



**Thamesfield
Wargrave Road
Remenham
Berks**
Planning Statement

On behalf of **Retirement Villages Development Limited**

Project Ref: 35138/A5/P1a/LD | Date: December 2024

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Document Control Sheet

Project Name: Thamesfield

Project Ref: 33313513800

Report Title: Planning Statement

Doc Ref: A5 P1a

Date: 6 December 2024

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Revision	Date	Description	Prepared	Reviewed	Approved
P1	26/09/23	Planning Statement Draft	LD	JEH	JEH
P1a	06/12/2024	Planning Statement Final	LD/CAD	GF	GF

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1 INTRODUCTION

1.1.1 Stantec has been instructed by Retirement Villages Development Limited (the 'Applicant') to prepare and submit a full planning application for the partial redevelopment of Thamesfield Retirement Village, Wargrave Road, Remenham (hereafter referred to as the Site). A Site Location Plan (Drawing no 2212-P-001) has been submitted alongside this application.

1.1.2 The application seeks full planning permission for:

“Part demolition of existing building and replacement with a three-storey extension to provide extra-care units (Use Class C2), with associated soft and hard landscaping works; provision of additional vehicle parking, bin stores and ancillary structures; and alterations to existing basement”.

1.2 Planning Application Pack

1.2.1 This Planning Statement provides an assessment of the proposals in consideration of relevant national and local planning policy. The following documents have also been submitted in support of this application and should be read in conjunction with this Statement:

- Application Form and Ownership Certificates
- Arboricultural Impact Assessment
- Archaeological Report
- Architectural Plans
- Bat Survey Report
- Biodiversity Net Gain Assessment
- CIL Additional Information Form
- Covering Letter
- Daylight and Sunlight Reporting
- Design and Access Statement
- Drainage Strategy (Foul and Surface Water)
- Economic Benefit Statement
- Energy and Sustainability Statement
- Extra Care Needs Assessment
- Financial Viability Assessment
- Flood Risk Assessment
- Heritage Statement
- Landscape and Visual Impact Assessment
- Landscape Plans
- Landscape Strategy

- Environmental Noise Survey
- Preliminary Ecological Appraisal
- Statement of Community Involvement
- Structural Survey
- Transport Assessment

1.2.2 A full list of the architectural and landscape plans and report references is contained within the planning application covering letter.

1.2.3 Taken together, these documents provide a full and detailed analysis of the proposed development.

1.2.4 The proposed development lies within Wokingham Borough Council ('the Council') and therefore this Planning Statement has considered the proposal against the relevant policies of the Council's Adopted Development Plan.

1.3 Scope and Purpose of the Planning Statement

1.3.1 The purpose of this Planning Statement is to assess the planning merits of the application, explain the form and content of the application proposals against adopted and emerging policy guidance and best practice, and to assess the proposals in the light of any other material considerations.

1.3.2 The proposed development needs to be assessed in the context of the Development Plan and other material considerations. This statement carries out that assessment and seeks to address the implications of the development of the Site on the surrounding area.

1.3.3 The structure of this Planning Statement is as follows:

- Section 2 describes the Application Site and the main features of the surrounding area and the planning history;
- Section 3 outlines the main components and features of the proposed development;
- Section 4 details the Pre-Application engagement with the Council;
- Section 5 outlines the relevant planning policy context of the Application Site and the proposed development;
- Section 6 provides our planning assessment of the proposed development including overall compliance with adopted Development Plan Policy and other material considerations; and
- Section 7 provides a summary and our conclusion on the proposed development.

2 SITE LOCATION AND DESCRIPTION

2.1.1 This Section provides detail on the Application Site's location, surroundings and key physical characteristics. A Site Location Plan (Drawing no 2212-P-001) has been submitted alongside this application.

2.2 The Site

2.2.1 Thamesfield is an established and operational Integrated Retirement Community (IRC), or retirement village, providing extra care retirement accommodation and associated communal facilities. The Site currently comprises 37 extra care units (use class C2). All residents benefit from support services, amenities and on-site care. Historically, Thamesfield has provided housing with care (self-contained units) and care rooms/suites (non-self-contained accommodation provided as a package with personal or nursing care).

2.2.2 The Applicant has been reviewing the operation of the village over the last few years. The care rooms/suites have recently been repurposed into extra care units, communal facilities and offices. Certificates of Lawfulness were obtained from WBC prior to the start of the works as set out further below.

2.2.3 In addition, the Applicant has been reviewing the layout of the village and how this serves the Applicant and its residents. The village has developed incrementally in a piecemeal fashion over the years and there are several key issues with the existing layout. This includes sub-optimal circulation around the Site, inefficient use of space and underutilised areas, and the limited scale (number of homes/households). It has been identified that there are opportunities in the northern part of the Site to improve the existing communal space and ensure vitality and viability over the longer term.

2.2.4 The Site is located within the administrative boundary of Wokingham Borough Council. It is broadly square in shape and comprises approximately 0.88ha of land. The Application Site is located within the village of Remenham directly opposite Henley-on-Thames, however for planning policy purposes it falls within open countryside.

2.2.5 Thamesfield contains two buildings - the main building, which is a series of linked buildings, located in the northern part of the village and Thamesfield Lodge which is located in the eastern corner. As illustrated in the Design and Access Statement, the main building comprises four distinct elements: the original Stucco Fronted building (labelled as Block A) which fronts on to the Thames, the late 20th century extension to the north (Block B); the 1993 extension which is adjacent to the northern boundary of the Site (Blocks C and D), and the 1995 extension which is broadly centrally located within the Site (Block E). The extra care retirement accommodation is made up of one- and two-bedroom apartments.

- 2.2.6 A mix of hard and soft landscaping cover the remainder of the Site including car parking, a croquet lawn and a landscaped lawn down to the banks of the River Thames. Internal circulation routes include access to the parking areas at the northern and eastern parts of the Site, the turning circle and drop off point to the east of the main building and to the service yard which sits in the middle of the main range of buildings. Waste and recycling are collected from the individual units by the building management and moved to a refuse store area within the service yard. There are also pedestrian routes around the Site including accesses to buildings and communal spaces, around the front lawn and down to the river.
- 2.2.7 The Site is bordered by the River Thames to the south west. Wargrave Road lies to the north east and the Site frontage is formed by a group of trees with brick wall and railings beyond. To the north west there are the Remenham Row retirement properties and the boundary between the Site and these properties is formed by a brick wall, trees and vegetation. To the south east is the Eyot Centre.
- 2.2.8 Vehicular and pedestrian access to the Site is currently directly off Wargrave Road. There are two access points to the Site, located on the Site's north eastern boundary. The southernmost access point provides vehicular access, with the other gated access providing pedestrian access only. Wargrave Road is identified as a 'Green Route' by WBC.
- 2.2.9 The Site lies within the outer edge of land designated as the London Metropolitan Green Belt, which covers a large area of the north west of the Borough. The Metropolitan Green Belt was designated to limit the urban sprawl of London. The Site lies on the western edge of the London Metropolitan Green Belt with the River Thames forming the western boundary of the Green Belt in this area.
- 2.2.10 The Site is located within the Remenham Henley Bridge Conservation Area and is opposite the Henley Conservation Area on the western side of the River Thames.
- 2.2.11 The Grade II* Registered Park and Garden - Park Place and Temple is located c.25m to the southeast of the Site.
- 2.2.12 Historic England's online mapping system confirms that there are no designated heritage assets located within the Site. However, there are a number of designated assets in the Site's vicinity. The closest listed buildings to the Site are listed below:
- The Little Angel (Grade II, NHLE: 1154556): situated c.100m north of the Site.
 - Obelisk (At Junction of Marlow Road and Northfield End) (Grade II, NHLE: 1219514): situated c.120m southwest of the Site.
 - Bird Place (Grade II, NHLE: 1319073): situated c.130 northwest of the Site.
 - Bird Place Cottage (Grade II, NHLE: 1154558): situated c.130m northwest of the Site.

- Henley Royal Regatta Headquarters (Grade II, NHLE: 1449077): situated c.170m north-west of the Site.
- Henley Bridge (Grade I, NHLE: 1117419): situated c.240m northwest of the Site.
- River Terrace (Grade II, NHLE: 1219559): situated c.155m northwest of the Site.
- Garden Wall and Gate Piers at River Terrace (Grade II, NHLE: 1369143): situated c.150m northwest of the Site.
- Angel Hotel including attached Medieval Arch (Grade II*, NHLE: 1047786): situated c.250m northwest of the Site.

2.2.13 The buildings on the Site are not included on WBC's local list of Buildings of Traditional Local Character.

2.2.14 There is a large concentration of listed buildings within Henley-on-Thames on the other side of the River Thames to the north west, these include and buildings along Thameside and Hart Street such as the Church of St Mary the Virgin (Grade II*, NHLE: 1218999): situated c.320m northwest of the Site.

2.2.15 The Site falls within a SSSI Impact Risk Zone but is not subject to any other formal ecological designations. There is a Local Wildlife Site approximately 320m to the east of the Site.

2.2.16 There are several individual and groups of trees that are subject to Tree Preservation Orders. This includes the group of trees in the south western corner of the Site and the group along the frontage of the Site with Wargrave Road. These are set out in full in the Arboricultural Report submitted with the application.

2.2.17 The Environment Agency's online mapping system shows that the Site is located within Flood Zones 2 and 3, and that the Site is identified to have 'Very Low' risk of flooding from surface water. According to the EA's map application groundwater map, the Site is considered to be at medium to high risk of groundwater flooding.

2.2.18 The Site is within the AWE Special Case Consultation Zone - Major Nuclear Site. The Office for Nuclear Regulation requests to be consulted on planning applications, irrespective of distance from nuclear sites, for special cases. These represent developments that either introduce a new hazard or change the existing external hazards posed to nuclear sites and so this is not relevant to this application.

2.3 The Surrounding Area

2.3.1 The surrounding area comprises a diverse mix of uses, including residential, sports and hospitality. The Site is a short distance (c. 300m) from Henley Bridge which can be used to cross the River and, as such, is well located in respect of the facilities and services within

Henley-on-Thames. Henley-on-Thames is identified as a 'Market Town' within South Oxfordshire District Council's Development Plan. Market Towns are defined as having the ability to support the most sustainable patterns of living within South Oxfordshire through their current levels of facilities, services and employment opportunities.

2.3.2 There is existing bus stop provision along Wargrave Road in the Site's vicinity. The number 850 bus offers services to High Wycombe and central Reading. Henley-on-Thames train station is located approximately 1km from the Site and offers services to London and Reading via Twyford.

Planning History

2.3.3 The Planning history relevant to the Site as available via the Council's website is summarised in the table below.

Table 1: Planning History

Ref	Description	Decision	Decision Date
232364	Application for submission of details to comply with the following condition of planning consent 222333 dated 11/10/2022. Condition 7 relates to external lighting.	Approved	23/01/2024
230660	Application for submission of details to comply with the following condition of planning consent 222333 dated 11/10/2022. Condition 3. Terrace Details.	Approved	21/03/2023
222333	Full application for the proposed erection of first floor, side balcony, ground floor rear terrace, addition to and alterations to existing rooflights with removal of 1 no. roof lantern and other changes to fenestration.	Approved	11/10/2022
222058	Application for a certificate of lawfulness for the proposed internal alterations to include communal facilities, ancillary offices and 2no. extra care residential units.	Approved	26/08/2022
222059	Application for a certificate of lawfulness for the proposed internal alterations to first and second floors to include 5no. extra care residential units.	Approved	26/08/2022
192494	Application for a certificate of lawfulness for the proposed replacement of 9 old wooden arch topped windows and 2 doors with arched top lights and replaced with a uPVC window and door system designed to look the same as existing and to be used in a conservation area.	Approved	17/10/2019

040867 F/2004/3605	Proposed infill extension to nursing home to improve staff facilities and alterations to laundry access.	Approved	21/02/2005
041633 F/2004/1565 APP/X0360/A04 /1170401	Proposed two storey extension to provide ancillary office accommodation for nursing home and staff facilities.	Refused Dismissed at appeal	WBC refusal 06/10/2004. Appeal decision 08/02/2006
032531 CLP/2003/0823	Application for a Certificate of Lawful proposed development for internal alterations to form 4 close care units.	Approved	14/01/2004
031864 F/2003/9901	Proposed pitched roof bay window at first floor level, patio and 2 lift shaft enclosures to north east and west elevations.	Approved	10/10/2003
031993 F/2003/9272	Proposed installation of flat roof bay window at first floor level of nursing home, patio and 2 x lift shaft enclosures to north and east elevations.	Refused	25/07/2003
031994 F/2003/9273	Proposed formation of 4 windows, cellar door and steps to south west elevation of nursing home. Plus glazed linkway.	Approved	25/07/2003
031015 F/2003/8938	Proposed change of use from (C3) residential to (C2) nursing home accommodation (this relates to the Lodge).	Approved	24/06/2003
021802 CLP/2002/8107	Application for Certificate of Lawfulness of proposed development for internal alterations to nursing home to form close care units.	Approved	14/02/2003
020530 F/2002/7122	Proposed single storey side extension to dwelling, demolition of existing porch and outhouses.	Approve	30/10/2002
991874 99/70564/F APP/X0360/A/0 0/1043525	Proposed Single Storey Rear Extension to Form Conservatory (this relates to the Lodge).	Refused Dismissed at appeal	09/12/1999. Appeal decision 10/10/2000

3 PROPOSED DEVELOPMENT

3.1.1 The application seeks full planning permission for:

“Part demolition of existing building and replacement with a three-storey extension to provide extra-care units (Use Class C2), with associated soft and hard landscaping works; provision of additional vehicle parking, bin stores and ancillary structures; and alterations to existing basement”.

