



Head of Development Control
Wokingham Borough Council

30th January 2025

(by email only)

Dear Sir/Madam,

Re : Application 243125 at Thamesfield, Wargrave Road, Henley-on-Thames

Following the submission of the above planning application which proposes the redevelopment of the existing Retirement Home at Thamesfield, I write on behalf of all of the current neighbouring residents at Remenham Row (numbers 1-9 and 11) to object to the proposed scheme. As explained below, the objections relate to the direct and significantly detrimental impact the scheme will inevitably have upon the amenity of residents in Remenham Row, plus the appearance of the scheme in the wider environment. It is strongly considered that such objections are sufficient in themselves for the application to be refused, due to conflict with development plan policies and the Council's Design Guide, albeit there may be further concerns raised by others that warrant additional reasons for refusal.

Sadly, the proposed design appears to have been put forward based purely on the operator's ideal requirements without giving any consideration to the impact the scheme has upon the adjacent residents. This is rather highlighted by the fact that the existing Retirement Home and grounds cover a considerable plot area, yet the part of the site that has been identified for redevelopment is that which is closest to the neighbouring properties. There is no explanation in the submission as to why other parts of the site could not accommodate the desired additional units.

In putting forward the proposed design, the Applicants appear to have ignored the Council's Pre-Application response, which advised that the minimum separation distances, as set out at R16 of the Borough Design Guide, should be taken into consideration to ensure no detrimental impacts occur to the amenities of neighbouring properties. Other than the inclusion of the table of such distances at page 33 of the Design & Access Statement, no reference is made within either the Design & Access Statement or the Planning Statement as to the adherence or otherwise of the scheme with such distances. This is perhaps understandable given that the proposed scheme is not even close to achieving the required separation distances that are set out to ensure appropriate levels of amenity can be achieved / maintained.

For clarification, R16 of the Council's Design Guide sets out separation distances for different types and heights of development in order to maintain privacy and limit the sense of enclosure. For schemes that introduce development over two storey height, as in this case, the required separation distance is 30m. Such a category is entirely appropriate given that the two elevations facing each other in this instance both include living rooms – in the first and second floor apartments of the proposed scheme, and the ground floor of the existing properties on Remenham Row. The first floor of the Remenham Row properties facing Thameside also include bedrooms and clear glazed bathroom windows (indicative of the appropriate relationship at present).

The actual separation between properties as proposed by the planning application is 20m. This is not slightly below the recommended distance, but a very significant 10m! Such a difference would have a substantial impact on the resulting amenity levels, and this is better understood when considering the specific relationship in this instance. The below photo shows the current relationship between the relevant Remenham Row properties and the existing development at Thamesfield.

It is apparent that it is the single storey nature of this part of the Thamesfield development, that makes for an appropriate relationship with the Remenham Row properties which include living rooms at the front. Whilst the single storey development at Thamesfield is clearly apparent above the boundary wall, it does not overly dominate the outlook from the Remenham Row properties, and appropriate privacy is maintained as a result of the wall and intermittent low-level planting.



Photo 1

The replacement of the existing single storey development with the proposed three storey structure would inevitably result in an overly dominant appearance when viewed from within or to the front of the Remenham Row properties. Reference will be made to the sunlight/daylight impact later, but in terms of general outlook from the living room of the house(s), this will alter from one which currently includes low level buildings beyond the boundary wall, some planting which breaks up the buildings, and a lot of sky, to a 3-storey elevation which completely fills and dominates the outlook. There will be no opportunity for any effective planting within the application site due to the overly close proximity of the development to the side boundary.

In terms of privacy, the fact that the separation distance is a substantial 10m less than the Council's Design Guide requires, becomes all the more relevant given that the proposed 3 storey elevation, which will face directly towards the front elevation of the Remenham Row properties, includes full height living room windows and balcony areas. The potential for overlooking towards the living rooms and bedrooms of the Remenham Row properties would be significant as a result, and the sense of overlooking would detract substantially from the amenity levels currently enjoyed. The fact that current amenity levels of existing residents at Remenham Row will be significantly harmed

cannot be questioned. The fact that such resulting amenity levels will be reduced to an unacceptable level is clearly indicated by the sub-standard separation distances involved.

It is noted that the application is supported by a '*Daylight & Sunlight – Impact on Neighbouring Properties Report*'. The Report itself highlights why the scheme is inappropriate. At 1.7 it acknowledges that two of the six tested properties will not receive the daylight and sunlight values recommended by the BRE Guidance. This in itself highlights that the scheme is poorly designed. This is not a city centre site with high rise development nearby and sub-standard levels to be expected. A well-designed scheme could and should ensure that all proposed and existing accommodation receives good levels of daylight and sunlight. The proposed scheme fails to do so, as the Report itself acknowledges.

The Report (not surprisingly) chooses to highlight reference to taking a flexible approach in applying policies and guidance relating to daylight and sunlight. However, it is important to note the reason for such flexibility, as set out in paragraph 130 (c) of the NPPF (Dec 24), as highlighted below (my underlining);

'...authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).'

