



Thamesfield
Wargrave Road
Remenham
Berks

Appeal Statement

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Retirement Villages Development Limited

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1 Introduction

1.1 Introduction

1.1.1 Stantec has been instructed by Retirement Villages Development Limited (the “Appellant”) in respect of a scheme relating to Thamesfield Retirement Village, Wargrave Road, Remenham (the “Site”) for which this Appeal is made arising from the grounds of refusal.

1.1.2 The Appellant has been developing and operating housing-with-care communities since 1981. The Appellant first built a community of its kind in the UK at Cranleigh, Surrey and today operates 17no sites across the country with over 1,500 self-contained homes.

1.1.3 This appeal is lodged under Section 78 of the Town and County Planning Act 1990 (as amended) following the refusal by Wokingham Borough Council (‘WBC’) to grant full planning permission in respect of application reference 243125 (‘the application’) by notice dated 11th December 2025.

1.1.4 The application comprises the partial redevelopment of the Site through the demolition of an existing building and replacement with a new building to provide for additional extra care units, resulting in a net increase of 13 units. The Site Location Plan is provided in **Appendix A**.

1.1.5 The proposed description for the application was as follows:

“Full application for proposed part demolition of existing building and replacement with a three-storey extension to provide extra-care units, with associated soft and hard landscaping works; provision of additional vehicle parking, bin stores and ancillary structures; and alterations to existing basement.”

1.1.6 The application was submitted to WBC and validated on 17th December 2024.

1.1.7 The application was reported to WBC’s Planning Committee on 10th December 2025, where officers recommended that planning permission be granted, subject to conditions and the completion of a Section 106 legal agreement. The planning officers Committee Report can be found at **Appendix B**.

1.1.8 At the Planning Committee, Members resolved to refuse planning permission. The decision was formally issues by WBC on 11th December 2025 with five reasons for refusal, as set out on the decision notice in **Appendix C**. The reasons for refusal were as follows:

1. *The proposed development, by reason of its bulk, scale, height, and proximity to neighbouring dwellings at Remenham Row, would result in an unacceptable level of overlooking and perceived loss of privacy to the front elevations of those properties, together with an unneighbourly overbearing impact. The development would result in*



material harm the living conditions of existing residents. The proposal is therefore contrary to Section 12 of the NPPF, Policy CP3 of the Wokingham Core Strategy and the Borough Design Guide.

- 2. The proposed development, by reason of its scale, height, bulk and massing would fail to preserve or enhance the character or appearance of the Remenham and Henley Bridge Conservation Area and the Henley on Thames Conservation Area. This would result in limited-moderate less than substantial harm to the significance of these designated heritage assets. When applying paragraph 215 of the National Planning Policy Framework, the identified harm is not outweighed by the public benefits of the proposal. Accordingly, the proposal conflicts with the statutory duty under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16 of the NPPF (2024), Policy CP3 of the Wokingham Core Strategy and Policy TB24 of the Managing Development Delivery Local Plan.*
- 3. In the absence of the complete legal agreement, the proposed development fails to secure opportunities for training, apprenticeships and other vocational initiatives to develop local employability skills contrary to MDD Local Plan Policy TB12.*
- 4. In the absence of a completed legal agreement, the proposed development fails to mitigate the increases in demand on NHS services through failing to contribute towards the creation of additional clinical capacity at Bell or Hart GP Surgeries or an identified primary care estates project in the local area to serve the development. This is contrary to CP1 of the Core Strategy and the NPPF (2024).*
- 5. In the absence of a completed legal agreement to secure biodiversity net gain monitoring, the proposed development fails to demonstrate and secure that there would be no long term biodiversity net loss as a result of the proposal by either on site mitigation or off-site compensation and how this would be managed, contrary to Core Strategy Policy CP3 and CP7, MDD Local Plan Policy TB23 and the NPPF (2024).*



2 The Site and Surrounding Area

- 2.1.1 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 personal care.
- 2.1.2 A full description of the Site, its location and the surrounding context is provided at Section 2 of the Planning Statement.



3 Planning History

3.1.1 The planning history relevant to the Site as summarised by the WBC's Committee Report is provided in the table below.

Table 1: Planning History

Ref	Description	Decision	Decision Date
243125	Full application for proposed part demolition of existing building and replacement with a three-storey extension to provide extra-care units, with associated soft and hard landscaping works; provision of additional vehicle parking, bin stores and ancillary structures; and alterations to existing basement.	Refused	11/12/2025
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
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



4 Proposed Development

4.1 Background

4.1.1 The description of development for the planning application was:

“Full application for proposed part demolition of existing building and replacement with a three-storey extension to provide extra-care units, with associated soft and hard landscaping works; provision of additional vehicle parking, bin stores and ancillary structures; and alterations to existing basement.”

4.1.2 As set out in the Description of Site and Surroundings Section within the Planning Statement (Section 2), Thamesfield currently comprises 37 extra-care units (use class C2).

4.1.3 The age and size of the buildings and extensions at Thamesfield means that the functionality of the Site is compromised. 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 Appellant aims to improve the quality of the development and maximise the efficiency of its operation.

4.1.4 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.

4.2 The Proposal

4.2.1 The proposal comprises the following elements:

- Demolition of Block C which contains 4 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.

4.2.2 For the avoidance of doubt, the red line boundary extends beyond the areas proposed for development to include land where Biodiversity Net Gain (BNG) will be delivered on site.



- 4.2.3 As set out in Section 2.7 of the accompanying Design and Access Statement (page 11), Block C is proposed to be demolished in its entirety, with partial demolition of Blocks A, B and D to facilitate the extension. For clarity, a plan is provided at Appendix D showing the areas of the buildings to be demolished.
- 4.2.4 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, a net gain of 13 extra care apartments on Site.
- 4.2.5 The proposal also includes proposed 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 investment from the appellant within earlier phases of work has already improved the community and back of house spaces. The further changes proposed through this appeal would provide a high quality of communal facilities to support the enlarged community.

4.3 Proposed Layout and Design

- 4.3.1 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. During the determination process, a resubmission package was issued to the Council on 17th September 2025 to address consultation comments following meetings with the Council's Planning Officer.
- 4.3.2 The final layout of the proposed development is shown on the proposed Site plan drawing 2212-P-100- 02 submitted with this appeal. The details of the design evolution are set out in Section 3.1 -3.5 of the accompanying DAS, prepared by Design Engine (ref: 2221-R-014 Rev 02).
- 4.3.3 The key changes to the design during the determination in response to comments from the public and consultees were as follows:
- The roof of the extension was amended reducing the perceived massing of the proposed building, and so minimising impact on neighbouring properties.
 - Dormer windows were introduced to break up the massing of the top floor, with accommodation within the roof served by dormers only.
 - First and second floor projecting balconies were removed and replaced with Juliet balconies, which in turn brought the building line away from the northern and southern elevations. This in turn increased the separation distance from the northern boundary and minimised the perception of overlooking towards Remenham Row, while also reducing the building's prominence in views from the north and west.
- 4.3.4 These changes reduced the overall visual massing of the proposed extension and further limited impact on the amenity of neighbouring properties along Remenham Row. For full details on the



changes please refer to resubmission covering letter, dated 17th September 2025 (ref: 3331001644/A3/LD).

- 4.3.5 This is recognised at paragraph 8.9 of the Committee report where the Officer state *“following reductions to the scheme, the first and second floor ‘walk out’ balcony elements have been removed and instead replaced with Juliet style balconies which further limits visibility and time spent in these areas, particularly as sound outlook from the side elevation is present overlooking the Thames and Wargrave Road for the variety of apartments.”*

4.4 Biodiversity Net Gain

- 4.4.1 During the course of the application's determination, the red line boundary was revised in response to the updated drainage strategy and evolving site proposals. This amendment ensures that all Biodiversity Net Gain (BNG) enhancements, together with the attenuation tank and associated pipework, are appropriately captured within the application boundary. For the avoidance of doubt, BNG is to be provided entirely within the red line.
- 4.4.2 A post-development habitat plan is included at **Appendix E** for information, confirming how BNG will be delivered.

4.5 Landscaping

- 4.5.1 One of the key drivers for the redevelopment of the northern part of Thamesfield is 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.
- 4.5.2 The Landscape Strategy provides the full details of the soft and hard landscaping proposals for the development. 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.
- 4.5.3 At paragraph 6.3 of the Officers Committee Report, it is noted that, in accordance with Policy TB21, the illustrative soft landscaping proposals are of good quality and include notable tree, hedgerow and ornamental planting around the Site's periphery and within the proposed courtyard and amenity spaces. The Officer concludes that this strengthens the Site's connection to the landscape.
- 4.5.4 In addition, as recognised at paragraph 17.7 of the Officer's Committee Report, the removal of existing areas of hardstanding and replacement to landscaping would increase the permeable



surfacing across the Site improving surface water infiltration and increasing overall flood storage capacity.

- 4.5.5 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.

