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Date: 13th March 2025

Mr Jack Stirling
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Dear Jack,

Re: Thamesfield, Wargrave Road, Remenham – Review of built heritage LPA representation & statutory consultees' consultation responses

I have reviewed the representation on the application made by the LPA's Built Heritage Officer of February 2025, and the consultation responses from Historic England of 4th February 2025 and that of South Oxfordshire District Council of February 2025.

Potentially affected built heritage assets

The Built Heritage Officer's representation correctly notes [p.1] that the proposed development Site is wholly within the Remenham Henley Bridge Conservation Area and forms a part (in my view specifically a very small part) of the wider setting to Henley Conservation Area [BHS from 3.14 and from 3.18].

However, contrary to their assessment [and set out in detail in my built heritage statement (BHS) section 3], the Site does not form any part of the setting to the Grade II listed Bird Place; Bird Place Cottage; The Little Angel; Henley Royal Regatta Headquarters; The Angel; 18 Thameside; Rectory and Coach house on Thameside; 11-12 Thameside; the Old Granary; Baltic House; River Terrace and Obelisk; the Grade II* Church of St. Mary; and the Grade I listed Henley Bridge. Most of these assets are wholly screened from the Site by an area of dense mature trees and vegetation, combined with some built form, to the north and northwest of the Site [BHS 3.9]. The LPA Case Officer's pre-application note of 21st September 2023 accepts that '*the new building would not be visible from Henley Bridge as viewed from the Remenham side of the river and from the riverbank to the north*' [pp 11-12].

Of the remaining assets noted in the Heritage Officer's representation, the obelisk to the southwest of the Site is screened by intervening vegetation within the Site and, most particularly, vegetation on the nearest ait. River Terrace to the west of the Site is largely screened by the noted trees to the northwest of the Site and is otherwise partly screened in filtered views by trees and other vegetation along the Site's riverbank. Additionally, while the Site is close to the western boundary of the Grade II* Registered Park and Garden of Park Place and Temple Combe, this asset's significance is primarily related to highly significant elements and individual assets wholly screened from the Site by the dense woodland beyond the rising slopes to the east of the Site and far to the south of the Site [BHS 3.10-3.13].

As a consequence, the Site only offers a contribution to the character and appearance (significance) of the two noted conservation areas and to the significance of no other built heritage asset.

The representation also notes a number of buildings close to the Site built in the 1990s. It is correctly concluded that these are not built heritage assets.

The pre-application meeting, with the Case Officer and his colleague Keith Frost, of 15th August 2023 and the subsequent Case Officer's pre-application note of 21st September 2023, did not identify any of the assets noted in the representation that I discount here (and in the BHS) from detailed consideration in this case.

The representation states that *'trees can be easily felled, hedging lost and thus there may not always be detachment between buildings'* [p.3]. This is not an incorrect statement, however, trees and hedges can also be planted and, invariably, also grow. The BHS can only reasonably assess the baseline conditions in their current condition at the point of submission of the application. As such, the BHS correctly identifies only the two conservation areas as the potentially affected built heritage assets, while the representation appears to assess an alternate baseline.

Thamesfield as a potential non-designated built heritage asset

The LPA have identified Thamesfield as a non-designated heritage asset (as they are advised in the PPG is their right to do so in the application determination process) but provide no assessment against a measurable published criteria to justify that assertion. The representation claims that Thamesfield can be identified as a non-designated built heritage asset by the LPA [p.2]. This was previously asserted by the Case Officer in his pre-application note of 21st September 2023 (but not by his heritage colleague cited in that note). The representation notes and asserts that:

'Thamesfield is a Victorian riverside mansion, of c.1870, which was altered and enlarged in the late nineteenth century. The building was further altered and extended in the twentieth century including changing function from a single residential dwelling to first a youth centre and subsequently a nursing home and retirement complex, of which it stands today. Whilst the building is altered and the site developed, the original white stuccoed Victorian mansion is still very clearly read and is highly prominent on the Berkshire bank of the river with landmark quality'.