The resistance of the current scheme, and requirement for the redevelopment to adhere with daylight and sunlight guidance would not inhibit making efficient use of the site in question. It would simply involve an alternative design that gives greater consideration to the established accommodation already in place. And as explained in this objection letter, the resulting scheme as proposed would most definitely not provide acceptable living standards.

The Report acknowledges that 1 Remenham Row will not be BRE compliant, with one window losing 24% of light as a result of the development. The report also acknowledges (at Appendix 4) that the Annual Probable Sunlight Hours for numbers 1-4 Remenham Row will reduce by approx. 20 – 26% in the winter months. Whilst the Applicants may deem that not to be an issue, it clearly will be a notable detrimental impact on the amenity levels currently experienced by the neighbouring residents. This is further illustrated by the below photo 2, which was taken from the front of No. 3 Remenham Row at 11:25am on Saturday 14th December 2024. It shows very clearly the shadow line caused by the existing single storey buildings, meaning sunlight still gets to the frontage and south facing ground floor elevation of the Remenham Row properties (including living rooms). It is clear that the introduction of a 3-storey building to replace the single storey structures, as proposed, will result in the overshadowing of (at least) the ground floor outlook and front garden areas of the Remenham Row properties opposite.



Photo 2

Figure 02 of the Sunlight & Daylight Report shows a 3D model of the scheme and helps illustrate the detrimental impact that will result in terms of the overbearing impact and privacy issues for the residents of the Remenham Row properties.

The relevance of the significant detrimental impact upon the amenity of neighbouring residents, as explained above, is that it results in clear conflict with relevant development plan policy, in addition to the Council's Design Guide. Policy CP3 of the Council's Core Strategy sets out a number of general principles for development, the first of which is set out below (my underlining);

'Planning permission will be granted for proposals that:

- a) 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 without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life*

It is inevitable that the proposed scheme will have a detrimental impact upon the adjoining occupiers at Remenham Row – even the Applicants submission, and associated reports acknowledge this. For reasons set out within this letter of objection, the scale of such detrimental impact will be significant. A combination of the overbearing impact of the three-storey scheme in such close proximity, loss of light and loss of privacy, will all combine to leave an unacceptable level of residential amenity for the neighbouring occupiers. As a result, the proposed scheme is in fundamental conflict with Policy CP3 and should be refused accordingly.

Such concerns will not come as any surprise to the Applicants. They were raised by the neighbouring residents at the Consultation Event referred to in the submission. Sadly, the Applicants chose not to amend the scheme to address the concerns raised.

In addition to the concern about the immediate impact on the residential amenity of neighbouring properties, concern is also raised with regards the visual impact of the scheme in the wider environment. A decision has been taken by the Applicants to propose a modern brick and cladding design that will clearly contrast with the established main building on site. When combined with the fact that the new development will be a storey higher than the main building already on site, it is inevitable that its presence will be very apparent in the wider area, particularly when viewed from the amenity area to the south of the Remenham Row properties, and from public views on the opposite side of the River Thames.

The submitted DAS includes a number of (non-verified) CGIs with the proposed building super imposed. The image at page 28 (reproduced below) is considered most helpful when assessing the impact from further afield. It is recognised that a darker brick is now proposed, which would further emphasise the built form of the extension. It is apparent from this image that the scale and mass of the building would be notably increased from that which is currently evident. Other parties will comment in detail on the impact of this upon the adjacent Conservation Area, and well used footpaths that adjoin the river, but in general terms it will represent a notable increase in mass and height that will detract from the area. The scheme therefore is in conflict once again with Policy CP3(a) as set out above.



Yellow Brick - Non verified view

Extract from DAS page 28

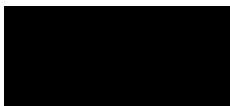
This submission has explained that the proposed scheme has given little, if any, consideration to the neighbouring properties when drawing up the design. Concern has also been expressed about the wider impact of the proposal on the environment. As a result, the scheme has been shown to be in conflict with relevant development plan policy (CP3 of the Core Strategy). It follows that the application should be refused planning permission unless material considerations indicate otherwise.

The Applicants suggest that the need for such accommodation is a material consideration. The Council will need take a view on that position from others. However, even if it is agreed that there is a need for such accommodation it does not justify inappropriate schemes to provide it. Alternative well designed proposals on this or other sites will be able to offer the opportunity to deliver appropriate elderly accommodation to address any need. There are no material considerations that warrant a poorly designed scheme and a decision that is not in accordance with the development plan. Conflict with the Council's Design Guide as highlighted above, is an additional material consideration that indicates the proposed scheme should be refused.

Finally, I should highlight that the neighbouring residents at Remenham Row are not opposed to the principle of additional accommodation being provided at the site. They recognise this will result in some additional activity at the site and surrounds but are not trying to prevent any form of new development from taking place. Unfortunately, the scheme as proposed has been poorly designed for the reasons set out above and will require significant amendments in the siting and scale of development before such concerns are overcome. It is therefore strongly considered that the current application should be refused.

Officers (and Councillors) are invited to visit the properties at Remenham Row prior to any recommendations being made, in order that they can properly understand the detrimental impact that will result. Please contact me in order to arrange such a visit.

Yours sincerely,



Andy Meader BSc Hons Dip TP MRTPI

Director

andy.meader@am2planning.co.uk