4.6 Access and Parking

- 4.6.1 Vehicle and pedestrian access onto the Site will remain as existing, utilising the main entrance from Wargrave Road.
- 4.6.2 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.
- 4.6.3 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.
- 4.6.4 Wokingham Borough Council Highways raised no objection to the proposal, subject to conditions.

4.7 Housing Mix

- 4.7.1 The proposed scheme provides a net increase of 13no. 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. The application proposes 15no 2-bed units and 2no 1-bed units.
- 4.7.2 The proposal provides 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.
- 4.7.3 The application does not propose any on Site affordable housing as it has been demonstrated through the submitted Financial Viability Assessment that this would not be viable for the Site. This was not disputed by the case officer within the committee report, nor does it form part of the reasons for refusal.
- 4.7.4 The accommodation mix will provide a wide range of extra care dwellings and offer older people a variety of housing choice.



4.7.5 The Officer highlights in his Committee Report that there is a significant unmet need for older persons' accommodation within WBC noting demographic growth in the ageing population (Committee Report para 3.41). In addition, the Officer makes reference to WBC Local Housing Needs Assessment 2023 (LHNA), as it identifies a substantial shortfall in specialist older persons accommodation over the plan period, with '857 more rented units required by 2040' (Committee Report para 3.46). The Officer also confirms at paragraph 3.46 that the proposal would directly contribute towards addressing this identified need through the provision of additional C2 extra care units. In terms of the housing mix, the officer confirms at paragraph 11.4 that the proposed mix of one and two bed extra care units is welcomed and acceptable.

4.8 Planning Obligations

4.8.1 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.

4.8.2 The planning obligations had been agreed with the Council in advance of the application being reported to Committee. The agreed Heads of Terms for the Section 106 agreement were as follows:

- Employment and Skills Plan – Provision of an Employment and Skills Plan, or an agreed financial contribution in lieu, to be secured and delivered in accordance with the Section 106 agreement.
- Biodiversity Net Gain – Securing the monitoring and implementation of the Habitat Management and Monitoring Plan (HMMP) to ensure delivery of the approved Biodiversity Net Gain objectives over a 30-year period.
- NHS Contribution – A financial contribution of £15,405 towards supporting local NHS capacity through investment in a capital project, payable prior to commencement of development.

4.8.3 This appeal submission is accompanied by a Draft Section 106 (S106) which captures the above planning obligations.

4.9 Benefits of the Scheme

4.9.1 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 which was part of the original planning application submission;

- The proposal would also result in the improved financial viability of the Integrated Retirement Community to ensure retention of important specialist housing over the long-term.
- 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 2.5 years (Base date 31st March 2025);
- 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. This is in accordance with the NPPF (Paragraph 124) which seeks to make as much use as possible of previously developed ('brownfield') land;
- 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 spend by residents and staff;
- Ensuring retention of Thamesfield over the longer term, with associated economic benefits in respect of job retention for 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,
- BNG to be provided on Site;.
- Contributions towards CIL.

4.9.2 The list is not exhaustive; however, it provides a summary of the principal benefits and opportunities that would result from the proposed development.



5 Planning Policy Context

5.1.1 This Section sets out the national and local planning policy framework relevant to this appeal.

5.2 Emerging National Planning Policy

5.2.1 On the 16th December 2025, the Government published a consultation on proposed updates to the National Planning Policy Framework. This consultation period runs until the 10th March 2026. As the document is only at a draft consultation stage, the current adopted NPPF (December 2024) remains the materially relevant national policy document.

5.3 National Planning Policy Framework

5.3.1 The NPPF was originally published on 27th March 2012, however, has since been subsequently updated with the most recent update published in December 2024. For dealing with planning appeals, the policies in the Framework are applied from the date of publication. Therefore, the policies in the December 2024 version of the NPPF are relevant to this appeal. The reason for refusal cites conflict with the NPPF but does not refer to a policy or paragraph.

5.3.2 Sections 12 (Achieving well-designed places) is cited for Reason for Refusal 1, and section 16 (Conserving and enhancing the historic environment) is cited for Reason for Refusal 2. These are explained in detail in Section 6 below.

5.4 Local Planning Policy

5.4.1 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.

5.4.2 The relevant development plan documents for this appeal include;

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

Wokingham Borough Core Strategy (January 2010) (CS)

5.4.3 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 (Referred to in Reason for Refusal 4)



- Policy CP2 – Inclusive Communities
- Policy CP3 – General Principles for Development (Referred to in Reason for Refusal 1, 2 and 3)
- Policy CP5 – Housing Mix, Density and Affordability
- Policy CP6 – Managing Travel Demand
- Policy CP7 – Biodiversity (Referred to in Reason for Refusal 5)
- Policy CP9 – Scale and Location of Development Proposals
- Policy CP11 – Proposals Outside Development Limits (Including Countryside)
- Policy CP12 – Green Belt

5.4.4 The policies referenced within the Council's Reasons for Refusal are noted in brackets within the above list. The Appellant provides commentary to address policies relevant to the reasons for refusal within section 6 below.

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

5.4.5 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 TB12 - Employment Skills Plan (Referred to in Reason for Refusal 3)



- Policy TB21 – Landscape Character
- Policy TB23 – Biodiversity and Development (Referred to in Reason for Refusal 5)
- Policy TB24 – Designated Heritage Assets (Listed Buildings, Historic Parks and Gardens, Scheduled Ancient Monuments and Conservation Areas) (Referred to in Reason for Refusal 2)

5.4.6 The policies referenced within the Council's reasons for refusal are noted in brackets within the above list. The Appellant provides commentary to address policies relevant to the reasons for refusal within section 6 below.

5.5 Supplementary Planning Documents

Borough Design Guide (BDG) (2012)

5.5.1 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. The BDG is referred to in reason for refusal 1, the Appellant provides further commentary in Section 6 below.

5.6 Emerging Local Planning Policy

5.6.1 A list of the policies most relevant to this appeal can be found at paragraph 5.5.6 of the accompanying Planning Statement.

6 The Appellant's Case

- 6.1.1 The Council's Committee Report confirms that the proposal was considered acceptable in principle, with Officers concluding that the redevelopment of this established Extra Care retirement community represents an appropriate and sustainable form of development.
- 6.1.2 The acceptability of the principle of development is further reflected in the fact that it does not form part of the Council's reasons for refusal. No technical objections were raised by the Council or its consultees in relation to the principle of development, including matters relating to sustainability, need, or Green Belt policy. This position is reinforced considering there were no objections raised by technical consultees in respect of highways and access, sustainability, flood risk and drainage, ecology, or the suitability of the Site for the proposed use. The only objection was made by the Council's Built Heritage Officer, which is discussed further at section 6.3 below. The Site was also accepted as previously developed land and is sustainably located for its intended use which forms an appropriate basis for redevelopment.
- 6.1.3 No additional technical evidence has been prepared to inform this appeal. The Appellant relies on the documents which were before the Council at the time of the decision and were accepted by the Case Officer as robust.
- 6.1.4 In light of the above, this Statement of Case focuses on addressing the specific Reasons for Refusal, which relate to detailed matters rather than the principle of development. The matters set out in the original submission documents are therefore relied upon, with relevant elements drawn upon where necessary in responding to the reasons for refusal. The established acceptability of the principle of development attracts significant weight in favour of the proposal in the overall planning balance. The planning balance is discussed in detail in section 7.2 below.

6.2 Reason for Refusal 1

The proposed development, by reason of its bulk, scale, height, and proximity to neighbouring dwellings at Remenham Row, would result in an unacceptable level of overlooking and perceived loss of privacy to the front elevations of those properties, together with an unneighbourly overbearing impact. The development would result in material harm the living conditions of existing residents. The proposal is therefore contrary to Section 12 of the NPPF, Policy CP3 of the Wokingham Core Strategy and the Borough Design Guide.

Council's Case

- 6.2.1 The Council's case in relation to Reason for Refusal 1 is that the scale, bulk and height of the proposed development, together with its physical proximity to dwellings at Remenham Row, would result in “an *unacceptable level of overlooking*” and a “*perceived loss of privacy*” to the front elevations of those properties. The Council further contends that the development would result in an “unneighbourly overbearing impact”, leading to material harm to the living conditions of existing residents, contrary to Section 12 of the NPPF, Policy CP3 of the Core Strategy and guidance within the BDG.

Policy Context

- 6.2.2 Section 12 of the NPPF requires development to achieve a high standard of amenity for existing and future users as part of the delivery of well-designed places. In particular, paragraph 135 requires that development provides a high standard of amenity and responds positively to its context. This does not require the preservation of existing outlook or the avoidance of all change, but rather that impacts do not give rise to material harm to living conditions.
- 6.2.3 Policy CP3 of the Wokingham Borough CS similarly requires development to be of an appropriate scale, form and layout, and to avoid unacceptable impacts on the amenities of neighbouring occupiers. The policy supports development that makes effective use of land where it is well-designed and integrated within its surroundings.
- 6.2.4 The BDG provides supporting guidance on the application of these principles, including consideration of separation distances, outlook, privacy and massing. The guidance is intended to be applied flexibly, having regard to the characteristics of the Site and its context, particularly within established and previously developed areas.

