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14 April 2022

Dear Paul Chick

RE: 22/01221/f

St Christopher's School, Westbury Park, Bristol, BS6 7JE

Thank you for consulting the Twentieth Century Society on the above application for the proposed development of the site to provide an integrated Retirement Community. Of concern to the Society are the proposals to convert the Grade II listed Grace House into the Amicala Club and demolish the unlisted post-war school buildings. The site is located within the boundaries of The Downs Conservation Area. The Society **strongly objects** to the application due to the harm that would be caused to the listed Grace House and due to the total demolition of buildings which should be considered Non-Designated Heritage Assets (NDHAs).

Background

St Christopher's School was founded in 1945 by Catherine Grace (1907-86) as a private residential Steiner school for children with learning difficulties. Influenced by the ideas of the philosopher and esoteric Rudolf Steiner (1861-25), Steiner schools encouraged the development of the total self - spiritual and emotional, rather than purely rational - through close proximity with nature and through performance, movement (eurhythmy) and music. The school initially occupied a Victorian house but expanded in the post-war period with the construction of new purpose-built school buildings on the site. In the 1970s, educational policy moved towards the increased integration of disabled children in schools and, after the 1981 Education Act, St Christopher's School focused on the education and care of children with severe disabilities. Post-war school buildings on the site include Grace House of 1966 by noted Bristol-based architects Alec F. French and Partners, and two other

buildings by French, Harwood Lodge, dining and classroom facilities built in the 1970s, and Konig Lodge, the infirmary building erected in the 1980s.

Policy

Grace House was designated Grade II in 2019 and the site falls within The Downs Conservation Area (designated in 1981). Great weight should be given to the conservation of the special interest of both. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that “In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority [...] shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.” Section 72 requests that local authorities pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework (NPPF, 2021) includes paragraph 199 which 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 [...] This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.” Paragraph 200 states that any harm to, or loss of, significance should require clear and convincing justification.

Harwood Lodge and Konig Lodge were part of the post-war development of the school by Alec French, architect of Grace House. We consider these buildings to be of historic significance and architectural merit and maintain that they should be treated as Non-Designated Heritage Assets. The NPPF states that local authorities should take into account desirability of conserving heritage assets and putting them to viable uses consistent with their conservation for the benefit of communities (paragraphs 189 and 197). Paragraph 203 asks local authorities to consider the effect of an application on the significance of NDHAs.

Comments

The Society has serious heritage concerns about the level of alteration proposed to the Grade II Grace House.

We are concerned about the proposed alterations to the interior plan, which includes changes to the sub-division of rooms and access points, which would not only result in the loss of original fabric but would change the relationship between the rooms. The current arrangement largely follows the original layout. In the original plan, there is a clear hierarchy

of spaces, made up of the larger, shared entrance and circulation spaces, separate classrooms and connected quiet areas and stores. These spaces have been carefully planned with Steiner's educational philosophy in mind. The list entry identifies interest in

“the physical expression of the school's educational philosophy and ethos as a Steiner school in its architectural form”; “its meticulous planning as a series of geometric organic volumes added together in rhythmical way to create an image of ever-expanding growth that reflects Steiner's ideology” and “the good level of survival both externally and internally retaining many of its original fixtures and fittings”.

The proposed alterations to the interior would lessen the legibility of the plan and room functions, which are central to the building's architectural interest. We also have more specific concerns about the work required to facilitate inserting a kitchen into a former classroom (GF4) and feel that this would be inappropriate and would harm the existing fabric.

Concerning exterior alterations are also proposed, including the creation of 8 new doorways and extension with a 'spa area'. We consider that the building could be repurposed without the need for a spa extension and therefore maintain that the harm caused by this addition is not justified.

If the club use proposed would necessitate this many alterations to the Grade II building then we ask if an alternative use could be found. Offices, for instance, with points of public access would likely require fewer harmful alterations.

Lastly, the Society opposes the proposal to demolish Harwood Lodge and Konig Lodge. These post-war buildings are part of the story of the development of the school in the post-war period and are of clear architectural merit. Their demolition would result in the total loss of what should be considered NDHAs which could be adapted and reused.

The proposed high-density, newly-landscaped development would, in our view, erode the character of the original landscape around the school, having a detrimental impact on the setting of the Grade II listed Grace House and appearance of the conservation area.

For these reasons, the Society strongly objects to the application, maintaining that it contravenes key national policies concerning the conservation of heritage assets. We urge the local authority to refuse planning permission.

We hope that these comments are of use to you. Please do not hesitate to get in touch if the scheme is amended or if you require further advice. We would be grateful if you could please inform us of your decision on this application.

Yours sincerely,

Coco Whittaker

Caseworker

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Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

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