Background

- 3.1.2 Retirement Villages has been developing and operating housing-with-care communities since 1981. The Applicant first built a community of its kind in the UK at Cranleigh, Surrey and today operates 16no sites across the country with over 1,500 self-contained homes.
- 3.1.3 As set out in the Description of Site and Surroundings Section of this report, Thamesfield currently comprises 37 extra-care units (use class C2).
- 3.1.4 The piecemeal development of buildings and extensions at Thamesfield means that the functionality of the Site is compromised, principally in terms of scale (number of households/homes) and circulation. The proposed re-development of the building's northern wing therefore seeks to better utilise this area of the Site which currently accommodates single storey residential units, inefficient circulation and 'left over' external spaces. With the proposed scheme the Applicant aims to improve the quality of the development and maximise the efficiency of its operation.
- 3.1.5 The new extra-care units will provide high quality accommodation for residents and the scheme as a whole will improve the provision of services and facilities and environment for existing and future residents.

The Proposal

- 3.1.6 The application comprises the following elements:
- Demolition of Block C which contains 3 units and link corridor to Block D.
 - Erection of extension to the rear of block B to include 17 extra-care units (use class C2) and supporting services such as laundry rooms and plant.
 - Remodelling of central courtyard – to provide improved legibility and circulation.

- Provision of landscaping to provide improved amenity for residents, including spaces for rest, recreation and outdoor activity and the retention of existing features such as trees and hedgerows.
- Provision of 8 additional car parking spaces, to provide a total of 39 car parking spaces.
- Alterations to existing basement and to the internal layout of the retained building.

3.1.7 The new building will include a total of 17 extra care apartments 2 of these will be 1-bedroom apartments and 15 will be 2-bedroom apartments.

3.1.8 It is considered that the existing communal facilities on the Site will be sufficient to serve the additional extra care units. However, the proposal does include alterations to the internal layout of the retained building such as an improved kitchen, multifunctional room and library, laundry room, office and plant space. It should be noted that earlier phases of work already completed improved the community and back of house spaces, which with the further changes now proposed are considered adequate for the enlarged community.

Proposed Layout and Design

3.1.9 The proposed site layout and design has been informed by the Site's context and surroundings and has evolved as a result of consultation with residents and the Council.

3.1.10 The layout of the proposed development is set out within the proposed site plan drawing 2212-P-100 submitted with this planning application. The full design details, design development and design rationale are presented in detail in the accompanying Design and Access Statement (DAS).

3.1.11 As set out in the above, the northern area of the Site was identified as having potential for redevelopment given the inefficient layout, low quality of built form, quantity of single storey buildings, poor circulation and issues with the functionality of spaces such as the central courtyard. It was also identified that there was an opportunity to better utilise some of the key spaces and positive features within this area.

3.1.12 The proposal comprises the proposed demolition of Block C and part of Block D and replacement with a three-storey extension around a central courtyard. The new building would be built broadly on the footprint of Block C, albeit set back further from the northern boundary of the Site (boundary with Remenham Row) and with space between the new building and Block D which is to be retained. The siting of the building will create more space around buildings to allow for a remodelled central courtyard, and space along the northern boundary of the Site for a new pedestrian route for residents.

- 3.1.13 The new building will be three storeys in height and has been designed to respond to the existing massing and arrangement of buildings on the Site. The top floor of the building is inset to reduce the overall perception of massing of the building and the elevations have various setbacks to respond to its context, break up the building and provide interest.
- 3.1.14 The new building will provide high quality apartments suited to the requirements of future Thamesfield residents. The new building would provide 15no 2-bed units, and 2no 1-bed units. Internally, the units are arranged around central corridors and all apartments have a combined living kitchen dining layout to accommodate modern styles of open plan living. The apartments are designed so that occupants will either have a river view or a courtyard view. The majority of the units have either a segregated terrace space or a balcony providing outdoor amenity space.
- 3.1.15 The materials for the new building have been carefully considered and were subject to detailed discussions with the Council at the pre-application stage. The exterior of the ground and first floor will be pale red brick, with the upper floors in grey ceramic cladding and windows and doors in dark grey powder coated aluminium frame. The red brick has been chosen to pick up materiality cues from the Remenham and Henley Conservation Areas as well as specific buildings/features such as Remenham Row and its southern boundary wall which abuts Thamesfield. The change in material to grey ceramic cladding on the upper floor helps break up the massing and allows this floor to appear as part of the roofscape, making the overall building more recessive in views. It reflects the colour of the roof on Blocks A and B.
- 3.1.16 The building has been carefully designed to minimise the impact on the amenity of neighbours and existing Thamesfield residents. This includes the siting of the building and the position and design of windows and balconies.
- 3.1.17 Proposals also include replacement of the existing single storey extension to the rear of the main house to create improved kitchen and laundry and multifunctional facilities and a new entrance from the courtyard.
- 3.1.18 The proposal would further comprise remodelling the central courtyard, enabling better legibility, circulation and outlook for residents. It is proposed to remove service vehicle access to create a greener, more resident focused space in the centre of the scheme. The landscape strategy for the courtyard includes a woodland walk, kitchen garden and resident's garden.
- 3.1.19 The proposals also include minor alterations to the existing basement, with plant being incorporated into this space.

Landscaping

- 3.1.20 One of the key drivers for the redevelopment of the northern part of Thamesfield has been to improve the spaces in and around the buildings in this part of the Site to enhance circulation and functionality and to provide enhanced outdoor communal spaces for residents.
- 3.1.21 The Landscape Strategy and Illustrative Masterplan provide the full details of the soft and hard landscaping proposals. No trees are proposed to be removed as part of the development. New tree planting is proposed along the southern boundary of the Site as well as the central courtyard. A new woodland walk is proposed along the northern boundary of the Site with places for residents to sit and socialise. The central courtyard will be transformed into a high-quality communal outdoor space with kitchen and residents' gardens either end as well as opportunities for residents to engage in outdoor activity and recreation.
- 3.1.22 The strategy also includes the extension of the existing tarmac surface to the north of the croquet lawn to provide additional car parking in the eastern part of the Site.
- 3.1.23 Overall, the proposed landscaping scheme will enhance the experience of residents and staff who will benefit from additional areas to relax, exercise, socialise and engage in other outdoor activities.

Access and Parking

- 3.1.24 Vehicle and pedestrian access onto the Site will remain as existing, utilising the main entrance from Wargrave Road.
- 3.1.25 Waste and recycling are collected from the bin storage areas by building management and moved to a refuse store area located near the entrance at Wargrave Road. The waste will continue to be collected by a private company as per the existing arrangement. Additional bins will be provided within the existing storage areas to cater for the increase in units.
- 3.1.26 There are currently 31 parking spaces on Site, two of which are disabled bays. These are located to the south of the main building and along the Site's eastern boundary. As a part of the proposal the number of parking spaces within the Site would increase to 39 with four disabled bays. The additional parking areas would be created by expanding and rationalising the layout of the existing parking areas. There will be 8 EV charging spaces.
- 3.1.27 Please refer to the Transport Statement and the DAS for more information in relation to access, parking and servicing.

Housing Mix

- 3.1.28 The proposed scheme provides a net increase of 14no. extra care units. A total of 4no. units will be lost through demolition and reorganisation, and 17 new extra care units will be provided within the extension. There is a gross provision of 17no. extra care units. The application proposes 15no 2-bed units and 2no 1-bed units.
- 3.1.29 It is considered that this is a suitable housing mix which reflects the need and demand for extra care units in Wokingham Borough. The focus on two-bed homes reflects the extra care nature of the development and the supported independent living it affords, providing occupiers with the ability to host guests or carers and the flexibility for couples who may sleep separately.
- 3.1.1 The application does not propose any on site affordable housing as it has been demonstrated through the Financial Viability Assessment that this would not be viable for the Site.
- 3.1.2 The accommodation mix will provide a wide range of extra care dwellings and offer older people a variety of housing choice.

Planning Obligations

- 3.1.3 The development will be liable for Community Infrastructure Levy (CIL) costs. For extra care Accommodation (Use Class C2) within the 'Rest of Borough', Wokingham's CIL Charging Schedule (adopted February 2015) applies an index linked rate of £60 per sqm. This will be secured following the grant of planning permission. A completed CIL form is submitted with this application.
- 3.1.4 The Applicant will seek to agree planning obligations with the Council (under Section 106) to secure contributions necessary to allow the development to be supported.
- 3.1.5 The Applicant will liaise with the Council through the determination of the application to agree the specific Heads of Terms.

Benefits of the Scheme

- 3.1.6 The proposed development would deliver a number of benefits for both Remenham and Henley and the wider area including:
- The proposal would positively contribute towards an identified acute need for this type of housing within the Borough. The Local Housing Needs Assessment (LHNA) (2020) identifies a significant and increasing need for specialist housing with support or care for older people. Additional detail is set out in the Stantec Needs Report submitted as part of the planning application.

- Wide-ranging health and wellbeing benefits to the residents of the scheme in respect of continued independence, opportunities to continue an active lifestyle and avoid social isolation.
- As well as improved quality of life, health and well-being benefits also reduces pressure on the NHS which provides savings to the healthcare economy;
- Specialist housing and care for older people provides additional benefits to the housing market as residents downsize into more efficient smaller dwellings freeing up larger family housing elsewhere in the borough;
- A contribution towards the Council's housing land supply against a context of a five year housing supply of 3.2 years (Base date 1 April 2023);
- Redevelopment of part of a brownfield site to provide additional extra-care accommodation, making an effective use of land to contribute towards housing need, rather than utilising a greenfield site;
- Development in a sustainable location adjacent to existing built form, which is well located for public transport connections and to promote sustainable travel;
- A contribution to the economy through local construction jobs during the construction phase of the development, indirect employment opportunities in the supply chain and ongoing economic benefit through the employment of village staff and spend by residents and staff
- The creation of enhanced and new green infrastructure;
- Robust landscaping and planting proposals throughout the Site to ensure long term succession of landscaping; and
- A biodiversity net gain of 12.22% for habitats (including offsite but within Thamesfield) and 43.66% for hedgerows.

3.1.7 The list is not exhaustive; however, it provides a summary of the principal benefits and opportunities that would result from the proposed development. This is explored in more detail in the Planning Assessment in Section 6.

4 PRE-SUBMISSION CONSULTATION

- 4.1.1 Prior to the preparation and submission of this application, extensive pre-application engagement has been undertaken with WBC Officers, local residents, stakeholders and political representatives of the Council.
- 4.1.2 The engagement process has enabled interested parties to provide comments on the proposed scheme, with extensive opportunities for input both by WBC officers, as well as the local community.

Pre-Application Engagement with Wokingham Borough Council

First Pre-application Submission

- 4.1.3 The Applicant submitted an initial pre-application enquiry on the 19th of October 2022. A site meeting was held on the 11th of November 2022 followed by a meeting with officers on the 22nd of November 2022. The Council's written response was issued on 29th of November 2022.
- 4.1.4 The pre-application submission included a planning cover letter, existing plans, pre-application design report, Flood Risk Assessment, and Transport Technical Note. Indicative floor plans were provided but no detailed proposed elevations were submitted.
- 4.1.5 The Council's pre-application response set out the following key points:
- Principle of additional housing with care units is established by virtue of the existing use of the Site as a Retirement Village
 - Proposal would not comply with paragraph 149 (g) of the NPPF, as the proposal would have a greater impact upon the openness of the Green Belt than the existing single storey extension. It would therefore be inappropriate development in the Green Belt.
 - References policy CP12 of the Core Strategy and TB01 of the MDD which are Green Belt Policies. References supporting text which states that alterations or extensions to dwellings should be limited in scale to no more than 35% in volume over and above the original building.
 - Refers to policy CP11 which relates to proposals outside development limits and states that the proposals would not comply with this policy.
 - As the units are C2, the requirement for affordable housing is not triggered.
 - The new building will be harmful to the character and appearance of the area, due to the uplift of built form, massing and scale and being visually dominant.
 - No meaningful impact to the character and appearance of the conservation area in which the site lies or the setting of the closest listed buildings.

- Potential impacts on neighbouring amenity would need to be assessed in detail – potential impacts on Remenham Row and existing buildings on the Site identified. Sunlight/daylight study will be required.
- Flood Risk Assessment will be required and should include details such as information about existing drainage and an appropriate drainage strategy. Flood resilience measures should be incorporated into the design.
- Arboricultural Impact Assessment will be required to detail tree protection measures.
- Landscape Strategy will be required to show soft and hard landscaping including outdoor furniture, tree planting.
- Ecological Assessment, Bat surveys and Biodiversity Net Gain Reporting will be required.
- Building sustainability details should form part of the Design and Access Statement/Planning Statement.
- Location of bin storage (waste, recycling, green waste, compost) should be shown on the site plan.