The Appellants Response

- 6.2.5 The Appellant does not agree with Refusal Reason 1 and considers that the impacts of the proposed development on neighbouring dwellings at Remenham Row have been materially overstated and is not supported by the Council's own officer assessment. When assessed



against the policy framework set out above, and taking full account of the Site context and existing built form, the proposal would not result in unacceptable harm to neighbouring amenity.

- 6.2.6 The Reason for Refusal cites section 12 of the NPPF but does not provide any specific paragraph of the NPPF. Having reviewed Chapter 12, the Appellant notes Paragraph 131 of the NPPF which makes clear that good design is fundamental to sustainable development and that development should be acceptable to communities.
- 6.2.7 Paragraph 135(c) of the NPPF states that decisions should ensure that developments “*are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)*”. In this context, the test is whether any impact on neighbouring amenity would be materially harmful, rather than whether the development would be visible or whether neighbouring residents would experience any limited alteration to existing views.
- 6.2.8 Policy CP3 of the Council’s CS requires development to be of an appropriate scale and to avoid detriment to neighbouring amenity. It does not require the preservation of existing views or the avoidance of all changes to outlook. The proposal responds positively to these criteria by integrating within its context, using the full potential of a previously developed Site and mitigating impacts through layout.
- 6.2.9 The Site forms part of an established cluster of buildings associated with the Thamesfield Retirement Village. There is substantial built form already in close proximity to Remenham Row, and the proposal represents the replacement of an existing building within that established cluster, rather than the introduction of development into an open or undeveloped area. The Site, located within the existing developed envelope. It was accepted at Officer level that the scale and positioning of the new building represent a contained and proportionate form of redevelopment within a visually perceived built-up area (Committee Report paragraphs 3.51)
- 6.2.10 Regarding overlooking and privacy, the Council’s concern regarding overlooking and loss of privacy is overstated and not supported by the evidence. The proposed building would be positioned at a diagonal relationship to the dwellings at Remenham Row with the vast majority of the extension being set back from the existing building line within the retirement village. Separation distances and building orientation are typical of developed village environments and previously developed sites.
- 6.2.11 Regarding separation distance, the BDG is guidance rather than policy and is intended to be applied flexibly, having regard to site-specific circumstances. The BDG sets out the reasonable levels of privacy and amenity at Section 4.7 (Privacy, visual impact and amenity) nothing that “*The design of windows, balustrades, landscape in gardens and boundary treatments can all influence the potential for overlooking*” (R15, page 14). As set out in 4.3.3 of this Statement of



Case, balconies on the first and second floors were replaced with Juliet balconies, and the buildings roof receded during determination which minimises the impact of overlooking.

- 6.2.12 R15 (page 47) of the BDG sets out a table with the recommended separation distances for maintaining privacy distinguishing the front-to-front, back-to-flank, and back-to-back recommended distances. In the context of this proposal, which is above two stories, the guidance advises on separation distances of 15 metres for front-to-front and 30 metres for back-to-back relationships. In this instance, the relationship between the proposed development and the dwellings on Remenham Row is best characterised as front-to-front, rather than back-to-back. This is because the proposed elevations face the front doors and front gardens of the properties on Remenham Row, as well as their associated parking and access arrangements. The back-to-back standard, which is intended to protect private rear garden environments and principal rear habitable room outlook, cannot accurately be applied to the relationship between Remenham Row and the Site. See below image (taken from Section 3.8, page 31 of the Design and Access Statement) of Remenham Row, which faces the proposal. It is clear from this image that the relationship with Remenham Row is unequivocally characterised as front-to-front with all Remenham Row properties clearly designed with a front door facing in the streetscape.



Remenham Row

- 6.2.13 The BDG further states that “*Schemes in more urban settings or with a more intimate character will often require a tighter, more compact layout*”. Although the Site is designated as countryside and Green Belt, it is already developed and operates as an established C2 use with a compact built form. The current character of the Site, including its enclosure by surrounding buildings and infrastructure, reflects a more intimate and contained environment. In this context, a tighter and more compact layout is not only acceptable but reflects the existing pattern of development on the Site and represents an effective use of land. This approach is accepted by the Officer at paragraph 8.4 of the Committee Report.

6.2.14 Table 2 below, sets out each property, the separation distance between the buildings, the BDG required separation distance (in this case 15 metres), and whether it is in compliance.

Table 2 – Separation distances from properties along Remenham Row

Property	Standard Utilised	Separation Distance (Building to building)	BDG Requirement	Compliance
No. 1 Remenham Row	Front-to front	C26m	15 metres	Yes
No. 2 Remenham Row	Front-to front	C23.4m	15 metres	Yes
No. 3 Remenham Row	Front-to front	C21.4m	15 metres	Yes
No. 4 Remenham Row	Front-to front	C24m	15 metres	Yes
No. 5 Remenham Row	Front-to front	C23.8m	15 metres	Yes

6.2.15 As seen on table 2 all 5 properties on Remenham Row comply with the BDG guidelines and exceed the required 15 metre separation distance.

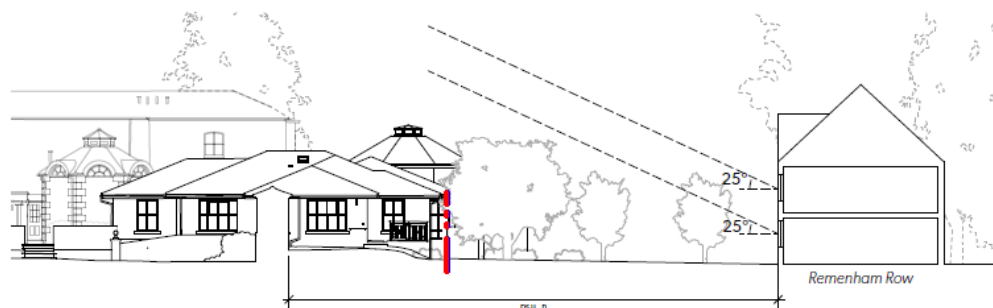
6.2.16 Should the Inspector take a different view and conclude that the relationship to dwellings on Remenham Row is more akin to a back-to-back relationship (where guidance indicates a 30 metre separation distance), it is considered that that this would be a minor level of harm at most in the overall planning balance. Any departure from separation distances guidelines would not introduce a materially different relationship from that which already characterises the Site and its surroundings and would therefore amount to no more than a minor and localised impact, insufficient to outweigh the significant public benefits of the proposal. In this context, the angle between the closest Remenham Row façade to the Site and that of the proposed building should also be considered. This is an oblique angle such that any views would not be directly parallel which further mitigates and perception of overlooking or loss of privacy.

6.2.17 As acknowledged within the Committee Report, perceived overlooking can arise even where guidance is met, particularly in compact, developed environments, and does not, of itself, equate

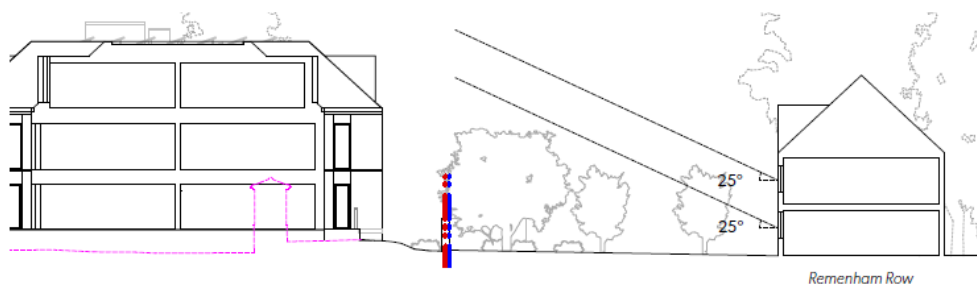


to unacceptable harm. In this case, that conclusion is reinforced by the established C2 use of the Site, the institutional character and density to the existing retirement village, and the fact that the Site is surrounded by built development and was accepted by officers to lie within a visually perceived built-up area (Committee Report, paragraph 3.51).

- 6.2.18 In terms of the development having an overbearing impact, the majority of the proposed building is set back behind the established building line and does not project towards Remenham Row. The sole exception is a limited element at the northern end of the extension, which marginally extends beyond the existing building line. A comparison of the existing footprint and proposed can be found at section 3.1 of the DAS. However, this projection is small in scale and localised within the current built envelope, which does not materially alter the overall relationship with the dwellings on Remenham Row.
- 6.2.19 In this respect, the proposal is sympathetic to the surrounding built environment, consistent with paragraph 135(c) of the National Planning Policy Framework, which seeks development that responds positively to local character while not preventing appropriate innovation or increased density where suitable.
- 6.2.20 Whilst the views may change to the front elevation of Remenham Row, with the adequate separation distances being met, this would not cause a significant overbearing impact. Visuals



Existing Section B-B Remenham Row



Proposed Section B-B Remenham Row and Proposed New Block

illustrating the separation distances between the proposed development and Remenham Row are provided at Section 3.1 (pages 19–20) of the DAS, with proposed sections showing the relationship with Remenham Row set out at Section 3.16 (page 39, and as seen below) (ref: 2221-R-014 Rev 02).

