook The Downs. These were constructed between 1855 and 1875 and designed as a series of architectural set pieces, situated within generous landscaped plots. One such villa, Carisbrooke Lodge was converted to a school by the 1920's and the rear gardens were subsequently developed with ancillary buildings, including North House in 1927. The site expanded, taking over 5 of the villas and St Christopher's School was then established in 1945.

Of particular note is the addition of Grace House, built in 1966 and designed by Alec French and Partners. Grace House was listed Grade II in 2019 on account of its architectural and historic interest. The building is a one-off design for a Steiner teaching block, specifically designed for disabled children and the physical expression of the school's educational philosophy and ethos as a Steiner school, demonstrated in its architectural form. Most pertinent to the proposed development is the contribution that the setting of Grace House contributes to its heritage significance. The submitted Built Heritage Statement acknowledges that the setting of Grace House contributes to its significance and that the original design intentions for the multi-faced building to



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address the open garden setting (as shown in the architectural model on Plate 31) responds positively to the character of the Conservation Area.

While tangential to our statutory remit, the development of the school site and its existing buildings contribute to the character and appearance of the Conservation Area in varying degrees. We defer the assessment of other individual school buildings, some proposed for demolition, to your conservation specialist with regard to their architectural interest and contribution to the Conservation Area.

The wider Conservation Area setting to the site has a distinct character defined by large villas set overlooking principal open spaces with verdant landscaping between. Secondary streets include generous pairs of later 19<sup>th</sup> century semi-detached dwellings, more modest terraces and some 20<sup>th</sup> century infill. While building proportions are suitably generous and indicative of their architecture, there is a clear ambient building height across this area with a modest rise to the three storey villas in Westbury Park .

### **Summary of proposals.**

The proposed development of the site includes internal and external alterations to Grace House, 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, together with landscaping, car parking, refuse and other associated works (major)

### **Impact of the Proposed Development**

As the backland to the former villas has already undergone a significant amount of change over the last one hundred years, we do not object to the principle of re-development and a change of use of the site. As the former use of the site has come to an end, we support the principal of re-use of historic buildings and replacement buildings that make a meaningful and positive response to their context. The principal impacts are two-fold: the impact upon the setting of Grace House and the impact upon the character and appearance of the Conservation Area.

While we task your conservation specialist with fully assessing the impact of the proposed new buildings on the setting of the Grade II building, we consider that its present garden setting would be compromised, by virtue of eroding its primacy within the garden landscape, particularly by the massing and height of Villa B at 6 stories. The key views and vistas identified on p60 of the Design and Access Statement would not provide the unchallenged views of the southern aspect of Grace House as



presently experienced. These views would only provide narrow, channelled glimpses with the dominant structures of the new buildings in the foreground. The garden setting and character of the site would undergo such a degree of change, which would counter the character of this part of the Conservation Area.

Regarding impacts from outside the site and particularly from the open area of The Downs, where the villas are best viewed as a group, these are demonstrated in the submitted verified views. Notably, viewpoints 3 and 6 confirm that the central 6 storey block would appear above existing buildings, drawing undue attention in an area of an established ambient building height. Viewpoint 6 is particularly telling in how the mansard roof over Villa B would appear visually heavy against the common roof forms of the area. We advise that a reduction of two stories from this block may reduce this impact to a more acceptable level.

This is a high-density scheme that we consider to be harmful to the character and appearance of the Conservation Area. We believe that the site is capable of being re-developed in a manner that responds positively to the setting of Grace House, while delivering a layout, massing and design that is clearly more contextual than that currently proposed.

## Planning Legislation & Policy Context

Central to our consultation advice is the requirement of the Planning (Listed Buildings and Conservation Areas) Act 1990 in Section 66(1) for the local authority to “have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses”. Section 72 of the act refers to the council’s need to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in the exercise of their duties. When considering the current proposals, in line with Para 194 of the NPPF, the significance of the asset’s setting requires consideration. Para 199 states that in considering the impact of proposed development on significance great weight should be given to the asset’s conservation and that the more important the asset the greater the weight should be. Para 200 goes on to say that clear and convincing justification is needed if there is loss or harm.

Historic England’s advice is provided in line with the importance attached to significance and setting with respect to heritage assets as recognised by the Government’s revised National Planning Policy Framework (NPPF) and in guidance, including the Planning Practice Guidance (PPG), and good practice advice notes produced by Historic England on behalf of the Historic Environment Forum (Historic



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Environment Good Practice Advice in Planning Notes (2015 & 2017)) including in particular The Setting of Heritage Assets (GPA3).

Heritage assets are an irreplaceable resource NPPF 189 and consequently in making your determination your authority will need to ensure you are satisfied you have sufficient information regarding the significance of the heritage assets affected, including any contribution made by their settings to understand the potential impact of the proposal on their significance NPPF 194, and so to inform your own assessment of whether there is conflict between any aspect of the proposal and those assets' significance and if so how that might be avoided or minimised NPPF 195.

The significance of a heritage asset can be harmed or lost through alteration or destruction of the asset or development within its setting. As heritage assets are irreplaceable, any harm (whether substantial or less than substantial) is to be given great weight, and any harm to, or loss of, the significance of a designated heritage asset (or site of equivalent significance) should require clear and convincing justification.

## **Recommendation**

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 199, 200 and 206 of the NPPF. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

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

Yours sincerely

**Stephen Guy**

Inspector of Historic Buildings and Areas

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cc: David Martyn, Conservation Architect



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