4.1.6 The response also included a list of plans and documents required to accompany the planning application.

4.1.7 A separate Highways pre-application response was received which set out the following key points:

- Visibility splays information will be required due to the anticipated intensification of the existing site access.
- Vehicular and cycle parking is to be provided in accordance with the WBC Parking Standards.
- Parking plan to be provided to show parking area for service/delivery vehicles and EV charging spaces.
- Information about refuse collection procedure and size of the refuse collection vehicles required.

Second Pre-application Submission

4.1.8 On the 15th of May 2023 the Applicant submitted a follow up pre-application request. The information submitted sought to address some of the points made in the Council's November 2022 Written Pre-application Response. It also provided more detail in terms of design and landscape and visual impacts.

4.1.9 An assessment of landscape and visual amenity and Green Belt matters was submitted as part of the pre-application submission. This identified that the proposals would sit within a developed

area enclosed by other buildings and vegetation and as a result the impact on views, openness of the Green Belt and the functioning of the Green Belt would be very limited.

4.1.10 A meeting with planning, landscape and sustainability officers was held at the WBC offices on the 27th of June 2023. Interim written responses were received from landscape and heritage officers. Following this meeting and the initial WBC consultee responses, additional information was submitted including more detailed assessment of particular views and a materials options study. A follow up meeting was held on the 15th of August 2023 with planning, landscape and heritage officers.

4.1.11 The written pre-application response was received on the 21st of September 2023.

4.1.12 The main points can be summarised as follows:

- **Countryside location** –the development proposal is unlikely to undermine the fundamental objectives of the policy CP11 (Proposals Outside Development Limits).
- **Green Belt** –the proposal would be inappropriate development in the Green Belt. No commentary as to whether paragraph 149 (g) had been considered was provided.
- **Green Belt** – the factors included in the pre-application submission could amount to Very Special Circumstances and robust justification for these factors will be required in the planning application.
- **Need for specialist accommodation** – acknowledges the various planning policies which are supportive of the provision of residential accommodation for older people. It goes on to state that the Council's Adult Services Commissioning Team are best placed to advise on the current need for care home accommodation.
- **Housing Land Supply** – confirms the housing land supply position of 3.95 years (at the time of the response) and that the presumption in favour of sustainable development would be engaged.
- **Sustainable Development** – the proposal will contribute to the economic, social and environmental objectives set out in the NPPF.
- **Character of the Area including Heritage** – no explicit conclusion in terms of the degree of harm or otherwise to heritage assets. Some concerns raised in terms of impacts on views and the modern built form. Response indicates that the external treatment and detailing may contribute positively to its overall appearance.
- **Neighbouring amenity** – No concerns raised with regards to overlooking. Indicates that the new building would have a **perceived** overbearing/dominant effect on Remenham Row (our emphasis).
- **Highways** – Existing access and proposed parking is sufficient in line with submitted technical note. Detail needed on staffing increases. Parking management plan required. Cycle storage required.

- **Flooding/drainage** – no issues raised, general advice provided on application requirements.
- **Landscaping and Trees** - Arboricultural Impact Assessment will be required. Supportive of the overall landscape strategy. States that the submitted viewpoints agreed, and views 4 and 5 should be rendered. States that ‘the presentation clearly showed a minimal visual impact from the proposed extension’ in relation to views 4 and 5. No landscape/visual impact objections are raised.
- **Ecology** – no response from ecology officer – general advice provided in line with previous pre-app response.
- **Sustainability** - Council's Sustainability Officer has commented the overall sustainability strategy submitted is suitable. The Sustainability Officer was very supportive of the approach at the pre-application meeting.
- **Waste** – location of bin storage should be shown - as per previous response.

4.1.13 The overall summary set out in the September 2023 pre-application response is as follows:

“The proposal would introduce a three-storey extension within Countryside and Green Belt. However as discussed at the pre application meetings, the special circumstances of the proposal could outweigh the harm to Green Belt and robust justification is to be provided within any full application.

The proposal has the potential to deliver an acceptable development on heritage grounds”.

Engagement with Stakeholders and Local Community

- 4.1.14 A Statement of Community Engagement has been prepared by Camargue which sets out the pre-application community engagement undertaken by the Applicant. A summary of the engagement in relation to the local community is set out below.
- 4.1.15 RVG proactively sought to consult relevant community stakeholders and organisations, including political representatives, residents, and resident associations, to ensure that its application took the views of local people into account.
- 4.1.16 A public consultation event was held on 16th October 2024. The first part of the event was for residents of Thamesfield and the second part was for local residents and other stakeholders. Publicity for the event took place through letter, emails and flyers sent to local residents and businesses within a certain radius of the site and direct invitations sent to relevant WBC cabinet members, Ward members, Chair of the Parish Council, the local Member of Parliament. A bespoke website for the event was also created to provide information on the proposals and on

the consultation event. An email address and telephone number were provided to enable questions about the proposals to be submitted. A summary

- 4.1.17 The event was well attended by both Thamesfield residents and local residents and other stakeholders, despite some acknowledged issues with the delivery of the invitation to the event. Attendees provided feedback both to members of the team during the event and through the submission of written feedback forms. The Statement of Community Engagement sets out RVG's response to the feedback received.

Summary

- 4.1.18 The Applicant has undertaken consultation and engagement with residents and stakeholders on the proposals since 2022. All comments and suggestions that have been received throughout the process have been read, analysed and shared amongst the team, with changes made to the development to reflect the feedback provided, where possible and appropriate. The proposal subject of this planning application has therefore been fully informed by the consultation process.

5 PLANNING POLICY CONTEXT

5.1.1 This Section sets out the national and local planning policy framework relevant to the Site and proposed development.

5.2 National Planning Policy Guidance

National Planning Policy Framework

5.2.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. It is a material consideration in all planning decisions. It was originally published on 27th March 2012, however, has since been subsequently updated in 2018, 2019, 2021 and 2023. The most recent version was published on the 19th of December 2023.

5.2.2 The Government recently ran a consultation on proposed changes to the NPPF along with other national planning policy reforms. The consultation took place from the 30th of July 2024 to the 24th of September 2024. The Applicant reserves the right to provide an updated planning statement following the publication of the new NPPF.

5.2.3 For dealing with planning applications, the policies in the Framework are applied from the date of publication. Therefore, the policies in the December 2023 version of the NPPF will be applied until any new version is published.

5.2.4 Chapters of the NPPF that are of most relevance to the application include:

- Chapter 2 - Achieving sustainable development
- Chapter 4 - Decision-making
- Chapter 5 - Delivering a sufficient supply of homes
- Chapter 6 - Building a strong, competitive economy
- Chapter 8 - Promoting healthy and safe communities
- Chapter 9 - Promoting sustainable transport
- Chapter 11 - Making effective use of land
- Chapter 12 - Achieving well-designed places
- Chapter 13 - Protecting the Green Belt
- Chapter 14 - Meeting the Challenge of Climate Change, Flooding and Coastal Change
- Chapter 15 - Conserving and enhancing the natural environment
- Chapter 16 - Conserving and enhancing the historic environment

5.2.5 The key paragraphs of the NPPF relevant to the Site and submitted proposals are as follows:

5.2.6 Paragraph 2 of the Framework states that applications for planning permission should be determined in accordance with the development plan, unless material considerations indicate otherwise.

5.2.7 The NPPF defines older people as:

“People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.”

5.2.8 Paragraph 60 emphasises the Government’s objective of “significantly boosting” the supply of housing. It states that “it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”.

5.2.9 Paragraph 63 of the NPPF requires LPAs to consider, inter alia:

“....the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing, families with children, older people (including those who require retirement housing, housing-with-care and care homes); students, people with disabilities,”

5.2.10 Paragraph 85 states planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

5.2.11 Paragraph 96 sets out planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

5.2.12 Paragraph 97 requires policies to provide the social, recreational and cultural facilities and services the community need. Planning policies and decisions should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

- 5.2.13 Paragraph 123 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 5.2.14 Paragraph 143 sets out the five purposes of the Green Belt, including: check the unrestricted sprawl of large built-up areas; prevent neighbouring towns merging; safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- 5.2.15 Paragraph 152 considers inappropriate development, is by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 5.2.16 Paragraph 153 requires that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very Special Circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 5.2.17 Paragraph 154 provides a list of exceptions to inappropriate development in the Green Belt including:

“g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or**
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”**

- 5.2.18 Section 6 (Planning Assessment) will review compliance with the NPPF in further detail.

Draft NPPF consultation (July 2024)

- 5.2.19 The Draft National Planning Policy Framework (NPPF) consultation began on July 30, 2024, and concluded on September 24, 2024. This consultation sought public feedback on proposed revisions to the NPPF aimed at promoting sustainable growth and supporting economic development, against a context of a desire to significantly increase the development of new housing. Among the significant updates, the draft NPPF proposes changes to Green Belt policies. Notably, it proposes the identification of “grey belt” land within the Green Belt. The

“grey belt” is a concept introduced to identify low-performing, underutilised sections within the Green Belt that do not significantly contribute to its core purposes. These areas are defined as previously developed land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes. The consultation text is explicit at Chapter 5, paragraph 2 that “To deliver the homes and commercial development this country needs, we are proposing the targeted release of grey belt land”.

5.2.20 Paragraph 151 of the draft proposed NPPF contains some changes with regards to the list of circumstances where development in the Green Belt is considered to be appropriate.

5.2.21 Paragraph 151 of the proposed draft NPPF states:

“A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt:
 - ~~— not have a greater impact on the openness of the Green Belt than the existing development; or~~
 - ~~— not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”~~

5.2.22 The proposed NPPF text allows for development on grey belt land in situations where local planning authorities cannot demonstrate a five-year housing land supply or are delivering less than 75% against the housing delivery test. The proposed text sets out that development is not considered inappropriate in the Green Belt if it meets certain criteria. Draft paragraph 152 of the draft NPPF states:

“In addition to the above, housing, commercial and other development in the Green Belt should not be regarded as inappropriate where:

- a) The development would utilise grey belt land in sustainable locations, the contributions set out in paragraph 155 below are provided, and the development would not fundamentally undermine the function of the Green Belt across the area of the plan as a whole; and**
- b) The local planning authority cannot demonstrate a five year supply of deliverable housing sites (with a buffer, if applicable, as set out in paragraph 76) or where the Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years; or there is a demonstrable need for land to be released for development of local, regional or national importance.**
- c) Development is able to meet the planning policy requirements set out in paragraph 155.”**

5.2.23 Paragraph 155 of the proposed draft NPPF states:

“Where major development takes place on land which has been released from the Green Belt through plan preparation or review, or on sites in the Green Belt permitted through development management, the following contributions should be made:

- a. In the case of schemes involving the provision of housing, at least 50% affordable housing [with an appropriate proportion being Social Rent], subject to viability;**
- b. Necessary improvements to local or national infrastructure; and**

c. The provision of new, or improvements to existing, green spaces that are accessible to the public. Where residential development is involved, the objective should be for new residents to be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.”

Planning Practice Guidance (NPPG)

5.2.24 The PPG was published on 6th March 2014 and, alongside the NPPF, provides guidance notes on various matters including Housing for Older and Disabled People; Air Quality; Design; Effective Use of Land; Historic Environment; Natural Environment; Renewable and Low Carbon Energy; Travel Plans, Transport Assessments and Statements; Noise; Flooding and Climate Change.

5.2.25 Following the changed requirements of the NPPF (para 61), the PPG was significantly expanded upon through updates in June and July 2019. These changes update the guidance on “Housing and Economic Needs Assessment” and introduce two new sections to the PPG:

- Housing Needs of Different Groups.
- Housing for Older and Disabled People.

5.2.26 The key extracts of the NPPG relevant to the Site and submitted proposals are as follows:

5.2.27 The “Housing for Older and Disabled People” provides much expanded guidance pertinent to this application. Under the subheading “*Why is it important to plan for housing needs of older people?*” it advises:

“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.”

[Para 001 Ref ID: 63-001-20190626]

5.2.28 Under the subheading “What are the different types of specialist housing for older people?” it states:

“There are different types of specialist housing designed to meet the diverse needs of older people, which can include:

Extra care housing or housing-with-care: This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24-hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.”

[Para 010 Ref ID: 63-010-20190626] [emphasis added]

5.2.29 Finally, relevant to this application, the PPG emphasises that:

“Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need.”

[Para 016 Ref ID: 63-016-20190626]

5.2.30 The fact that the needs of the elderly can no longer be dealt with under the PPG’s general advice on calculating need, in addition to the special regard had in both the NPPF and PPG to ensuring Councils meet the housing needs of the elderly, is highly significant. This provides a clear indication that this is a critical issue for Central Government and therefore for decision taking, such as in the case of this application.

National Design Guide (MHCLG, 2019)

5.2.31 The National Design Guide (2019) illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. The guide sets out that well-designed buildings provide high quality environments for their users, relate positively to the spaces around

them and resolve the details of operation and servicing so that they are well-integrated into their surroundings.

5.3 Local Planning Policy

5.3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that where the Development Plan contains relevant policies, applications for development which are in accordance with the plans should be allowed unless other material considerations indicate otherwise.