- 6.2.21 The Officer concluded that any limited neighbouring amenity impacts were outweighed by the ‘*substantial*’ public benefits of the proposal, including the delivery of much-needed specialist accommodation for older people in a location where there is an identified shortfall. The proposal was recommended for approval, with amenity impacts taken into account as part of the overall planning balance.
- 6.2.22 When considered in the round, any limited impacts on neighbouring amenity are clearly outweighed by the substantial benefits of the scheme – detailed commentary in relation to this is set out within the Planning Balance section below.
- 6.2.23 For the reasons set out above when assessed against the proper policy tests in Section 12 of the NPPF, Policy CP3 of the Core Strategy and the Borough Design Guide, the proposal would not result in material harm to the living conditions of neighbouring residents and Reason for Refusal 1 is therefore not justified.

6.3 Refusal Reason 2

The proposed development, by reason of its scale, height, bulk and massing would fail to preserve or enhance the character or appearance of the Remenham and Henley Bridge Conservation Area and the Henley on Thames Conservation Area. This would result in limited-moderate less-than-substantial harm to the significance of these designated heritage assets. When applying paragraph 215 of the National Planning Policy Framework, the identified harm is not outweighed by the public benefits of the proposal. Accordingly, the proposal conflicts with the statutory duty under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16 of the NPPF (2024), Policy CP3 of the Wokingham Core Strategy and Policy TB24 of the Managing Development Delivery Local Plan.

Council's Case

- 6.3.1 The Council's case in relation to Reason for Refusal 2 is that the proposed development, by virtue of its scale, height, bulk and massing, would fail to preserve or enhance the character or appearance of the Remenham and Henley Bridge Conservation Area (within which the Site is located) and the Henley-on-Thames Conservation Area (to the west of the Site on the opposite side of the River Thames).



- 6.3.2 The Council's decision contends that the size and form of the proposed building would result in a harmful visual impact on the setting and townscape character of these designated heritage assets, giving rise to a level of limited-moderate less-than-substantial harm to their significance. In applying paragraph 215 of the National Planning Policy Framework, the Council's position is that this identified harm is not outweighed by the public benefits of the proposal. As a consequence, the Council considers that the statutory duty under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 has not been met, and that the proposal conflicts with Section 16 of the NPPF (2024), Policy CP3 of the Wokingham Borough Core Strategy and Policy TB24 of the Managing Development Delivery Local Plan.

Policy Context

- 6.3.3 Section 16 of the NPPF sets out the Government's approach to conserving and enhancing the historic environment. Paragraph 215 of the NPPF states:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

- 6.3.4 At the local level, Policy CP3 of the Wokingham Borough CS requires development to be of a high quality of design that responds positively to local character, including heritage assets and their settings, and avoids unacceptable harm. Policy TB24 of the MDD Local Plan provides more specific guidance in relation to heritage assets, requiring development within or affecting Conservation Areas to preserve or enhance their character or appearance, while allowing for appropriate development where impacts are carefully assessed and justified.

The Appellants response

- 6.3.5 The Appellant refutes Refusal Reason 2 in relation to heritage impact and considers that the extent of harm identified is overstated and, in line with the Appellants Built Heritage Statement (BHS) (ref: JCH01522 v3, dated September 2025), where there is no harm to the character and appearance of Henley Conservation Area and Remenham Henley Bridge Conservation Area.
- 6.3.6 Within Reason for Refusal 2 the Council states that any impact on the Remenham and Henley Bridge Conservation Area and the Henley-on-Thames Conservation Area would fall within the category of *“limited-moderate less than substantial harm”*. It is well established that less-than-substantial harm does not itself justify refusal. Paragraph 215 of the NPPF requires decision-makers to weigh such harm against the public benefits of the proposal, rather than treating it as determinative.

- 6.3.7 The potential effects of the proposals on the Conservation Areas have been assessed in the Built Heritage Statement (BHS) with impacts on the Remenham Henley Bridge and Henley-on-Thames Conservation Area assessed separately at sections 4.6 and 4.7 of the BHS.
- 6.3.8 With regard to the Henley Conservation Area, the assessment confirms that the proposed development would only be visible in filtered views from a limited part of the western riverbank. For visual illustration, figure 3 within the Committee Report shows a CGI of the proposal from the Henley Thames Riverbank. The assessment confirms that that the scheme would not alter the character as experienced from within the Conservation Area, nor would it undermine the contribution the Site makes to its setting. As such, it was concluded that the proposals “*cause **no harm** to its significance; its special architectural and historic interest will be preserved [emphasis added]*” (Paragraph 4.6 of BHS).
- 6.3.9 In relation to the Remenham Henley Bridge Conservation Area, paragraph 4.7 of the BHS highlights that views of the Site are largely confined to the west and south-west, mainly within the Site’s grounds, not harming the character of Thamesfield. Furthermore, the replacement of the existing neutral to negative 1990s development with a well-considered building and enhanced landscaping would maintain the character of those parts of the Site that contribute positively to the Conservation Area. The assessment concludes that “*the proposed development will cause **no harm** to the character and appearance of the Remenham Henley Bridge Conservation Area*” (Paragraph 4.7 of BHS).
- 6.3.10 For completeness, we also reference the assessment within the Built Heritage Statement to impact upon Listed Buildings. Listed buildings were discounted from further assessment within the BHS due to them being wholly screened by dense planting, mature trees and built development, and therefore the proposed development would have no impact on listed buildings. This is set out at paragraphs 3.13 - 3.15 of the BHS.
- 6.3.11 Taken together, this demonstrates that the proposals would preserve the significance, character and appearance of both Conservation Areas, with the assessment within the Built Heritage Statement submitted with the application concluding ‘**no harm**’. In this context, it is the Appellant’s case that NPPF paragraph 215 would not be engaged as there is no harm arising and therefore, nothing to outweigh with public benefits.
- 6.3.12 Notwithstanding the Appellant’s position of “no harm” to heritage assets, and Reason for Refusal 2 indicating “*limited-moderate less than substantial harm*”, the Council confirm in their assessment “*this harm is not outweighed by the public benefits of the proposal*”. This Reason for Refusal is at odds with both the level of harm assessed within the Wokingham Built Heritage Officer response and the assessment of harm against public benefits contained within the Committee report.

- 6.3.13 Wokingham's Built Heritage Officer response (dated 03/10/2025) recommended an objection to the application on the basis that their professional judgement was that the scheme would give rise to less than substantial harm to the significance of the Remenham Henley Bridge Conservation Area and to a lesser extent, the Henley-on-Thames Conservation Area. The objection did not identify any instance of "*limited-moderate less than substantial harm*" as relied upon within Reason for Refusal 2. The Heritage Officer's assessment did not extend to identifying whether harm was outweighed by public benefits in line with paragraph 215 of the NPPF, as this is a planning assessment to be undertaken by the Planning Officer. This assessment is contained at paragraph 17.3 of the Committee Report where the Officer concludes that the public benefits associated with the proposal collectively outweigh the less than substantial harm raised by the Council's Built Heritage Officer.
- 6.3.14 In the event that the Inspector, as decision maker, agrees that there would be a limited level of less than substantial harm, or "limited-moderate level" as per the reason for refusal, the public benefits will need to be weighed against this in line with paragraph 215 of the NPPF.
- 6.3.15 When applying paragraphs 215 of the NPPF, the substantial public benefits clearly outweigh any "*limited-moderate less than substantial harm*" harm identified. These include the delivery of much-needed specialist Extra Care accommodation for an ageing population, the intensification and long-term viability of an established Integrated Retirement Community, the efficient reuse of previously developed land, biodiversity net gain, sustainability and energy efficiency improvements, and significant social and health benefits associated with purpose-built accommodation that supports independent living.
- 6.3.16 The Appellant relies on the conclusions of the submitted BHS which demonstrates that the effects on the Conservation Area are limited in filtered views and do not undermine the Conservation Areas' significance, resulting in **no harm**. On this basis, paragraph 215 of the NPPF is not engaged.
- 6.3.17 Accordingly, Reason for Refusal 2 is therefore not justified and should not be upheld.

6.4 Refusal Reason 3

In the absence of a completed legal agreement, the proposed development fail to secure opportunities for training, apprenticeships and other vocational initiatives to develop local employability skills contrary to MDD Local Plan policy TB12.

Policy Context

- 6.4.1 Policy TB12 requires major development proposals to include an Employment and Skills Plan demonstrating how the development will provide opportunities for training, apprenticeships or other vocational initiatives. The purpose is to help develop local employability skills linked to the needs of developers, contractors or end users associated with the proposal.