While the southern corner of the building originates in the later nineteenth-century, it is not *'very clearly'* legible as such or *'prominent'* as such in available views of Thamesfield's south-western façade from the Henley riverbank. Many of the later nineteenth and the twentieth-century modifications and extensions largely maintain the architectural ratios and details of a Classical revivalism style, all finished in a white stucco and expressed along the south-western elevation, that merge and mask the modifications and extensions such that the original c.1870 core at the southern corner of the current building is identifiable in no views from beyond the Site [BHS 3.24].

Additionally, the fact that Thamesfield delivers a positive contribution to the character and appearance of the Conservation Area, does not, of itself, meet any criteria for identifying the building as a non-designated heritage asset. Similarly, just because a small element of the building dates to c.1875 does not automatically identify the building as a non-designated heritage asset. It is my view that not only is the surviving later nineteenth-century element not readily legible, but that the numerous nineteenth-century and subsequent phases of alterations and extensions has significantly eroded any former architectural and historic interest that the Victorian building once held in the nineteenth century, such that Thamesfield cannot now be identified as a non-designated heritage asset. As such, there would be no need to assess any impact on Thamesfield in the application's supporting built heritage statement.

The PPG states that:

'plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to the public to provide greater clarity and certainty for developer and decision makers. This includes information on the criteria used to select non-designated heritage assets and information about the location of existing assets' [18a-040].

Additionally, that planning authorities *'should ensure that up to date information about non-designated heritage assets is included in the local historic environment record'*. Wokingham Borough Council currently maintains a *'List of Buildings of Traditional Local Character'* (there is currently no schedule labelled as non-designated heritage assets). Thamesfield is not identified on this List. The Berkshire HER includes no record for Thamesfield.

Notwithstanding my conclusion that Thamesfield is not a non-designated built heritage asset, the proposed development includes no demolition or other direct impact on the surviving form and any fabric, where present, of the original 1870s' building in the southern corner of the current building.

Proposed development - density

The representation characterises the Remenham Henley Bridge Conservation Area as *'low density, with a gentle built character and verdant context'* [p.3]. It is agreed that the southern portion of the Area's character and appearance, in which the Site is situated, is in well-treed, parkland-like plots with a low-density built form compared to Henley to the west [BHS from 3.18]. The representation labels these contrasting characters as *'villagescape'* and *'townscape'* [p.4] and then asserts that the proposed development will introduce a *'compact urban'* form to the Conservation Area [p.4].

I do not concur with this latter assessment. The proposed new built form set out in the application, a further extension to Thamesfield, will largely introduce new built form within an area currently wrapped around by or within the footprint of the existing building [BHS 4.7]. As such, the proposed development will not change this part of the Conservation Area's character and appearance of a low-density built form.

Proposed development – materials and architectural form

The representation asserts that the:

'Proposal of a replacement residential block in a contemporary language drastically contrasts with the host's (immediate and wider) architectural forms, that of a traditional eighteenth, nineteenth and early twentieth-century polite and domestic revival vernacular. The highly modernistic aesthetic introduces a bellicose form to the established architectural language which conflicts with the traditional appearance of the host'.

The proposal is noted in the representation as architecturally honest but as 'jarring', 'bellicose' and holding a degree of 'outrecuidance'. At the meeting of 15th August, the question was raised as to whether or not the client's design team should look to maintain the architectural detailing, ratios and white stucco finish of the building's south-western elevation. We were advised by Keith Frost that this would not be an acceptable approach. The case officer's pre-application note of 21st September 2023 states that [pp 12-13]:

'Whilst it is acknowledged the choice of external materials would normally be expected to reflect and/or compliment the finish of the existing buildings to give visual coherency across the site, in this case it is not necessarily the right approach. [...].

The option for a white render finish to the ground and first-floor partition of the new building, this approach would mean the new build would visually tie in with the white stucco of the river frontage building. However, this approach is undesirable as there is a need for the proposed building to be seemingly visually read as part of the architecturally interesting riverside aspect of Thamesfield. This approach would blur the legibility and defined extent of that element of interest.