5.3.2 The relevant local planning policy framework for this application includes;

- The Wokingham Borough Core Strategy (January 2010);
- The Managing Development Delivery Local Plan Document (February 2014);
- Central and Eastern Berkshire - Joint Minerals & Waste Plan (January 2023);
- The Regional Strategy Policy NRM6 (Thames Basin Heaths Special Protection Area) of the South East Plan Regional Strategy (2009); and
- Made Neighbourhood Plans.

Wokingham Borough Core Strategy (January 2010) (CS)

5.3.3 The Wokingham Borough Core Strategy (CS) (January 2010) is the document that sets out the vision of how the borough will develop in the period to 2026 and how the Council aims to protect and enhance the good quality of life enjoyed in the Borough. The relevant policies are listed below:

- Policy CP1 – Sustainable Development
- Policy CP2 – Inclusive Communities
- Policy CP3 – General Principles for Development
- Policy CP4 – Infrastructure Requirements
- Policy CP5 – Housing Mix, Density and Affordability
- Policy CP6 – Managing Travel Demand
- Policy CP7 – Biodiversity
- Policy CP9 – Scale and Location of Development Proposals
- Policy CP11 – Proposals Outside Development Limits (Including Countryside)
- Policy CP12 – Green Belt
- Policy CP17 - Housing delivery

5.3.4 The key policies of the Local Plan relevant to the Site and submitted proposals are as follows:

5.3.5 **Policy CP2 ‘Inclusive Communities’** sets out that to ensure that new development contributes to the provision of sustainable and inclusive communities to meet long term needs, planning permission will be granted for proposals that address the requirements of certain identified groups. This includes “an ageing population, particularly in terms of housing, health and wellbeing”.

5.3.6 **Policy CP5 ‘Housing Mix, Density and Affordability’** seeks to ensure that development provides a mix and balance of densities, dwelling types, tenures and sizes. It also sets out affordable housing thresholds and requirements for residential development. It indicates that outside of development locations, proposals for residential development of 5 or more dwellings (net) or covering a net site area of at least 0.16ha will be required to provide up to 50% of the net additional units proposed as affordable housing, subject to viability.

5.3.7 **Policy CP11 ‘Proposals Outside Development Limits’** states that:

“In order to protect the separate identity of settlements and maintain the quality of the environment, proposals outside of development limits will not normally be permitted except where:

1) It contributes to diverse and sustainable rural enterprises within the borough, or in the case of other countryside based enterprises and activities, it contributes and/or promotes recreation in, and enjoyment of, the countryside; and

2) It does not lead to excessive encroachment or expansion of development away from the original buildings; and

3) It is contained within suitably located buildings which are appropriate for conversion, or in the case of replacement buildings would bring about environmental improvement; or

4) In the case of residential extensions, does not result in inappropriate increases in the scale, form or footprint of the original building;

5) In the case of replacement dwellings the proposal must:

i) Bring about environmental improvements; or

ii) Not result in inappropriate increases in the scale, form or footprint of the original building.

6) Essential community facilities cannot be accommodated within development limits or through the re-use/replacement of an existing building;

7) Affordable housing on rural exception sites in line with CP9.”

5.3.8 **Policy CP12 ‘Green Belt’** states that planning permission will not be granted for inappropriate development within the Metropolitan Green Belt.

5.3.9 **Policy CP17 ‘Housing delivery’** seeks to provide for the development of at least 13,230 dwellings and associated development and infrastructure in the Borough in the period 2006-2026. It sets out how the housing requirement will be met through a mixture of allocations and existing commitments/completions.

The Managing Development Delivery Local Plan Document (February 2014) (MDD)

5.3.10 The Managing Development Delivery Local Plan (MDD) adds extra detail to the policies within the Core Strategy. Together, these two documents set out how the Borough will develop up until 2026 making it an excellent place to live, work and play. The relevant policies are listed below:

- Policy CC01 – Presumption in Favour of Sustainable Development
- Policy CC02 – Development Limits
- Policy CC03 – Green Infrastructure, Trees and Landscaping
- Policy CC04 – Sustainable Design and Construction
- Policy CC05 – Renewable Energy and Decentralised Energy Networks
- Policy CC06 - Noise
- Policy CC07 - Parking
- Policy CC09 – Development and Flood Risk (from all sources)
- Policy CC10 – Sustainable Drainage
- Policy TB01 – Development within the Green Belt
- Policy TB05: Housing Mix
- Policy TB07 – Internal Space Standards
- Policy TB09 – Residential accommodation for vulnerable groups
- Policy TB21 – Landscape Character
- Policy TB23 – Biodiversity and Development
- Policy TB24 – Designated Heritage Assets (Listed Buildings, Historic Parks and Gardens, Scheduled Ancient Monuments and Conservation Areas)

5.3.11 The key policies of the Local Plan relevant to the Site and submitted proposals are as follows:

5.3.12 **Policy CC09 ‘Development and Flood Risk’** seeks to ensure that development proposals take into account all sources of flood risk and avoids inappropriate development in areas at risk of flood risk as per the requirements of the NPPF, and technical guidance. It also sets out when a Flood Risk Assessment will be required.

- 5.3.13 **Policy TB01 ‘Development within the Green Belt’** sets out that development for the purposes set out in paragraphs 89 and 90 of the National Planning Policy Framework (2012) and as stated at point 3 will only be permitted where they maintain the openness of, and do not conflict with the purposes of including land in, the Green Belt. Point 3 sets out that the alteration and/or extension of a dwelling and the construction, alteration or extension of buildings ancillary to a dwelling in the Green Belt over and above the size of the original building(s) shall be limited in scale.
- 5.3.14 **Policy TB05 ‘Housing Mix’** seeks to ensure that residential development provides for an appropriate housing mix which reflects a balance between the character of the area and the current and projected needs of households.
- 5.3.15 **Policy TB09 ‘Residential accommodation for vulnerable groups’** states that the Council will in principle support proposals which provide for the certain types of accommodation to provide for peoples’ needs over a lifetime, including extra care homes and proposals that allow the elderly and those with disabilities to remain in their own homes or purpose built accommodation.
- 5.3.16 **Policy TB21 ‘Landscape Character’** specifies that proposals must demonstrate how they have addressed the requirements of the Council’s Landscape Character Assessment, and shall retain or enhance the condition, character and features that contribute to the landscape.
- 5.3.17 **Policy TB24 ‘Designated Heritage Assets’** states that the Council will conserve and seek the enhancement of designated heritage assets in the Borough and their settings.

5.4 Supplementary Planning Documents

- 5.4.1 Wokingham Borough Council has several adopted Supplementary Documents (SPDs). The relevant SPDs are set out below.

Borough Design Guide (2012)

- 5.4.2 The overall aim of this document is to enhance the quality of development and make sure proposals are of the highest quality of design. That means inclusive, safe, harmonious, welcoming, sustainable places that are well-related to the surroundings.

Sustainable Design and Construction SPD (2010) and its Companion to Sustainable Design and Construction SPD document (2010)

- 5.4.3 This SPD provides guidance to help improve the sustainability performance of buildings and spaces through their design and subsequent use. It aims to enhance certainty and transparency of expectations to applicants and thereby secure the best planning outcome. Planning

applications need to show that proposed development meets the requirements of the SPD and regional and national mandatory sustainable development requirements.

- 5.4.4 The Companion to Sustainable Design and Construction SPD document (2010) relates to South East Plan policy NRM11 and as such is no longer relevant.
- 5.4.5 The Sustainable Design and Construction SPD was not listed within the written pre-app responses. The SPD is increasingly out of date and as such, we do not consider this SPD as a material consideration in the context of this application. Notwithstanding this, the Applicant recognises the importance of sustainability and a sustainability report accompanies this application.

Affordable Housing SPD

- 5.4.6 The purpose of this document is to provide additional guidance in line with Core Strategy Policy CP5 which relates to affordable housing. Paragraph 5.4 of this SPD states that, any application for dwellings exceeding the thresholds in Policy CP5, including self-contained older people's housing (such as extra care housing), will need to deliver affordable housing in line with the approach in the Core Strategy. Footnote 2 defines self-contained accommodation as having kitchen, living area, bedroom and bathroom available for the exclusive use of its occupants.
- 5.4.7 The Affordable Housing SPD was not listed within the written pre-app responses. The SPD is increasingly out of date and as such, we do not consider this SPD as a material consideration in the context of this application.

5.5 Emerging Local Planning Policy

Local Plan Update

- 5.5.1 WBC is preparing a new Local Plan known as the Local Plan Update (LPU). In February – April 2020, the Council consulted on a Draft version of the Plan, followed by a Revised Growth Strategy consultation in November 2021 – January 2022.
- 5.5.2 On 30th September 2024, WBC commenced a regulation 19 consultation on its Proposed Submission Plan. The consultation ran until 13th November 2024. The Local Plan Update is expected to be submitted for examination in December 2024/January 2025 and adoption anticipated in May 2026 (Local Development Scheme, September 2024).
- 5.5.3 The Proposed Submission Plan sets out the planning policies proposed to manage development across the borough to 2040. Objective 9 sets out that the Council will “contribute our fair share towards meeting the need for more housing, ensuring that a range of suitable housing options are available across both towns and villages which cater for and adapt to a variety of needs

including affordable housing and the growing ageing and those with additional care and support needs”.

- 5.5.4 The Draft Plan published in 2020 contains draft policy H7: Specialist Accommodation which states:

“Development proposals related to specialist accommodation (including housing with care or housing with support) will be supported where the following criteria are met:

- a) Local commissioning priorities or a local need has been evidenced through a specific survey / assessment using a methodology agreed with the council;**
- b) The accommodation is well located with regard to the type of accommodation being proposed. Locations within and close to an identified town or district centre are considered suitable in principle for all types of accommodation;**
- c) The site has access to a good range of services and facilities, including existing public transport routes, or incorporates essential community facilities and services, such as healthcare services or day care for older people;**
- d) The site has safe and suitable access to the highway network for vehicles and pedestrians and adequate space can be provided for emergency vehicles; and**
- e) Incorporate gardens and areas of amenity green space of an appropriate size and quality as an integral part of the development proposal.”**

- 5.5.5 The supporting text, at paragraph 9.79 states:

“The Local Housing Need Assessment (LHNA) has assessed the likely level of need for bedspaces for older people (within use class C2), based on projections of how many people are likely to suffer from issues such as reduced mobility and dementia. It identifies an indicative need to plan for around 925 housing places over the period 2021-2040 to be provided through a mix of sheltered and extra care housing and domiciliary care to accommodate people with specific requirements, such as the older population and vulnerable people, including people with disabilities.”

5.5.6 Below is a list of relevant draft policies from the draft version of the Plan. Due to the stage at which of the Plan is at, these draft policies are considered to have limited weight with regard to these proposals.

- Policy SS1: Sustainable Development Principles
- Policy SS2: Spatial Strategy and Settlement Hierarchy
- Policy SS5: Development in the Countryside
- Policy SS6: Development in the Green Belt
- Policy SS10: Meeting our Housing Needs
- Policy SS15: Securing Infrastructure
- Policy SS17: Transport Improvements
- Policy CE1: Design Principles for Efficient Buildings
- Policy CE3: Environmental Standards for Residential Development
- Policy CE4: Supporting a Circular Economy
- Policy CE5: Embodied Carbon
- Policy C1: Active and Sustainable Transport and Accessibility
- Policy C2: Mitigation of Transport Impacts and Highways Safety and Design
- Policy C5: Parking and Electric Vehicle Charging
- Policy C7: Digital Infrastructure and Communications Technology
- Policy C8: Utilities
- Policy ER4: Employment and Skills Plan
- Policy H1: Housing Mix, Density and Standards
- Policy H7: Specialist Accommodation
- Policy FD1: Development and Flood Risk (from all sources)
- Policy FD2: Sustainable Drainage
- Policy FD3: River Corridors and Watercourses
- Policy NE1: Biodiversity and Geodiversity
- Policy NE2: Biodiversity Net Gain
- Policy NE4: Trees, Woodland Hedges and Hedgerows
- Policy NE5: Landscape and Design
- Policy DH1: Place Making and Quality Design
- Policy DH2: Safeguarding Amenity
- Policy DH6: Archaeology
- Policy HC1: Promoting Healthy Communities
- Policy HC4: Open Space, Sports, Recreation and Play Facilities
- Policy HC5: Environmental Protection
- Policy HC6: Air Pollution and Air Quality
- Policy HC7: Light Pollution

- Policy HC8: Noise Pollution
- Policy HC10: Odour, Fumes and Dust

Evidence Base to the Emerging Local Plan

Local Housing Needs Assessment (LHNA) (2023)

- 5.5.7 The Local Housing Needs Assessment (LHNA) (2023) formed part of the evidence base of the Proposed Submission Plan consultation. The assessment was commissioned with the purpose of identifying the size, type and tenure of homes that will be needed in the future, and the housing needs of different groups within the Borough.
- 5.5.8 Section 7 of the report is dedicated to the needs of different groups, including housing for older people. The LHNA recognises that the population in older age groups within WBC is expected to increase.
- 5.5.9 Paragraph 7.63 of this section of the report states:

“In conclusion, based mainly on the projected increase in the older population, Wokingham Borough Council would be justified in considering planning for a total of around 925 supported housing places over the period 2021-2040, provided through a mix of sheltered and extra care dwellings and domiciliary care to minimise the number of people who need to move to sheltered and extra care.”