The Appellants response

- 6.4.2 The Appellant does not dispute that, at the time of determination, a completed legal agreement had not been executed. However, the Appellant considers that Refusal Reason 3 relates solely to the mechanism for securing obligations, rather than to the acceptability of the development itself
- 6.4.3 As set out in the Committee Report, the principle of securing employability and skills initiatives in accordance with Policy TB12 was accepted by Officer. Heads of Terms for a Section 106 Agreement, including an obligation to secure local training, apprenticeship and employability opportunities during the construction phase, had been agreed in principle and were reported to Committee.
- 6.4.4 A completed Section 106 Agreement accompanies this appeal. The Agreement includes a specific obligation to deliver an Employment and Skills Plan in accordance with Policy TB12 of the Managing Development Delivery Local Plan.
- 6.4.5 In these circumstances, the matter giving rise to Refusal Reason 3 has been fully addressed and the reason for refusal no longer applies.

6.5 Refusal Reason 4

In the absence of a completed legal agreement, the proposed development fails to mitigate the increases in demand on NHS services through failing to contribute towards the creation of additional clinical capacity at Bell or Hart GP Surgeries or an identified primary care estates project in the local area to serve the development. This is contrary to CP1 of the Core Strategy and the NPPF (2024).

Policy Context

- 6.5.1 Policy CP1 requires development to be supported by appropriate infrastructure, including healthcare provision, and to mitigate its impacts on local services. This includes ensuring that new development contributes towards the provision or enhancement of infrastructure where necessary to address additional demand arising from the proposal. The policy does not preclude development but requires that any impacts are appropriately mitigated through planning obligations where required.

The Appellants Response

- 6.5.2 The Appellant does not dispute the principle of contributing towards additional primary healthcare capacity to mitigate the impact of the development. The absence of a completed agreement at the time of determination was a matter of timing rather. As acknowledged in the Committee Report, the requirement for a healthcare contribution was identified and agreed in principle, and Heads of Terms for a Section 106 Agreement were reported to Committee. A



completed Section 106 Agreement has now been submitted with this appeal. It secures a financial contribution towards the provision of additional clinical capacity at Bell or Hart GP Surgeries, in accordance with the requirements of Policy CP1.

- 6.5.3 The matter giving rise to Refusal Reason 4 has been fully addressed and the reason for refusal no longer applies.

6.6 Refusal Reason 5

In the absence of a completed legal agreement to secure biodiversity net gain monitoring, the proposed development fails to demonstrate and secure that there would be no long term biodiversity net loss as a result of the proposal by either on site mitigation or off-site compensation and how this would be managed, contrary to Core Strategy Policy CP3 and CP7, MDD Local Plan Policy TB23 and the NPPF (2024).

Policy Context

- 6.6.1 Core Policy CP3 requires development to avoid resulting in unacceptable harm to important ecological features, habitats or protected species.
- 6.6.2 Core Policy CP7 seeks to conserve and enhance biodiversity and permits development where any potential ecological impacts can be satisfactorily avoided, mitigated or compensated for, having regard to the need for the proposal and the effectiveness of the mitigation measures.
- 6.6.3 Policy TB23 From the Wokingham Managing Development delivery document requires development proposals to incorporate appropriate mitigation, buffer zones, biodiversity enhancements and measures to maintain ecological connectivity.
- 6.6.4 This mitigation can be secured through an appropriate planning obligation.

The Appellants Response

- 6.6.5 The Appellant does not dispute the need to enter into a legal agreement to secure biodiversity net gain monitoring as part of their commitment to deliver the required biodiversity net gain in accordance with national and local policy. As with Refusal Reasons 3 and 4, the matter raised does not relate to any inherent deficiency in the proposed development, but to the absence of a completed legal agreement at the point of determination.
- 6.6.6 As acknowledged in the Committee Report, the requirement for BNG monitoring is agreed in principle, and included within the Heads of Terms for a Section 106 Agreement as reported to Committee. A completed Section 106 Agreement has been submitted with this appeal.
- 6.6.7 Accordingly, Refusal Reason 5 has been fully addressed and the reason for refusal no longer applies.



7 Other Material Considerations

Presumption in Favour of Sustainable Development

7.1.1 Paragraph 10 of the NPPF states “So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11)”.

7.1.2 Paragraph 11(d) sets out that for decision-taking, this means that where policies for determining the application are out of date(8), granting planning permission unless:

I. The application of Policies in the Framework that protect areas or assets of particular importance(7) 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 whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination(9).

7.1.3 Footnote 8 provides guidance for the circumstances in which the ‘tilted balance’ in paragraph 11(d) is engaged for decision taking. This includes applications involving the provision of housing situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78). As per paragraph 4.8.1 above, WBC’s housing land supply position is 2.5 years. This position is acknowledged within the Committee Report at paragraph 3.49, which confirms that the Council is unable to demonstrate a five-year supply of deliverable housing land. As a consequence, the presumption in favour of sustainable development under paragraph 11(d) of the Framework is engaged and decision-taking must proceed under the ‘tilted balance’.

7.1.4 The list provided at footnote 7 of areas and assets of particular importance which could disengage the ‘tilted balance’ includes “land designated as Green Belt”, “designated heritage assets” and “areas at risk of flooding” which are relevant to the appeal Site. These are addressed in turn below:

- **Green Belt** : For the reasons set out within paragraphs 6.3.10-6.3.31 of the Planning Statement, agreed within paragraphs 3.4-3.23 of the Committee Report, and further assessed at paragraphs 7.1.6-7.1.27 of this Statement below, the development does not represent inappropriate development within the Green Belt. In the event that the Inspector, as decision maker, does not agree with this conclusion, in the alternative we consider ‘very special circumstances’ exist as set out at paragraphs 6.3.34 – 6.3.70 of



the accompanying Planning Statement, and paragraphs 7.1.28-7.1.30 below. On this basis, Green Belt does not represent a strong reason for refusal for the purposes of paragraph 11(d) of the NPPF and footnote 7 and does not disengage the tilted balance.

- **Designated Heritage Asset:** Although the proposal has the potential to impact upon designated heritage assets, as set out within the above response to Reason for Refusal 2 the Appellant's position is the proposal would not result in any harm to these designated heritage assets. As such, paragraph 215 would not be engaged and heritage would not represent a strong reason for refusal. In the event the Inspector, as decision maker, comes to a different view and assesses that there would be some less than substantial harm, this harm is demonstrably outweighed by the public benefits associated with the proposal. As such, heritage would not provide a strong reason for refusal or disengage the tilted balance. This is supported by the Officer's assessment within the Committee Report which expressly concludes that the identified less-than-substantial heritage harm is not sufficient to disengage the 'tilted balance' and must be weighed against the public benefits of the proposal in accordance with paragraph 215 of the NPPF (Committee Report para 5.9).
- **Areas at Flood Risk:** Whilst parts of the appeal Site lie within Flood Zones 2 and 3 and are therefore relevant for the purposes of footnote 7 of the NPPF, flood risk matters have been comprehensively addressed within the submission. The submitted Flood Risk Assessment demonstrates that the development will be safe for its lifetime, will not increase flood risk elsewhere, and incorporates mitigation and betterment through SuDS and reduced impermeable surfacing. This is agreed within the Committee Report at paragraph 7.29. As such, flood risk does not represent a strong reason for refusal and would not disengage the 'tilted balance'.

7.1.5 As such in accordance with Paragraph 11(d) and in full consideration of relevant parts of footnote 7, the 'tilted balance' remains engaged and planning permission should be granted unless any adverse impacts of doing so would "*significantly and demonstrably*" outweigh the benefits.

Assessment against Green Belt Policy

7.1.6 Paragraph 142 of the NPPF sets out that Government attaches great importance to Green Belts, with the fundamental aim of Green Belt policy to prevent urban sprawl by keeping land permanently open; and the essential characteristics of Green Belts are their openness and their permanence. Paragraph 153 then sets out that in considering planning applications, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. As per footnote 55 however, this is "*Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate.*"



- 7.1.7 Under the current development plan, the Site is designated Green Belt. The NPPF states that development in the Green Belt is inappropriate unless the exceptions at paragraph 154 apply or where the criteria at paragraph 155 are met.
- 7.1.8 Paragraph 154(g) of the NPPF allows for the partial redevelopment of previously developed land where the proposal would not have a greater impact on the openness of the Green Belt than the existing development. The Appellant's case for compliance with NPPF paragraph 154(g) is set out in detail within paragraphs 6.5 - 6.3.17 of the Planning Statement. The Committee Report agrees that the proposal meets the requirements of paragraph 154(g) and is therefore to be regarded as not inappropriate development in the Green Belt (Committee Report, para 3.12).
- 7.1.9 The application submission was prior to the December 2024 NPPF update and, as such, did not include consideration against grey belt. As such, for the purposes of this appeal and for completeness, we include consideration of the proposal against national grey belt policy below.
- 7.1.10 Paragraph 155 of the NPPF states:

The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

b. There is a demonstrable unmet need for the type of development proposed;

c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework;

d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.