Whilst there is a degree of reservation in adding further to the mix of external materials used across the Thamesfield site, the option to use a red/orange coloured brick, traditional to the area (and is to be found in the neighbouring Remenham Row development to the north of the site and in the boundary wall between the two sites) is thought to have merit in this case.

The use of a red/orange brick is thought to help root the new building, in terms of materials used to this locality. As such in terms of external finish to the new building the use of the red/orange brick (as seen on page 16 of the pre-application presentation document) is the favoured choice here as this creates a clear discernible contrast between this development and the white stucco part of Thamesfield'.

As such, the submitted application's consideration of materials and finish took on board the pre-application advice received from the LPA and had a significant influence on the form and materiality of the scheme set out in the application.

Proposed development – scale

The proposed development includes an element of a third storey. This does not triple the existing height of Thamesfield, as alleged in the representation [p.2]. The dark colouring of the proposed roof seeks to reflect the current roofing material's colour and does not seek 'to dominate and overshadow' Thamesfield and the surrounding area [pp 3-4].

The proposed third-storey element is significantly set back from Thamesfield's western façade, existing eaves levels will be maintained and will, as a result, deliver a visually minimal impact in views from the west. The third-storey element will not be visible from the north (beyond the existing adjacent built form and vegetation) and will similarly have a minimal visual presence from the south and east [BHS section 4].

Historic England and South Oxfordshire District Council representations

The representation from South Oxfordshire District Council on the proposed outline application largely defers to that of Historic England. It includes a photograph of the stronger view of Thamesfield's south-western elevation from the Henley riverbank taken during midwinter.

The Historic England representation raises its only concern as the proposed development's alleged effect on the setting to the Henley Conservation Area. The representation raises no other built heritage concerns with the proposal set out in the application and includes a minimal level of assessment to support its conclusions.

There are only filtered views of the western elevation of Thamesfield from a limited part of the western riverbank in Henley Conservation Area [BHS 4.5-4.6] [see the photograph in the SODC representation]. The Site forms

a very small part of the Conservation Area's wider setting [BHS from 3.14]. The white stucco south-western elevation will remain the most dominant visual element of Thamesfield in this view, with the proposed third storey very much less visually dominant and recessive in character. The proposal will deliver a small level of change to Thamesfield that will largely be imperceptible from much of the Henley Conservation Area. As such, the proposal will deliver a negligible level of harm to the character and appearance of Henley Conservation Area [BHS 4.5-4.6].

Summary and conclusion

The Heritage Officer's representation wholly overstates the proposed development's impacts on the historic built environment. This is not only my conclusion, but that too of Historic England, as evidenced by their consultation response of 4th February 2025 that only identifies any degree of alleged heritage harm from the scheme to the significance of Henley Conservation Area.

The LPA Heritage Officer's representation has also introduced numerous additional concerns regarding the application, compared to those aired at the pre-application meeting of 15th August 2023 and set out in the Case Officer's pre-application note of 21st September 2023. The meeting and the note largely concentrated on the emerging scheme's materiality and finish. I was shocked to see how the representation extensively expanded on the previously noted built heritage concerns from Wokingham Borough Council.

It remains my assessment that the proposed development will deliver change in a small part of the Remenham Henley Bridge Conservation Area and to a very small part of the wider setting to the Henley Conservation Area that will have no greater than a negligible impact on their character and appearance.

Notwithstanding my assessment and conclusion, should the decision maker conclude that the proposed development will deliver a level of harm to the significance of any of the two identified conservation areas, this will necessarily be low within that spectrum. I understand that your planning consultant, from their assessment, that this level of harm would be outweighed by the proposed scheme's public benefits. As such, this would deliver a clear and convincing justification for such a level of heritage harm, even with the great weight necessarily applied to such harm. It is concluded, therefore, that it remains that the scheme offers no heritage objection to warrant a refusal of the application.

Yours sincerely,
for RPS Consulting Services Ltd



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