5.6 Other Relevant Documents

Wokingham CIL Charging Schedule (February 2015)

- 5.6.1 The Wokingham Borough Council Community Infrastructure Levy (CIL) Charging Schedule was adopted on 19 February 2015. For extra care Accommodation (Use Class C2) within the ‘Rest of Borough’, the Charging Schedule (adopted February 2015) applies an index linked rate of £60 per sqm.

Climate Change Interim Policy Position Statement

- 5.6.2 The Interim Planning Policy Position Statement sets out the position of the Council on the issue of climate change when assessing planning applications. The Statement is not in itself planning policy and is not part of the statutory Development Plan. It is an explanatory document, emphasising that the Climate Emergency is a key material consideration when assessing planning applications.

6 PLANNING CONSIDERATIONS

6.1.1 This Section outlines our assessment of the proposed development against the planning policy context identified in Section 5. Reference is made to the findings of technical reports submitted to accompany the Planning Application in order to avoid unnecessary repetition.

6.2 Decision-Making Approach

6.0 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), the Development Plan is the starting point for the determination of planning applications. Determination is required to be in accordance with the Plan unless material considerations indicate otherwise.

6.1 As outlined at paragraph 5.13, the Development Plan for this application comprises:

- i. The Wokingham Borough Core Strategy (January 2010);
- ii. The Managing Development Delivery Local Plan Document (February 2014);
- iii. Central and Eastern Berkshire - Joint Minerals & Waste Plan (January 2023);
- iv. The Regional Strategy Policy NRM6 (Thames Basin Heaths Special Protection Area) of the South East Plan Regional Strategy (2009);
- v. Made Neighbourhood Plans

6.2 For this application, the relevant Development Plan policies are included within the following documents:

- The Wokingham Borough Core Strategy (January 2010);
- The Managing Development Delivery Local Plan Document (February 2014);

6.2.1 Given the Development Plan document are over 10 years old, the NPPF, and PPG are important material considerations in the overall decision-making process. In particular “the presumption in favour of sustainable development” (explored further below).

6.2.2 The NPPF (paragraph 38) identifies that decisions on proposed development should be approached in a positive and creative way. Paragraph 47 emphasises application should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

6.2.3 The application proposals are assessed against the relevant policies of the adopted Development Plan, as identified in Section 5, below.

6.3 Principle of Development

6.3.1 Paragraph 11 of the NPPF sets a presumption in favour of sustainable development. For decision-taking, this means:

“c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i) The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

6.3.2 The Wokingham Borough Core Strategy (CS) set out the spatial strategy to deliver the necessary development for the Borough up to 2026. It sets out general principles for development, housing and employment needs, and strategic development locations (Arborfield Garrison, South of M4, North Wokingham and South Wokingham). The Managing Development Delivery Local Plan (MDD) adds extra detail to the policies within the Core Strategy, contains additional residential allocations and includes the more detailed development management planning policies for the Borough.

6.3.3 Policy CP9 of the CS – ‘Scale and location of development proposals’ sets out that development will be permitted within the development limits of the major, modest and limited development locations identified within the policy as well as the boundary of the Science Park proposed under policy CP16.

6.3.4 Remenham is not identified as a development location through policy CP9, and the Site is therefore categorised as outside development limits, or open countryside for planning policy purposes. Policy CP11 of the CS sets out the instances where development outside the development limits can be acceptable as set out in section 5 above.

6.3.5 While it is acknowledged that the proposed development does not fall precisely into one of the categories listed under policy CP11, it is considered that it aligns with the principles of this policy. It seeks to restrict development outside of development limits in order to protect the separate

identity of settlements and the quality of the environment, but also to avoid increased use of the private car.

- 6.3.6 Remenham is a small village which contains residential development, Thamesfield Retirement Village, Remenham Row Retirement properties and several recreational/community facilities such as the Little Angel public house, Henley Cricket Club, the Eyot Centre, the Leander Club, as well as several boathouses and boatyards. It is opposite the Market Town of Henley-on-Thames which is identified within South Oxfordshire's Development Plan as a 'Market Town' which has the ability to support the most sustainable patterns of living within South Oxfordshire through their current levels of facilities, services and employment opportunities. The Site is a short distance (c. 300m) from Henley Bridge which can be used to cross the River into Henley to access the facilities and services there. As set out in the Transport Assessment, it is viable to walk or cycle into Henley, and the train station with services to London/Reading via Twyford is approximately 1km away. The Site itself also offers several on site services to residents such as a dining room, bar lounge, and hairdressers. It is therefore considered that the Site is in a sustainable location.
- 6.3.7 The proposed development comprises the partial redevelopment of an existing brownfield Site through the demolition of an existing building and replacement with a new building that forms an extension to Block B. The new building is sited on the footprint of Block C which is to be demolished and is set further into the Site so will not extend the envelope of built form outside the current group of buildings. It will lie to the rear (east) of Blocks A and B, west of Block D and north of Blocks A and E forming the northern wing of the courtyard as Block C does currently. The footprint of the new building is similar to the building to be demolished with only a slight increase in footprint proposed. The new building will be three storeys, and will be slightly taller in height than the existing Block B, but is set back behind the principal buildings on the Site – Blocks A and B, thus retaining their prominence on the key River Thames elevation. The building is considered to sit comfortably on the Site and is an appropriately sized extension in relation to the existing buildings on the Site. The proposal is on a previously developed site, will not extend development further into the open countryside, and is of an appropriate scale. It will also offer environmental improvements including the provision of renewable technologies, a brown roof, improved landscaping and high sustainability credentials. It is therefore considered to be in accordance with the principles and aims of policy CP11.
- 6.3.8 Policy CP2 (a) of the CS sets out that planning permission will be granted for proposals that address the requirements of an ageing population. Policy TB09 of the MDD sets out that the Council will in principle support proposals which provide for extra care homes and proposals that allow the elderly and those with disabilities to remain in their own homes or purpose built accommodation. These policies therefore weigh in favour of the proposal.

- 6.3.9 The Site is currently in use as a retirement village with extra care units. The Certificates of Lawfulness granted by the Council in 2022 establish that the lawful use of the Site is Extra Care (use class C2). The use class of the Site has been established and the proposal for additional extra care units to enhance the vitality and viability of this established retirement village is acceptable. The provision of the extra care units is in accordance with policies CP2 and TB09 which both support the provision of specialist accommodation for the ageing population.

Green Belt

- 6.3.10 The Site is located within the Metropolitan Green Belt, where development is subject to both national and local Green Belt policies. This is a key 'in principle' planning consideration.
- 6.3.11 Policy CP12 of the CS states that:

“Planning permission will not be granted for inappropriate development within the Metropolitan Green Belt as defined in PPG2.

The Metropolitan Green Belt in the borough as illustrated on the key diagram comprises the land north and east of Twyford but excluding Wargrave. It also includes the land in the parish of St. Nicholas Hurst east of The Straight Mile and north of Carter's Hill.”

- 6.3.12 The reference to PPG2 is now out of date. Policy TB01 of the MDD states:

“1. The Green Belt is defined on the Policies Map.

2. Within the Green Belt, development for the purposes set out in paragraphs 89 and 90 of the National Planning Policy Framework* and as set out in point 3 below will only be permitted where they maintain the openness of, and do not conflict with the purposes of including land in, the Green Belt.

3. The alteration and/or extension of a dwelling and the construction, alteration or extension of buildings ancillary to a dwelling in the Green Belt over and above the size of the original building(s) shall be limited in scale.”

- 6.3.13 The NPPF paragraph number references in policy TB01 are now out of date and have been superseded by paragraphs 154 and 155 of the 2023 NPPF. Applications for development within the Green Belt will therefore be determined in accordance with national planning policy.

- 6.3.14 Paragraph 142 states that the fundamental aim of the Green Belt policy is to:

“Prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.

6.3.15 Paragraph 143 sets out the five purposes of the Green Belt:

**“1. To check the unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns merging into one another;
3. To assist in safeguarding the countryside from encroachment;
4. To preserve the setting and special character of historic towns; and
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”**

6.3 The Landscape and Visual Appraisal and Green Belt Assessment (LVIA) prepared by Turley assesses the Site against the five purposes of the Green Belt. The overall conclusion of this assessment is that due to its low level of openness, previously developed character and relationship with existing settlement, at the local level the Site makes only a limited contribution to Green Belt purposes 1 – 5. The proposed development is found to result in no material change to the contribution of the Site to the purposes of the Green Belt and would not harm the character of this part of the Green Belt.

6.4 Paragraph 152 of the NPPF sets out that “inappropriate development” is, by definition, harmful to the Green Belt and as such should not be approved except in “very special circumstances” (VSCs). Paragraph 153 advises that VSCs will not exist unless the potential harm is clearly outweighed by other considerations.

6.5 National policy provides a list of the exceptions which should not be considered ‘inappropriate development’ within the Green Belt (Paragraph 154) and to which the requirement to demonstrate VSCs therefore does not apply. “Exception 154 (g) states:

“g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or**
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified**

affordable housing need within the area of the local planning authority.”

- 6.3.16 The proposed development comprises the demolition of an existing building on a brownfield site, and replacement with another building which will form an extension to Block B. The replacement building will be situated amongst other buildings on the Site. It therefore comprises the partial redevelopment of previously developed land (the northern part of the Thamesfield Retirement Village – the Application Site) which itself sits within built development in Remenham village.
- 6.3.17 As such, the Council must consider whether the proposal would have a greater impact on the openness of the Green Belt than the existing development.
- 6.3.18 The concept of ‘openness’ is set out within the PPG (Reference ID: 64-001-20190722) with the following matters to be taken into account:

**“- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.”**

- 6.3.19 These considerations are addressed in turn below.

Visual ‘Openness’

- 6.3.20 The LVIA provides a detailed analysis of the existing openness of the Application Site and its current contribution to openness and an assessment of the impact of the proposed development on the openness of the Green Belt. The Site contains a tight cluster of buildings grouped in the northern part of the Site and Thamesfield Lodge which sits slightly removed. The Site is set within the village of Remenham, surrounded by built form including Remenham Row tight against its northern boundary, residential properties to the east and the Eyot Centre to the south.
- 6.3.21 In terms of physical openness, paragraph 6.13 of the LVIA states:

“due to the presence of existing development, the existing physical openness of the Site and surrounding area are very low and the contribution of these areas to the openness of the Green Belt is therefore also very low.”

- 6.3.22 The LVIA assesses the visual openness of the Site in paragraph 6.15-6.17. It concludes that the visual openness of this part of the Green Belt is low due to built form and mature vegetation restricting visibility or foreshortening views.
- 6.3.23 Following an assessment of the impacts of the proposed development on the landscape character and landscape receptors and visual receptors and representative views, the LVIA provides an assessment of the impact of the proposed development on the openness of the Green Belt.
- 6.3.24 The proposals include the removal of Block C, which would result in a slight increase in the visual openness and visual permeability of the north-west side of the Site, and reduction in width of built form visible from the west. Despite being set back behind Block B and Block D, and the use of appropriate materials, the top storey of the new building would be marginally visible in certain views over the height of existing buildings. Notwithstanding this, overall, “it is considered that there would be no significant changes to the perceived visual openness of the Site and the proposal would allow the visual openness of this part of the Green Belt to be maintained”.
- 6.3.25 In terms of physical openness, whilst the volume of buildings would increase, the proposed extension would be located behind existing buildings on the Site and the visibility and perception of this additional volume would be limited (as demonstrated in the viewpoint analysis).
- 6.3.26 The LVIA concludes that:

“The Scheme Proposal would therefore not have a greater impact on the visual openness of this part of the Green Belt than the existing Site and would not alter the perception of openness as experienced in the wider countryside.”

The duration of the development

- 6.6 The proposed development represents the continuation of the existing lawful established use of the Site as an extra care retirement village (use class C2). It is not a temporary use. The existing use of the Site has been operational since the mid-1990s and the proposed development involves the replacement of one of the buildings (Block C) with the new building forming an extension to Block B. As such, the proposal does not result in a change to the duration of the use or developed nature of the Site.

The degree of activity

- 6.3.27 There are currently 37 extra care units on the Site. Following the proposed development there will be a net increase of 13 extra care units on the Site. This will not cause a material increase

in activity over the existing operation of the Site. As set out in the Transport Assessment there will only be a marginal increase in trips as a result of the development (two additional trips in the AM and PM peak hours respectively).

- 6.3.28 The site is not set in a remote or 'tranquil' location devoid of activity related to human habitation and use, but rather in a relatively highly populated and trafficked area. The proposed development will not materially increase the level of activity on the Site and so will not have an impact on openness in this regard.

'Openness' Summary

- 6.3.29 The Site is previously developed and has an established, permanent use as a retirement village. The new building will replace an existing building and will be located within a cluster of existing buildings on the Site. The LVIA has found that the proposed development will not have a greater impact on the openness of the Green Belt than the existing development.
- 6.3.30 The increase in extra care units will not result in a material change to the duration of development or degree of activity at the Site.
- 6.3.31 The proposed development will therefore comply with paragraph 154 (g) of the NPPF and comprises 'appropriate' development in the Green Belt. It will not result in harm to the Green Belt as it is not considered to be inappropriate development and therefore, VSC are not required.