- 7.1.11 We consider the Site against each criterion of paragraph 155 in turn below.

Part (a) - The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

- 7.1.12 Grey Belt' is defined at Annex 2 (Glossary) of the NPPF as land in the Green Belt comprising previously developed land, and/or any land that, in either case, does not strongly contribute to any of purposes (a), (b) or (d) in paragraph 143, namely:

A) To check the unrestricted sprawl of large built-up areas;

B) To prevent neighbouring towns merging into one another;



D) To preserve the setting and special character of historic towns

7.1.13 The Site has been assessed against purposes (a), (b) and (d) of paragraph 143 of the NPPF, with reference to the Planning Practice Guidance on Grey Belt land (Paragraph: 005, Reference ID: 64-005-20250225);

Table 3 - Assessment against Green Belt Purposes

Green Belt Purpose (NPPF para. 143)	Planning Practice Guidance (Paragraph: 005 Reference ID: 64-005-20250225)	Assessment
(a) To check the unrestricted sprawl of large built-up areas	The PPG notes that: <i>"This purpose relates to the sprawl of large built up areas. <u>Villages should not be considered large built up areas.</u>"</i>	Based on the PPG guidance, this is not relevant to the Site as Remenham is a Village. However, in any case, the proposal does not extend the built-up area of henley and is located within an area surrounded by buildings on previously developed land.
(b) To prevent neighbouring towns merging into one another	The PPG states that the purpose relates <i>to merging of towns, <u>not villages.</u></i>	Based on the PPG guidance, this is not relevant to the Site as Remenham is a Village. However, the Site is already enclosed by built form, and the proposed development comprises the redevelopment on previously developed land. The proposal would not cause the merge of two towns.
(d) To preserve the setting and special character of historic towns	The PPG states that <i>the purpose relates to historic towns, <u>not villages.</u> Where there are no historic towns</i>	Based on the PPG guidance, this is not relevant to the Site as Remenham is a Village.

	<i>in the plan area, it may not be necessary to provide detailed assessments against this purpose.</i>	However, given the nature of the proposal between existing built form, the proposal would not strongly detract from the special character and setting of historic towns given its nature between existing built form with views only appreciable from one viewpoint across the River Thames.
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7.1.14 The final of paragraph 155(a) requires that development would “*not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan*”. Given that the development is limited in scale, relates to previously developed land and is bound on 4 sides by existing built form, the development would not undermine the purposes of the remaining Green Belt across the area of the plan. On this basis, criterion 155(a) is satisfied.

Part (b) There is a demonstrable unmet need for the type of development proposed

7.1.15 Footnote 56 of the NPPF confirms that, for the purposes of paragraph 155(b), ‘*demonstrable unmet need*’ may include circumstances where the local planning authority is unable to demonstrate a five-year supply of deliverable housing sites (including any relevant buffer), or where the Housing Delivery Test result has fallen below 75% of the identified housing requirement over the previous three years.

7.1.16 In this case, the Council is unable to demonstrate a five-year supply of deliverable housing sites, only providing 2.5 years, this is a position confirmed by the Officer in the Committee Report.

7.1.17 There is a pressing need for specialist housing for older people from a National Level. The Planning Practice Guidance Housing for Older and Disabled People provides expanded guidance of direct relevance to the appeal proposal. Under the heading “Why is it important to plan for the housing needs of older people?”, the PPG states that “*the need to provide housing for older people is critical*”, noting significant growth in the older population and emphasising the role that appropriate housing plays in supporting independent living, community integration and reducing pressures on health and social care services (PPG, Paragraph 001, Reference ID: 63-001-20190626).

7.1.18 The PPG further advises that “*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). This guidance directly supports the provision of Integrated Retirement Communities, such as the proposal, which are specifically designed to meet the evolving needs of older people.

- 7.1.19 At a local level the Council's 2023 Local Housing Needs Assessment identifies a substantial shortfall of specialist older persons' accommodation, with at least 857 additional rented units required by 2040 after accounting for recent permissions. The Officer confirms in the Committee Report that the appeal proposal directly addresses this identified shortfall and represents a clear benefit in meeting both local and national priorities for older persons' care (Committee Report, paragraphs 3.46–3.47).
- 7.1.20 These national policy considerations align with the Council's assessment, the Officer identifies a substantial shortfall in specialist older persons' accommodation and confirms that the proposal directly responds to that need (Committee Report, paragraphs 3.47). Taken together, the inability to demonstrate a five-year housing land supply and the "critical" need for older persons' in the borough, provide a compelling case of a demonstrable unmet need for the type of development proposed, consistent with the requirements of paragraph 155(b) of the NPPF.

Part (c) - The development would be in a sustainable location

- 7.1.21 Turning to criterion (c) of paragraph 155 of the NPPF, the appeal proposal is located in a sustainable location when assessed with particular reference to paragraphs 110 and 115 of the NPPF. This conclusion is shared by the Case Officer at paragraph 3.21 of the Committee Report.
- 7.1.22 The appeal Site is located within Remenham, a small village containing established residential development, including Thamesfield Retirement Village and Remenham Row retirement properties, alongside a range of community and recreational facilities such as the Little Angel public house, Henley Cricket Club, the Eyot Centre and the Leander Club. Importantly, the Site lies directly opposite the market town of Henley-on-Thames which is identified in South Oxfordshire's Development Plan as a Market Town capable of supporting sustainable patterns with a range of facilities and services.
- 7.1.23 The Site is approximately 300 metres from Henley Bridge, providing direct pedestrian and cycle access into Henley-on-Thames. As confirmed within paragraphs 2.5 – 2.7 of the Transport Assessment (Ref: 2208-036/TS/01, dated November 2024) it is practical and realistic for residents and staff to walk or cycle into the town centre, where a wide range of shops, services, healthcare facilities and employment opportunities are available.
- 7.1.24 In addition, Henley railway station is located approximately 1 kilometre from the Site and provides rail services to Reading and London via Twyford. In addition, the sustainability of the Site is further enhanced by the on-site facilities provided within the existing Integrated



Retirement Community, including a dining room, residents' bar lounge and hairdresser, which reduce the need for residents to travel off-site for day-to-day needs.

- 7.1.25 In these circumstances, and notwithstanding the Site's designation as countryside, it is concluded that the proposal represents sustainable development for its intended use. This assessment properly reflects paragraphs 110 and 115 of the NPPF, which recognise that opportunities to maximise sustainable transport will vary between urban and rural areas and should be taken into account in decision-making. The Appellant agrees with the Officer's assessment and considers that criterion 155(c) is satisfied.

Part (d) - Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.

- 7.1.26 Part d of paragraph 155 is not considered applicable to the development as, whilst the development constitutes major development by virtue of the number of units proposed, it comprises C2 specialist Extra Care accommodation and does not include market housing. Consequently, there is no development plan requirement for the provision of affordable housing, and criterion 155(d) is not engaged. This is consistent with the Council's approach within the Committee Report (paragraph 3.22).

Summary

- 7.1.27 As set out above, the development satisfies the provisions of NPPF paragraph 155 and, as such, complies with grey belt policy and represent an exception to inappropriate development in the Green Belt.
- 7.1.28 The Committee Report also agrees with this assessment and that the development is not inappropriate by reason of compliance with national grey belt policy (Committee Report paragraphs 3.13 3.23)

Very Special Circumstances (VSC)

- 7.1.29 As set out above, the Appellant's position is that the development complies with two separate national policy exceptions to inappropriate development in the Green Belt (i.e. paragraphs 154(g) and 155). This position is understood to be agreed by the Council given the assessment contained within the Committee Report and given that no reasons for refusal relate to Green Belt. Notwithstanding this, should the Inspector as decision maker in the context of this appeal take a different position and determine that the development would represent inappropriate development in the Green Belt, the Appellant's case for 'very special circumstances' is set out below.
- 7.1.30 Paragraph 153 of the NPPF requires 'very special circumstances' to be demonstrated that clearly outweigh any perceived harm to the Green Belt where development in the Green Belt would be 'inappropriate'.



7.1.31 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 by reason of inappropriateness.

- i. The identified need for specialist housing for older people within an authority experiencing a substantial shortfall in specialist older persons' accommodation;
- 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.

Viability and retention of the IRC

7.1.32 The long-term financial viability of Thamesfield Village is highly dependent on increasing the number of units on so that the high operational costs can be shared across a larger resident base. The scheme has extensive communal areas and a staffing structure which is essential for safe and effective operation, but this also makes the site expensive to run.

7.1.33 The unprecedented inflationary period which followed the pandemic has put pressure on all operational businesses, and the care sector has been especially susceptible to this. The spike operating costs is largely attributed to increases in staff wages, routine building maintenance/labour, and building insurance. Staff wages are also exacerbated by mandatory uplifts in employers' national insurance contributions.

7.1.34 These operating costs are paid for through a conventional service charge, which when divided amongst only 37 homes, the cost per resident starts to become unsustainable. The proposed new development would dilute the running costs across more units, and the existing apartment owners would see an immediate reduction in their annual service charges.

7.1.35 Thamesfield village first opened in 1993 when running costs were comparably much lower. Since the pandemic, RVG has recognised the challenges of increasing running costs and amended its strategy so that future communities will be larger and more resilient to such increases.



- 7.1.36 In the case of Thamesfield, RVG has taken the unprecedented approach of buying back several units and subsequently offering them to rent. This approach has started to move the service charge burden away from residents and onto RVG as the landlord.
- 7.1.37 The ensuing rental model provides more flexibility and cost certainty for residents. However, the operator now absorbs more operational costs risk and the village has operated at a loss for the last 2 financial years. This loss has been absorbed by RVG who remain committed to resolving the financial pressures at the community. The operator believes that expansion is critical to achieving this.

7.2 Planning Balance

- 7.2.1 As established at paragraphs 7.1.1 – 7.1.5 of this Statement of Case, the Council is unable to demonstrate a five-year supply of deliverable housing sites. On that basis, the ‘tilted balance’ set out at paragraph 11(d) of the NPPF applies.
- 7.2.2 In accordance with Paragraph 11 (d)(i) policies relating to areas and assets referred to at footnote 7 relevant to the Site (Green Belt, designated heritage assets and flood risk) have been applied to the development. The application of policies relevant to these areas and assets do not provide any strong reason(s) for refusing the application. On this basis, the tilted balance remains engaged.
- 7.2.3 Paragraph 11 (d) (ii), directs the grant of planning permission unless any adverse impact of doing so would “*significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework as taken as a whole[...]*” and directs particular regard to key policies at footnote 9.
- 7.2.4 The adverse impacts of the proposal are as follows:
- **Heritage** – The Appellant maintains that the proposals would result in no level of heritage harm, as supported by the assessments within the Built Heritage Statement. On this basis, the heritage balance under paragraph 215 of the NPPF does not arise, since there is no harm to be weighed against public benefits. Nevertheless, should the Inspector take a different view, a moderate level of harm has been factored into this planning balance on a worst-case basis.
 - **The minor adverse impacts upon neighbouring amenity** – The Appellant recognises a limited level of harm which is clearly outweighed by the public benefits of the proposal (as required by NPPF Para 215), and this has been included within the Appellants planning balance assessment.
- 7.2.5 The benefits of the proposal are substantial and wide-ranging. These include a meaningful contribution to housing land supply through the net provision of 13 specialist C2 care



apartments, responding directly to an acknowledged and pressing need for high-quality accommodation for older people. A full list of benefits balanced against the adverse impacts of the proposal is set out below:

Table 4 – Planning Balance

Scheme Benefits		Adverse Scheme Impacts	
Benefit	Weight	Impact	Weight
The provision of housing within a borough, which is currently unable to demonstrate a five-year supply of deliverable housing land.	Very Significant	A less than substantial impact on Designated Heritage Asset (Remenham and Henley Bridge Conservation Area and the Henley on Thames Conservation Area.)	Moderate
Provision of 13 additional C2 units on an existing C2 Site within a LPA with a significant shortfall.	Very Significant	Minor adverse impacts upon neighbouring amenity	Limited
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.	Significant		
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	Significant		
Provision of development which makes effective use of land in line with NPPF paragraph 124 on a brownfield site.	Significant		

Development in a sustainable location adjacent to existing built form, which is well located for public transport connections and to promote sustainable travel	Significant		
Ensures the long-term retention of Thamesfield, with associated economic benefits including the safeguarding of existing jobs, and the retention of the IRC over the long term through improved financial viability.	Significant		
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	Moderate		
The creation of enhanced and new green infrastructure	Moderate		
Robust landscaping and planting proposals throughout the Site	Limited - Moderate		
Securing 10% Biodiversity Net Gain which will be secured via a S106 agreement.	Moderate		

7.2.6 When the adverse impacts the of the harms are balanced against the benefits as set out in table 4 above, it is evident that benefits significantly outweigh any harm. In the context the application



of paragraph 11d) ii. of the NPPF, it is evident that the limited adverse impacts identified could not begin to outweigh the substantial benefits, let alone “*significantly and demonstrably*”. On this basis, the planning balance tilts decisively in favour of the grant of planning permission.



8 Conclusion

- 8.1.1 This Statement of Case has been prepared by Stantec on behalf of the Appellant Retirement Villages Development Limited. It sets out the Appellant's case following the refusal to approve full application (ref: 243125).
- 8.1.2 The appeal proposal comprises the partial redevelopment of a previously developed and lawful extra-care retirement village to deliver additional specialist accommodation for older people. The Site lies in a sustainable location, within walking distance of Henley-on-Thames and is served by on-site facilities and public transport. The proposal represents an efficient and appropriate form of redevelopment within an established cluster of buildings and as accepted in the Committee Report, does not extend development into surrounding open countryside.
- 8.1.3 The Site lies within the Green Belt; however, it is a 'grey belt' Site as assessed by both the Appellant and the Council's Officers. The proposed development would also meet the tests of paragraph 155 and the scheme would therefore be appropriate development within the Green Belt under the terms of the NPPF.
- 8.1.4 In the alternative, should the Inspector conclude that planning permission cannot be granted under paragraph 155, very special circumstances exist. In the context of no five-year housing land supply and limited Green Belt harm, the substantial public benefits clearly outweigh any Green Belt harm.
- 8.1.5 The Appellant has demonstrated that **Refusal Reason 1** overstates the impact of the proposal on neighbouring amenity. When assessed against Section 12 of the NPPF, Policy CP3 of the Core Strategy and the Borough Design Guide, the proposal would not result in unacceptable overlooking, loss of privacy or overbearing impact. The Committee Report identified neighbouring amenity effects as limited and concluded that this did not justify refusal when assessed in the overall planning balance.
- 8.1.6 In relation to **Refusal Reason 2**, the Appellant has shown that both the extent of harm and the application of the paragraph 215 heritage balance have been overstated, as set out in the Appellants BHS, the proposal would not result in any harm to designated heritage assets.
- 8.1.7 **Refusal Reasons 3, 4 and 5** relate solely to the absence of completed planning obligations at the time of determination and do not go to the principle or acceptability of the development. A completed Section 106 Agreement has now been submitted with the appeal, securing:
- an Employment and Skills Plan in accordance with Policy TB12;
 - a healthcare contribution to mitigate additional demand on local GP services in line with Policy CP1; and



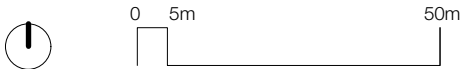
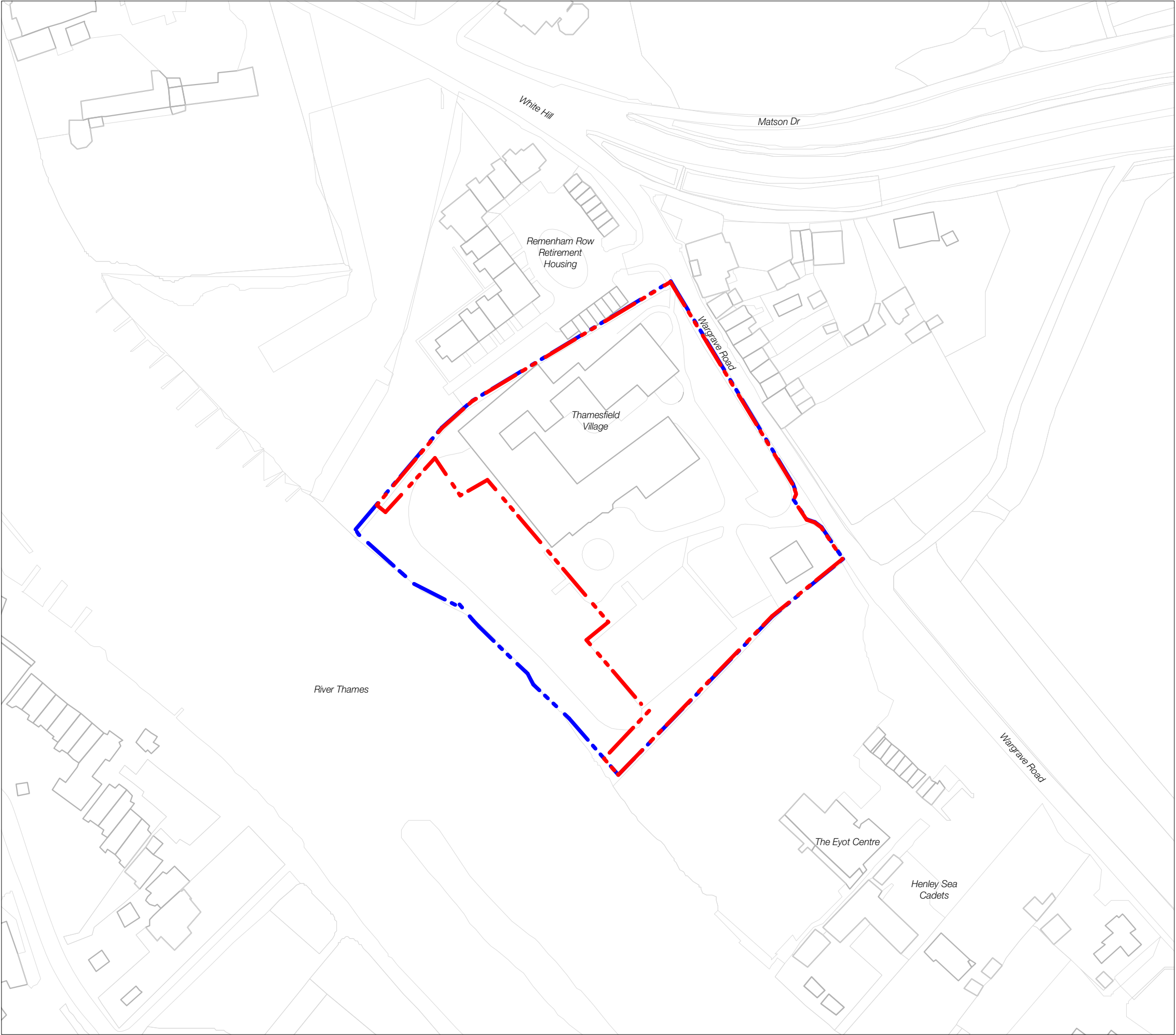
- mechanisms to secure and monitor biodiversity net gain in accordance with national and local policy.