Proposed Update to NPPF

- 6.3.32 As set out in section 5 above, the government published draft proposed revisions to the NPPF in July 2024. As part of the proposed amendments to the NPPF, it is proposed that part g) of paragraph 154 is amended to:

“(g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.”

- 6.3.33 Should this wording be adopted in the final version (expected December 2024), the test would change to whether the proposed development would 'cause substantial harm to the openness of the Green Belt' rather than 'have a greater impact on the openness of the Green Belt than the existing development'. It is considered that this is a lower threshold of test and would mean that the planning balance weighs further in the proposed development's favour. However, the applicant reserves the right to provide an updated statement in relation to the new NPPF once published.

Other Considerations and Very Special Circumstances (VSCs)

- 6.3.34 National policy states that where a proposal would be classed as inappropriate development the identified harm to the Green Belt and other planning harm must be clearly outweighed by other considerations in order for VSCs to exist (NPPF, paragraph 153). As stated above, in our assessment the proposed development does not constitute 'inappropriate development' within the Green Belt. However, for the avoidance of doubt were the development to be considered inappropriate development by WBC, paragraph 153 of the NPPF will need to be engaged to consider whether harm is clearly outweighed by other considerations amounting to VSCs.
- 6.3.35 In order to undertake this assessment, the extent of harm arising to the Green Belt as a result of the development proposals must, first, be assessed and understood in order to assess whether this, in combination with any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 6.3.36 The LVIA includes an assessment of the Site's existing contribution to the purposes of the Green Belt and the existing 'openness' of the Site. It then goes on to evaluate the impact of the proposed development on the Green Belt purposes and openness. As set out above, our position is that there is no greater impact on Green Belt openness and, therefore, no harm. In this context, even if the Council takes a different view, any harm must be of a very limited level owing to the lack of contribution to the purposes of Green Belt, the existing setting of the Site and the lack of impact on openness. Whilst, in line with National Policy, any perceived harm should be given "substantial weight", other material considerations are only required to "clearly outweigh" the identified level of harm for VSCs to exist.
- 6.3.37 In addition to potential harm to the Green Belt by reason of inappropriateness, 'any other harm resulting from the proposal' must also be considered. As set out above, policy CP2 (a) of the CS and policy TB09 of the MDD are both supportive of the development that meets the requirements of an ageing population, and the proposal is considered to be in accordance with the principle of policy CP11 of the CS. No harm to the significance of heritage assets has been identified.
- 6.3.38 As such, given that any harm is limited, the 'other considerations' to outweigh this must be considered in this context. An initial case for 'very special circumstances' was set out in the May 2023 pre-application submission which included some of the key points set out below. The Council's pre-application response dated September 2023 indicated that the "factors raised above could amount to 'very special circumstances'" and that a robust justification of these factors would be required including the reasoning for the proposal's location.

6.3.39 The applicant's case for 'very special circumstances' comprises several elements which include the below. When taken together, this would clearly outweigh any identified harm to the Green Belt.

- i. The need for specialist housing for older people in WBC;
- ii. The Council's lack of 5 year housing land supply;
- iii. Freeing up family housing elsewhere in the Borough;
- iv. Health and wellbeing benefits to the residents of the scheme;
- v. Making an efficient use of a previously developed sites / ensuring retention over the long term;
- vi. Landscaping and Biodiversity Net Gain (BNG) benefits;
- vii Economic benefits; and
- viii. Energy / Sustainability Benefits.

6.3.40 We will consider each in turn in the paragraphs below.

i. Need for Specialist Housing for Older People

6.3.41 As detailed in Section 5 above, the NPPF (paragraph 63) and PPG provide significant support and emphasis on the importance of increasing the provision of a broad range of types of older person's housing. A clear priority of Government is to meet the housing needs of England's ageing population, and much of the existing supply of specialist housing for older people is unlikely to meet current and future needs.

6.3.42 As such, and as stated in the PPG (Para 001 Ref ID: 63-001-20190626), there is a 'critical' need to increase the supply of specialist housing to provide appropriate accommodation for older people.

6.3.43 This proposed development will deliver a significant number of extra care units to address the acute need for this type of accommodation, in line with PPG para 016 [Ref ID: 63-016-20190626]. The proposals will enable people to remain independent in a home of their own (whether purchased or rented) but with access to support and care and to an active social network.

6.3.44 The Local Housing Needs Assessment (LHNA) (2023) formed part of the evidence base of the Proposed Submission Plan consultation. The assessment was commissioned with the purpose of identifying the size, type and tenure of homes that will be needed in the future, and the housing needs of different groups within the Borough.

6.3.45 Section 7 of the report is dedicated to the needs of different groups, including older persons for the period 2021-2040. The LHNA recognises that the population in older age groups within WBC is expected to increase substantially during this period.

6.3.46 Paragraph 7.63 of this section of the report states:

“In conclusion, based mainly on the projected increase in the older population, Wokingham Borough Council would be justified in considering planning for a total of around 925 supported housing places over the period 2021-2040, provided through a mix of sheltered and extra care dwellings and domiciliary care to minimise the number of people who need to move to sheltered and extra care.”

6.3.47 It is evident that there is an identified need for this type of specialised accommodation. This need was recognised in the Proposed Submission Plan (2024), which sets out that the Council will ensure that a range of suitable housing options are available to meet a variety of needs, including the growing ageing and those with additional care and support needs (Objective 9). However, it is noted that the Proposed Submission Plan did not identify any land or sites to fulfil this need.

6.3.48 The accompanying Needs Assessment (Stantec 2023) that accompanies this submission concludes that the scale of the older population in Wokingham, its projected growth, the prevalence of disability amongst the older population and the number of older people living alone point to a need to significantly boost the supply of specialist housing for older people from a low base. The evidence points to an especially large shortfall in the provision of specialist housing for older owner occupiers. Further detail is set out in the report.

6.3.49 The Government considers the need to increase the provision of specialist housing for older people as critical nationally. All evidence points to the situation in Wokingham district being similar to that found elsewhere in England and certainly no better, so that by extension the issue must be considered critical at a local level. The proposal would deliver additional extra-care housing to meet an identified acute need within Wokingham Borough. We consider that this should be afforded substantial weight in favour of the proposal.

ii. 5-Year Housing Land Supply Position

6.3.50 The NPPF establishes a requirement for LPAs to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement/housing need (paragraph 75).

6.3.51 The most recent Five Year Housing Land Supply (5YHLS) Statement was published by WBC in January 2024. It concludes that the Council can demonstrate a 3.2 year supply for the period

1 April 2023 to 31 March 2028. The WBC Written Pre-application Response received on the 21st of September 2023 referred to the five year housing supply position of 3.85 years at that time. As such, WBC cannot demonstrate a 5-year housing land supply of deliverable housing sites and, in this case, the policies relevant to the supply of housing are considered to be out of date (NPPF, Paragraph 11). Where this is the case, the presumption in favour of sustainable development as outlined in NPPF paragraph 11 applies and permission should be granted unless:

“i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

6.3.52 Footnote 7 in the above includes land designated as Green Belt, areas at the risk of flooding and designated heritage assets, all of which are relevant to the Site. The application submission demonstrates that the proposal is in line with the relevant NPPF in terms of flooding and designated heritage assets. In terms of Green Belt, for the reasons set out above, it is considered that the proposal would not constitute inappropriate development, but should the Council take a different view, there are ‘very special circumstances’ that demonstrably outweigh the harm to the Green Belt.

6.3.53 As such, in our view, the overall shortfall in housing supply is one significant factor to be weighed in the planning balance in favour of the proposal.

iii. Freeing Up General Housing

6.3.54 As recognised by the Government in paras 4.42 to 4.44 of the White Paper ‘Fixing our broken housing market (2017)’, helping older people to move at the right time and in the right way can help their quality of life as well as freeing up more homes for other buyers.

6.3.55 Some of the family homes currently occupied by older people are likely to have been purchased originally to accommodate a family and may be poorly suited to the present needs of their occupiers due to their size or internal layout. Most of these family homes are currently being under-occupied, due to younger family members leaving home.

6.3.56 The Applicant’s analysis of residents demonstrates that the majority of residents moving into its developments, including Thamesfield, move from within a relatively close proximity of the Site.

This releases family homes which would be particularly attractive to those in need of larger houses to raise families and benefits the local housing market.

6.3.57 Further details regarding this matter are set out in the accompanying Economics Benefits Statement (Stantec 2023) that accompanies this submission. This references several reports which contain research relating to the under-occupancy of properties including statistics regarding the occupancy of properties in Wokingham. There are clear benefits which can be realised by the development in terms facilitating downsizing and freeing up a range of house types.

6.3.58 The provision of specialist housing more suited to the needs of older persons is likely to encourage them to move and would make a valuable contribution to increasing supply and addressing housing needs which should be weighed in favour of the proposal.

iv. Health and Well-Being Benefits

6.3.59 Generally, the residents in extra-care housing benefit from health and well-being benefits which include support services, amenities and on-site care. As well as providing benefits to the private individual, this also benefits society as a whole through relieving pressure on the NHS and social care services.

6.3.60 The accompanying Economic Benefits Statement sets out a detailed assessment in respect of social benefits associated with extra-care. This includes well-being impact and NHS Savings.

6.3.61 Thamesfield is well placed to deliver these health and wellbeing benefits. The on-site support positively contributes to reduce the need for residents to make use of primary health care services. In addition, the accessible design enables people to live independently, stay active and reduce the likelihood of trips and falls which account for a high proportion of hospitalisations in older people. The retirement village has well-kept gardens, which encourages activity and mobility, while the communal areas assist in reducing isolation. The landscaping scheme proposed as part of this development, will improve the range of outdoor activities, recreation and social spaces available to residents.

6.3.62 The health and wellbeing benefits of the proposal should be afforded substantial weight in favour of the application in line with recent appeal decisions (just one example among many being APP/B1930/W/21/3279463).

v. Making an efficient use of a previously developed sites / ensuring retention over the long term

6.7 The proposed development relates to an existing extra care site and operation on a site within the Green Belt. The proposed development is an opportunity to redevelop an outdated and

underutilised part of the Site, to improve the operation of the Site, to enhance the amenity of residents and to deliver an increase of much-needed extra care accommodation. This will be delivered in the immediate term. The proposal also seeks to capitalise on the wider investment available from the proposal to make improvements to the existing communal facilities and landscaping for the benefit of residents. This reflects an opportunity which does not exist elsewhere – it is specific to this existing site and use.

- 6.8 As such, the development seeks to make efficient use of this previously developed Green Belt site to improve the vitality and viability of the Site. This will ensure that the Site remains commercially successful to enable the retention of this use and operator over the long term.

vi. Landscaping and Biodiversity Net Gain (BNG) benefits

- 6.3.63 The proposals include a comprehensive landscaping scheme and tree planting made possible by the redevelopment of this part of the Site. This will provide significant benefits to the residents of the Site. The landscaping scheme will also deliver a net gain of 12.22% for habitats (including offsite but within Thamesfield) and 43.66% for hedgerows. This is in exceedance of the national policy requirement of 10% BNG.

vii. Economic Benefits

- 6.9 An Economic Benefit Statement (EBS), prepared by Stantec, has been submitted in support of this application. The report assessed the range of economic and social benefits arising from the construction and operational phases of the proposal, some of which have already been referenced above.
- 6.10 These economic benefits include direct construction employment, indirect construction jobs through multiplier effects, operational job generation, local expenditure and Council Tax.
- 6.3.64 The proposed development therefore supports the national planning policy objectives sets out in Chapter 6 of the NPPF by supporting economic growth and helping to build a strong, competitive local economy.
- 6.3.65 The social and economic benefits the development would bring has been given significant weight in several relevant appeal decisions (just one example among many being APP/A0665/W/18/3203413). The same approach and weight should be afforded by the Council in determining this application.

viii. Energy / Sustainability Benefits

- 6.3.66 The Energy Statement submitted in support of this planning application sets out the sustainability approach and energy strategy for the proposed development. This includes the

use of an all-electric, low carbon energy strategy with Exhaust Air Heat Pumps, an on-site (rooftop) photovoltaic (PV) array, and a strategy to reduce, reuse and recycle materials in alignment with the principles of circular economy throughout design, construction and operation. The Proposed Development will achieve a CO2 emissions reduction and a primary energy reduction well in excess of Building Regulations Part L 2021.

- 6.3.67 The new building will replace an existing building with poorly performing fabric and replace it with much more efficient and sustainable building. This is part of wider work by RVG through its Corporate ESG commitments which seek to drive sustainable outcomes not only across their new and existing developments but also their business as a whole. The Sustainability Officer was supportive of the sustainability approach submitted at the pre-application stage.
- 6.3.68 On this basis, the development is in accordance with Paragraph 157 of the NPPF, and policies CC04 and CC05 of the MDD by helping to reduce greenhouse gas emissions, designing with energy efficiency in mind, and the introduction of renewable energy sources.

Summary

- 6.3.69 In summary, in our assessment the proposed development does not constitute 'inappropriate development' within the Green Belt. However, if assessed as such, a decision maker would need to consider whether any perceived harm is clearly outweighed by other considerations amounting to VSCs (NPPF, para 153). Any perceived harm to the Green Belt must be of a very limited level owing to the lack of contribution to the purposes of Green Belt, the existing character and setting of the Site and the lack of impact on openness. This must be considered in combination with any other harm resulting from the proposal. This is considered to be limited. Other material considerations are required to "clearly outweigh" the identified level of harm for VSCs to exist. Given that the harm is limited, the other considerations must be considered in this context.
- 6.3.70 In summary, any limited harm would be clearly outweighed by "other considerations" including the acute need for older persons housing, the lack of 5-year housing land supply, freeing up general housing, health and wellbeing benefits, efficient use of land, landscape and biodiversity net gain benefits, economic benefits, and energy and sustainability benefits arising from the development. These "other considerations" would amount to "very special circumstances". This justification is supported by numerous Appeal Decisions, in which these benefits have been given substantial / significant weight individually and cumulatively so as to outweigh harm, including harm to the Green Belt. Given our analysis above, our conclusion is in line with these previous decisions.

Summary of Principle of Development

- 6.3.71 In summary, the proposal comprises the partial redevelopment of an existing Extra Care Retirement Village. The submitted LVIA contains a detailed assessment of the Site's existing contribution to the Green Belt purposes and Green Belt openness, and the potential impact of the proposed development has been undertaken. This concluded that the proposal would not have a greater impact on the openness of the Green Belt than the existing development. It is therefore considered that the proposed development is not 'inappropriate development' in the Green Belt and paragraphs 154 and 155 of the NPPF are not engaged.
- 6.3.72 Notwithstanding the above conclusion, this Planning Statement provides a significant number of 'other considerations' which taken together are considered to constitute 'very special circumstances' which clearly outweigh any perceived harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal. This is supported by the referenced appeal decisions. The proposal is therefore compliant with national Green Belt planning policy.
- 6.3.73 The proposed development is also in accordance with the principles of the spatial strategy set out in the CS and the principle of policy CP11 which relates to development outside of development limits. The provision of specialist accommodation for the ageing population is also supported by policy CP2 (a) of the CS and policy TB09 of the MDD.
- 6.3.74 The principle of development of providing additional extra care units on this previously developed, established Retirement Village is therefore considered to be acceptable in accordance with national and local planning policy.
- 6.3.75 In addition, as set out above, WBC cannot demonstrate a 5-year housing land supply of deliverable housing sites and, as such in this case, the policies relevant to the supply of housing are considered to be out of date (NPPF, Paragraph 11). The presumption in favour of sustainable development as outlined in NPPF paragraph 11 applies and permission should be granted unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. The 'tilted balance' therefore applies and the application should be considered in this context. It is considered that there is no clear reason to refuse the development and that any adverse impacts identified do not significantly and demonstrably outweigh the benefits set out above.

6.4 Provision of Affordable Housing

- 6.4.1 Policy CP5 of the CS sets out the requirements for affordable housing provision for developments and the Affordable Housing Supplementary Planning Document (SPD) (2013) supplements this policy.

- 6.4.2 The application is supported by a Financial Viability Assessment (Newsteer, 2024). This demonstrates that taking account of the scheme revenue and costs, together with the other planning benefits provided, the development does not have the ability to provide affordable housing on-site or as an off-site contribution.

6.5 Design

- 6.5.1 Policy CP3 of the CS sets out general principles for development of which several relate directly to design. These include ensuring that proposals are of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design. The design of the proposals has evolved over the course of the project, taking into account pre-application discussions and considerations from other technical and environmental disciplines. A Design and Access Statement has been prepared by Design Engine in accordance with policy CP3. This sets out full details of the proposed design, the design development process and the design rationale. Full details of the proposed development are set out in section 3 above.
- 6.5.2 The DAS contains an overview of the site context and considerations which have informed the design of the proposals. This includes the existing and surrounding built form of the site, access considerations, relationship with neighbouring properties, as well as environmental considerations such as existing trees, landscaping, flood risk and drainage. As set out above, it was identified that there are several existing deficiencies and inefficiencies in terms of the existing buildings and site layout that informed the proposals to redevelop the northern part of the site. The client brief and user requirements for the proposed building have also influenced the design.
- 6.5.3 The footprint and massing of the proposal has been designed to reflect the existing built form on the site and replaces a building in a similar position. It is set back behind the existing building (blocks A and B). The top floor has been inset to reduce the overall massing of the building. The opportunity to set the building further back from the northern boundary has been taken, to increase the distance between the proposed building and neighbouring buildings to the north.
- 6.5.4 The design of the proposed building was discussed at the pre-application stage, and the scale, form and massing of the building as well as the materials proposed have responded to feedback received. This includes the use of the pale red brick which has been informed by a detailed analysis of building materials in use at the Site and surrounding area and considerations such as maintaining the primacy of the main Thamesfield building (block A).
- 6.5.5 The proposal is informed by a clear design rationale and is of high quality design. It is therefore compliant with the design principles set out in chapter 12 of the NPPF, the National Design Guide, policy CP3 of the CS and the Borough Design Guide.

6.6 Landscape and Visual Impact

- 6.6.1 Policy CC03 of the MDD seeks to ensure that green infrastructure, trees and landscape features are protected and enhanced through development proposals. Policy TB21 sets out that proposals should address the requirements of the Council's Landscape Character Assessment and retain and enhance features that contribute to the landscape.
- 6.6.2 A Landscape and Visual Impact Appraisal (LVIA), and Green Belt Openness Appraisal has been prepared by Turley which is supported by Accurate Visual Representations (AVRs) for Representative Viewpoints (prepared by Preconstruct). The report establishes the baseline condition of the existing landscape character and visual receptors of the Application Site and its surroundings, assesses the potential degree of 'effect' the Proposed Development will have and considers the 'residual effect' of the Proposed Development once proposed landscape planting has matured. The identified landscape and visual receptors and the location of representative views and suggested visualisation types were presented to the case officer at Wokingham Borough Council and agreed at the pre-app meeting in May 2023.
- 6.6.3 The analysis of Green Belt openness considers both the physical and visual impact of the proposals on openness in accordance with guidance provided in the Planning Practice Guidance 2021. The sections of the LVIA relating to the Green Belt have already been discussed above.
- 6.6.4 The report summarises the proposals as removing a low quality building and area of landscape and replacing it with a building of larger scale but improved quality and design and with significantly improved landscape spaces. It highlights that the proposed building would be set behind the existing buildings on the Site and from most directions would be barely noticeable. The resultant effects on landscape character are identified as Neutral effects with no overall improvement or deterioration arising from the changes. The resultant effects on landscape receptors are identified as Neutral effects with the visual changes resulting in no overall improvement or deterioration to the quality or appearance of views.
- 6.6.5 In relation to Green Belt openness, the report concludes that, in accordance with paragraph 154g in the NPPF, the partial redevelopment of the previously developed site, would not have a greater impact on the overall openness of the Green Belt, and the purpose of including land within it, than the existing development.
- 6.6.6 The proposal is therefore in line with chapter 15 of the NPPF, and policies CC03 and TB21 of the MDD.

6.7 Landscape Design

- 6.7.1 Policy CC03 of the MDD seeks to ensure that green infrastructure, trees and landscape features are protected and enhanced through development proposals. Policy TB21 sets out that proposals should address the requirements of the Council's Landscape Character Assessment and retain and enhance features that contribute to the landscape. Policy TB23 seeks to ensure that landscaping provides opportunities for the enhancement of biodiversity. A Landscape Strategy and associated landscaping scheme have been prepared by Turley. The Landscape Strategy sets out the rationale behind the landscaping scheme for the Site and what it seeks to achieve.
- 6.7.2 The Landscape Strategy for the site includes the enhancement of existing spaces in and around the buildings on the site, providing high quality external spaces that residents can enjoy. The strategy ensures that no trees are proposed to be removed as part of the development. New tree planting is proposed along the southern boundary of the Site as well as the central courtyard. A new woodland walk is proposed along the northern boundary of the Site with places for residents to sit and socialise. The central courtyard will be transformed into a high-quality communal outdoor space with kitchen and residents' gardens either end as well as opportunities for residents to engage in outdoor activity and recreation.
- 6.7.3 The proposed development protects and retains existing landscape features and incorporates high quality planting and landscaping. It therefore accords with chapter 12 of the NPPF, and policies CC03, TB21 and TB23 of the MDD.

6.8 Heritage

- 6.8.1 The Site is within the Remenham Henley Bridge Conservation Area, opposite the Henley Conservation Area and close to the Park Place and Temple Registered Park and Garden which lies to the east. There are several listed buildings in the area as set out in section 5 above, however none on or in close proximity to the Site. The Statement states that Thamesfield has not been identified by the Council in any published material as a non-designated asset, and is not considered as such in the Statement. In accordance with paragraph 200 of the NPPF a Heritage Statement has been prepared by RPS which describes the significance of relevant heritage assets. The Statement also provides an assessment of the impact of the proposed development on the significance of the relevant heritage assets.
- 6.8.2 The Statement assesses the significance of heritage assets that may be affected by the development proposals, discounting those that would not be affected due to distance or lack of intervisibility. The Site, particularly the original Thamesfield building and the trees and landscaping down to the river is considered to contribute positively to the character and appearance of the Henley Conservation Area, as a very small part of its wider setting. The Site

is considered to be visually separated from the Remenham Conservation Area, but nonetheless there are elements of Thamesfield such as the original Thamesfield building and the well-treed nature of the grounds that contribute positively to the character and appearance of the Conservation Area. The later extensions to the main building do not positively contribute to the character and appearance of the Conservation Area.

- 6.8.3 The impact of the development proposals on the significance of the heritage assets identified is assessed in section 4 of the Statement. The proposed development is set back behind the western elevation of the Thamesfield building (Blocks A and B) and only a small part of it will be visible in views from the west and south west from the Henley Conservation Area – the top part of the building and the south western corner. It is not considered that this visibility in filtered view would affect the setting of the Henley Conservation Area such that it would harm its character and appearance. The proposed building will be largely screened from views from the Remenham Henley Bridge Conservation Area due to other buildings on Site and adjacent to it, and mature vegetation. It is not considered that the replacement building would harm the character of the Site or its contribution to the significance of the Remenham Henley Bridge Conservation Area. The choice of materials and design of the building are appropriate and assist with its integration into the Site and the wider Remenham Henley Bridge Conservation Area. The part of Thamesfield
- 6.8.4 The Statement concludes that the proposed development will cause no harm to the significance of the Henley Conservation Area or the Remenham Conservation Area. The proposal is therefore in accordance with chapter 16 of the NPPF and policies TB24 and TB26 of the MDD.

6.9 Archaeology

- 6.9.1 The Site is not within an area of archaeological potential or in close proximity to any Scheduled Monuments. The Site is within the Remenham Henley Bridge Conservation Area and close to the Park Place and Temple Registered Park and Garden. An Archaeological Desk Based Assessment has been prepared by RPS to investigate the archaeological potential of the Site in accordance with chapter 16 of the NPPF and policies TB25 and TB26 of the MDD.
- 6.9.2 The Assessment concluded that it is unlikely that archaeological remains are present in the Site and as such indicates that no further archaeological work should be required.

6.10 Flood Risk and Drainage

Flood Risk

- 6.10.1 A Flood Risk Assessment (FRA) which appropriately considers flood risk in relation to the Site has been prepared to support the planning application in line with the requirements of chapter

14 of the NPPF and policy CC09 of the MDD. The FRA consists of the FRA prepared by WSP dated October 2022 and the FRA Addendum prepared by JBA Consulting dated November 2024.

- 6.10.2 The Site is adjacent to the River Thames which lies to the west. The FRA sets out that the Site has a negligible risk of tidal and surface water flooding and a low risk of reservoir, sewer and groundwater flooding. In terms of fluvial flooding, the online GOV.UK Flood Map for Planning indicates that it is located within flood zones 2 and 3. JBA Consulting has undertaken a fluvial water hydraulic modelling study to provide a more detailed assessment of the level of flood risk at the Site in the absence of EA product 4 data. This has been approved by the EA and the results are set out in detail in the submitted reports. The FRA Addendum goes on to set out appropriate flood mitigation measures for the Site relating to finished floor levels, emergency planning, safe access and egress, confinement/safe refuge, and basement solutions. Flood mitigation against reservoir flooding and floodplain compensation will not be required.
- 6.10.3 National and local planning policy seeks to direct development to areas with the lowest risk of flooding from any source – this is known as the sequential approach. Paragraphs 167-172 of the NPPF and the PPG sets out the policy and guidance in relation to the sequential and exception tests. Table 2 “Flood risk vulnerability and flood zone ‘incompatibility’” (PPG Paragraph 079 Reference ID: 7-079-20220825) of the PPG sets out the types of development that are appropriate in different flood zones and where the exception test is required. Extra care developments are categorised as ‘more vulnerable’ development. As the Site is located in both flood zones 2 and 3a, the sequential test has to be applied, and if this is passed then the exception test is also required.
- 6.10.4 The Site is already developed and has been used as a nursing home/extra care facility for a significant amount of time. The Applicant is looking to make the most efficient use of its landholding on the Site, and as such has identified an opportunity to redevelop part of the Site. The proposals involve the demolition of some of the buildings on Site and replacement with a new building which forms an extension to Block B. The nature of the proposed development therefore means that it cannot take place on an alternative site with lower levels of flood risk. In short, the opportunity only exists on the Site, and as such, this is the sequentially preferable location. In addition, the proposal follows the sequential approach within the Site as the replacement building is located away from the areas of the Site at most risk of flooding. The development therefore passes the sequential test.
- 6.10.5 The two criteria of the exception test must also be passed as follows:
- It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh the flood risk; and

- Demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and which possible, reduce flood risk overall.

6.10.6 The Site will provide the wider sustainability benefits to the community:

- Contribution towards identified need for specialist housing for older people in Wokingham Borough Council (WBC).
- Contribution towards WBC's housing land supply.
- The provision of specialist housing and care for older people will free up family housing elsewhere in the Borough Council.
- The proposal will provide a wide range of health and wellbeing benefits to the residents of the scheme. This constitutes a public benefit in the context of reducing pressure on the NHS.
- The proposal makes efficient use of a previously developed (brownfield) site.
- The proposal will provide biodiversity net gains and landscaping benefits.
- The proposal will provide energy, economic and sustainability benefits.
- The proposal will reduce the existing impermeable areas on the Site and the proposed drainage strategy will introduce a sustainable drainage system to improve the current surface water management.

6.10.7 The flood mitigation measures set out in section 5 of the FRA Addendum, including setting the finished floor levels above the estimated flood levels will ensure that the development will be safe for its lifetime and will not increase flood risk elsewhere.

6.10.8 The proposed development therefore passes both the sequential and exception tests.

6.10.9 The development is therefore in accordance with policy CC09 of the MDD and chapter 14 of the NPPF.

Drainage

6.10.10 A Drainage Strategy Technical Note has been prepared to demonstrate that surface water can be managed in a sustainable manner in accordance with policy CP1 of the CS, policy CC10 of the MDD and chapter 14 of the NPPF. The Drainage Strategy Technical Note has been prepared by MNP and was informed by a utility survey and geotechnical site investigation.

6.10.11 The note sets out that surface water currently discharges into the River Thames and that foul drainage drains to a pump chamber on site where it is then pumped along Wargrave Road and into the public foul sewer network. It confirms that due to the underlying ground conditions, infiltration drainage will not be possible and therefore the utilisation of the existing drainage outfall on the Site is proposed. Surface water attenuation will be provided on the roof of the new building. Full details of the proposed surface water and foul water drainage system is provided in the report.

6.10.12 Overall, an evidenced suitable drainage strategy for the Site has been provided to ensure that the development does not increase flood risk elsewhere and in line with policy CP1 of the CS, policy CC10 of the MDD and chapter 14 of the NPPF.

6.11 Highways and Transport

6.11.1 A Transport Statement has been prepared by Transport Planning Associates (TPA) to support the planning application. The Statement sets out that the Site is within a sustainable location, with a wide range of active and public transport options in the vicinity, which provide realistic opportunities for existing and future staff to travel via alternative modes to the private car. These include bus services on Wargrave Road, pedestrian or cycle access to Henley town centre and access to the Henley Train Station which is approximately 1km from the Site.

6.11.2 There are no obvious existing collision clusters or highway safety deficiencies in the vicinity of the Site and there have been no incidents recorded at the Site access itself. The development will result in a net gain of 14 units on the Site and a trip generation assessment was undertaken informed by an Automatic Traffic Count (ATC) survey. This found that there will be no significant increase in trips using the existing access as a result of the redevelopment proposals (two additional trips in the AM and PM peak hours respectively). As such there would only be a negligible impact on the surrounding highway network.

6.11.3 The existing vehicular access from Wargrave Road is considered to be sufficient for the proposed development and no changes are proposed. The proposal will not result in an intensification of the existing Site access. Swept path analysis is provided to demonstrate how a fire appliance can access and exit the Site in forward gear.

6.11.4 The parking requirements have been informed by parking surveys undertaken by TPA – full details can be found in the Transport Statement. 8no additional parking spaces will be provided with the existing 2no disabled bays retained. This figure takes into account both additional residents and staff. Two cycle parking spaces in the form of a Sheffield Stand will be provided, in line with standards.

- 6.11.5 Thamesfield will continue to manage refuse collection internally with waste taken to bin storage collection points where it is then collected by a private company. Additional bin storage will be provided to meet the needs of the proposed development. This was informed by an assessment of the existing bin storage operation and requirements.
- 6.11.6 The proposed development will not cause an unacceptable impact on highways safety or cause severe impacts on the road network and provides sufficient and appropriate parking and access. As such it is in accordance with chapter 9 of the NPPF and policies CP1 and CP6 of the CS and policy CC07 of the MDD

6.12 Residential Amenity

- 6.12.1 The residential amenity of both future occupiers and existing neighbouring properties are considered in turn below. The planning application is supported by an Internal Daylight, Sunlight and Overshadowing Report and a Daylight and Sunlight: Impact on Neighbouring Properties Report, both prepared by GIA. The DAS also contains a section which sets out how the amenity of neighbouring properties has been considered along with cross sections. GIA and the architect have worked alongside the rest of the design team to maximise daylight and sunlight amenity within the proposed development, whilst balancing other compelling design factors such as the risk of overheating, noise, privacy and air quality.

Future Occupiers

- 6.12.2 The proposed building has been designed in accordance with national space standards. The apartments include several features which will enhance the amenity of the future residents. All apartments contain either a courtyard or river view with a generous integrated balcony. The layout of the building has been carefully considered with a central lift and stair core and central spine corridors on each floor. External amenity space is provided on site and the quality of this space will be improved through the proposed landscaping scheme.
- 6.12.3 The Internal Daylight, Sunlight and Overshadowing Report assesses whether the Proposed Development will provide residential accommodation considered acceptable in terms of daylight, sunlight and overshadowing. All the proposed habitable rooms and open spaces have been tested according to the methodology and criteria set out in the BRE guidelines. Full detail can be found within the report. It concludes that “on balance, the scheme will therefore offer acceptable daylight amenity to future residents”.

Neighbouring Properties in Thamesfield and Remenham Row

- 6.12.4 The Daylight and Sunlight: Impact on Neighbouring Properties Report, provides an assessment of the potential effect of the development on the amenity of the relevant neighbouring receptors

in relation to daylight and sunlight. The report assesses both the impact upon existing apartments in Thamesfield and properties to the north (Remenham Row). Overall, it concludes that “it is our view that the isolated daylight and sunlight impacts arising from the proposal are not detrimentally impacting the amenity of neighbouring occupiers, and therefore should be considered acceptable in context”.

- 6.12.5 The DAS sets out a detailed analysis of the proposed relationship between the new building and the existing residential apartments on the Site and neighbouring properties at Remenham Row. The position of the building and proposed openings have been carefully considered to minimise any negative outlook, overlooking or privacy impacts. In relation to existing block D, it is considered that the outlook for the apartments will be improved with the removal of the single storey element which currently adjoins it and as the proposed building will be set back further from this building. In relation to Remenham Row, the proposed building will be set back further from the boundary than the existing building, however it is acknowledged that the building is taller than the one it replaces.

Summary

- 6.12.6 The proposed development will provide a high level of amenity to future occupiers and will not significantly affect the amenity of neighbouring properties. It aligns with policy CP3 of the Core Strategy, policy TB07 of the MDD the and the WBC Design Guide.

6.13 Arboriculture

- 6.13.1 The Site contains several trees, primarily around the edges of the Site. It is located within a conservation area and there are several trees subject to Tree Preservation Orders on the Site. An Arboricultural Impact Assessment has been prepared by RPS. This contains the results of a tree survey undertaken and impact assessment and contains recommendations for tree protection during the development. No trees will require removal as part of the development and appropriate tree protection measures can be incorporated during works.
- 6.13.2 The proposed development protects and retains existing trees and is therefore in accordance with policy CC03 of the MDD.

6.14 Ecology

- 6.14.1 The proposed development involves the partial redevelopment of a brownfield site. It aims to retain important ecological features wherever possible, and provide appropriate mitigation and enhancements. The project Ecologist has been involved with developing the design in accordance with paragraph 174 of the NPPF and CS policy CP7 and MDD policy TB23.

- 6.14.2 A Preliminary Ecological Appraisal (PEA) has been prepared by RPS. This is informed by a desk study, phase 1 habitat survey and a preliminary bat roost assessment. The PEA identifies that the main habitats on Site comprise amenity grassland, hard standing, and buildings, with the grounds displaying areas of mixed woodland, introduced shrubs, and scattered trees. There are no ecological designations effecting the Site and the nearest Local Wildlife Site is Bransfords Woods which is 300m away from the Site boundary. The PEA concluded that the development was unlikely to affect designated sites or important habitats and suggests appropriate measures to prevent this. The most important habitats are the hedgerows and mature trees which are being retained. The PEA identified that several buildings on the Site have potential to support roosting bats and as such appropriate bat surveys were undertaken in summer 2023. No other protected species surveys were deemed necessary. Mitigation measures and enhancement opportunities including bird and bat boxes are suggested.
- 6.14.3 The Bat Survey Report sets out the findings of the surveys undertaken on the Site in summer 2023. A confirmed roost was confirmed on the conservatory which is part of Block C. As such a bat mitigation licence will be required for the demolition works, and before the building is demolished appropriate mitigation measures and alternative roosting opportunities would need to be created on the Site. Measures relating to lighting and the provision of bat boxes will also be required.
- 6.14.4 Biodiversity Net Gain (BNG) reporting has been undertaken by RPS. The landscaping strategy has been designed to increase biodiversity and delivers biodiversity enhancements including tree and hedgerow planting. The BNG Report sets out that the development proposals will deliver a net gain of 12.22% for habitats (including offsite) and 43.66% for hedgerows. This is in exceedance of the national policy requirement of 10% BNG.
- 6.14.5 Overall, it has been demonstrated that the proposals have been designed with biodiversity in mind, provide appropriate mitigation measures where harm is identified to habitats or species and deliver new biodiversity features to enhance the biodiversity of the Site. The proposed development is therefore in accordance with chapter 15 of the NPPF and CS policy CP7 and MDD policy TB23.

6.15 Sustainability

- 6.15.1 An Energy Strategy and Sustainability Statement has been prepared by Hoare Lea and accompanies the planning applications. The report provides an overview of the sustainability targets and approach and the energy strategy for the development. This includes the use of an all-electric, low carbon energy strategy with Exhaust Air Heat Pumps, an on-site (rooftop) photovoltaic (PV) array, and a strategy to reduce, reuse and recycle materials in alignment with the principles of circular economy throughout design, construction and operation. The Proposed

Development will achieve a CO2 emissions reduction and a primary energy reduction well in excess of Building Regulations Part L 2021.

- 6.15.2 The proposed development will deliver a high quality sustainably designed and constructed development which incorporates low carbon and renewable technologies and therefore aligns with policies CC04 and CC05 of the MDD and the Sustainable Design and Construction SPD.

6.16 Noise

- 6.16.1 An Environmental Noise Survey has been prepared by Hoare Lea and is submitted as part of the planning application. A noise survey has been undertaken at the site to quantify the existing ambient and background noise levels and an assessment has taken place to determine the external noise limits for building services plant required to meet the WBC's general noise emission limits. The report also contains guidance regarding the building envelope and ventilation strategy.
- 6.16.2 The noise impact of the development has been assessed and the report concludes that the Site is suitable for the proposed development. The proposed development is therefore in accordance with policy CC06 of the MDD

7 SUMMARY AND CONCLUSIONS

- 7.1.1 This Planning Statement has been prepared by Stantec on behalf of Retirement Villages Development Limited to assess the planning matters in relation to a Full Application for the following description of development at Thamesfield Retirement Village, Wargrave Road, Remenham:

“Part demolition of existing building and replacement with a three-storey extension to provide extra-care units (Use Class C2), with associated soft and hard landscaping works; provision of additional vehicle parking, bin stores and ancillary structures; and alterations to existing basement”.

- 7.1.2 In terms of Section 38(6) of the Planning and Compulsory Act 2004, the Development Plan comprises the Wokingham Core Strategy (2010), and ‘the Managing Development Delivery Local Plan Document (2014).
- 7.1.3 The principle of development is considered to be acceptable in accordance with the Development Plan and the NPPF. The Site is located within the Green Belt, and it is considered that the proposed development is appropriate development in the Green Belt. Should the Local Planning Authority consider the proposed development to be ‘inappropriate development’ in the Green Belt, it has been demonstrated that ‘very special circumstances’ exist. In addition, WBC cannot demonstrate a 5 year housing land supply and therefore the tilted balance is engaged.
- 7.1.4 The supporting technical documents submitted as part of this Planning Application collectively confirm that the proposed development would not have any unacceptable adverse impacts subject to the recommended mitigation measures being put in place.
- 7.1.5 Overall, the proposal is in accordance with the Development Plan and other material considerations and as such planning permission should be granted without delay.