8.1.8 For the reasons set out in this Statement of Case, The Appeal Development is therefore wholly consistent with the NPPF's objective of delivering sustainable development. In line with paragraph 11 (d) of the NPPF, the policies most important for determining the application are out of date, and, on the basis that the limited adverse impacts arising from the proposal do not significantly and demonstrably outweigh the benefits, planning permission should be granted.



Appendix A Site Location Plan





Notes

Do not scale for this drawing. Use written levels and dimensions only.

This drawing is to be read in conjunction with all other relevant documentation produced by Design Engine Architects Consultants and Sub-Contractors drawings, schedules and Specifications.

Key:

Site Application Boundary — · —

Ownership Boundary — · —

01	12/09/25	PLANNING ISSUE	KS	RRC
00	18/08/23	PLANNING ISSUE	KS	RRC
rev	date	notes	drawn	chkd

DESIGNENGINE
ARCHITECTS

project title Thamesfield	date of origin August 2023	scale 1:1250 @A3
client Retirement Villages Group	drawing title Site Location Plan	
status Stage 3	drawing reference 2212-P-001	revision 01

Appendix B Committee Report



Application Number	Expiry Date	Parish	Ward
243125	12/12/2025	Remenham CP	Thames

Applicant	Retirement Villages Development Limited
Site Address	Thamesfield Retirement Village, Remenham, RG9 2LX
Proposal	Full application for proposed part demolition of existing building and replacement with a three-storey extension to provide extra-care units, with associated soft and hard landscaping works; provision of additional vehicle parking, bin stores and ancillary structures; and alterations to existing basement.
Type	Full application
Officer	Benjamin Hindle
Reason for determination by committee	Listed by Cllr Wayne Smith

FOR CONSIDERATION BY	Planning Committee on 10 th December 2025
REPORT PREPARED BY	Assistant Director – Place

SUMMARY

The application before Members is a full planning application submitted by Retirement Villages Development Limited for the part demolition of an existing building at Thamesfield Retirement Village, Remenham, and its replacement with a three-storey extension to provide additional care apartments as a part of partial redevelopment of the northern edge of the site. The site lies within the Metropolitan Green Belt, designated countryside, and within the Remenham and Henley Bridge Conservation Area.

Thamesfield is an existing Integrated Retirement Community which provides self-contained homes for older people alongside on-site care, support, and shared facilities. Residents on site are able to live independently while accessing flexible care as their needs change, with on-call support staffing and managed communal spaces. Sitting between sheltered housing and care homes, they enable residents to “age in place” in a high-quality environment.

The proposal also incorporates associated enhancement landscaping providing ecological benefits, wider sustainability benefits saving circa 78% carbon emissions (related to the proposed built fabric), a well landscaped communal courtyard and outdoor amenity area, improved permeability and recreation for the wider site, additional vehicle parking, ancillary structures, and alterations to the existing basement.

The site comprises a substantial riverside retirement complex, including 38 care apartments, set within landscaped grounds adjacent to the River Thames. The original Thamesfield building is a Victorian mansion dating from circa 1875, altered and extended over time, and now recognised as a non-designated heritage asset. The wider site has evolved through piecemeal additions due to its multitude of former uses, resulting in a varied architectural vernacular.

The proposed extension would replace a single-storey care apartments and 7.3 metre orangery with contemporary 2.5/3 storey built form, providing 17 C2 apartments and representing a net increase of 13 apartments (13 dwelling contribution to housing land supply). The built form pursuant to the proposed redevelopment would measure between 9.9 and 11 metres in height, 33.6 metres in length, and 22 metres in depth, and would be set within the existing complex, heavily screened by vegetation and seen in the context of surrounding built form.

In terms of principle, the proposal falls outside defined settlement limits and therefore engages Core Strategy Policy CP11, which restricts development in the countryside. The scheme does not meet the specific exception criteria within CP11, but it does make use of previously developed land, does not result in settlement coalescence, and maintains the quality of the environment. Given the demonstrable need for specialist care accommodation in the Borough, and the Council's acknowledged housing land supply shortfall, the weight afforded to this technical conflict is reduced. The proposal is therefore acceptable in principle when considered against the Development Plan.

Turning to the Green Belt, the National Planning Policy Framework establishes that redevelopment of previously developed land may be appropriate where it does not cause substantial harm to openness, in this instance, the proposal would comply with the exception outlined in paragraph 154(g) and thus is appropriate development within the Green Belt.

The site further is considered to qualify as "Grey Belt" under the NPPF definition, being previously developed, contributing to demonstrable need, sustainably located and by making only a limited contribution to Green Belt purposes (a key test qualified within the Planning Practice Guidance).

The proposed extension would be located within the envelope of existing buildings, with only a modest increase in built form (4% GF footprint increase). Public views of the site are generally limited and well screened, and the development would be seen alongside the existing Integrated Retirement Community of comparable height. The Thamesfield mansion remains the dominant building from public views, and the proposed built form whilst taller, is well set back, of contemporary architectural merit and respects its setting, visually being received as an addition to the roofscape (unless viewed at an oblique angle from the riverside path in Henley, looking due south-east).

Whilst there is minor conflict with CP3(a) of the Core Strategy when viewed from one visual receptor point (Henley riverbank), this harm is limited and localised given the roof form proposed and how this interacts with the extended original mansion building. In terms of scale and mass, the proposal reflects modern design needs for high quality care and is viewed in the context of dense grain, including that of comparable bulk and height within the site itself and thus is of an appropriate scale of activity for the intended use. With the above in mind, Officers conclude that the proposal does not cause substantial harm to the openness of the Green Belt, nor stands at odds with the overarching aims of CP1 and CP3 of the Core Strategy, respectively.

Whilst less-than-substantial harm will arise from the development given its setting within the Remenham Henley Bridge Conservation Area, visibility from the Henley-On-Thames Conservation Area and connection to a non-designated heritage asset, overall, the value, setting and enjoyment of said assets are not significantly harmed. The proposal would result limited visual impact/ change from public viewpoints, particularly given the screening

provided by vegetation. The identified limited to moderate harm is insufficient to disengage the tilted balance, and officers consider the public benefits of the proposal (as identified above) notably outweigh the limited harms identified by WBC Built Heritage.

Highways and parking matters have been addressed by the applicant, with the provision of parking, cycle parking and electric vehicle charging considered adequate subject to conditions. The site is in a sustainable location, with bus stops served by a frequent services, a train station, and local services within an acceptable walking distance, meeting the requirements of Core Strategy Policy CP6 and MDD Policy CC07.

Neighbouring amenity is safeguarded, with no unacceptable overlooking or overshadowing arising from the extension. Whilst it is acknowledged that a degree of harm will arise from the proposal with respect to perceived overlooking and a degree of overbearing, this harm is not considered sufficient to demonstrably outweigh the benefits afforded by the scheme and reflects a 'compact' form of design, which is advocated by the National Design Guide to be at the benefit of the development's future occupants.

Ecology and drainage matters are satisfactorily addressed, with biodiversity enhancements proposed and a sustainable drainage strategy proposed including sufficient flood mitigation. The scheme also incorporates numerous energy efficiency measures, notably exceeding local and national requirements which contribute in combination to the wider viability and vitality of the Thamesfield Retirement Home. In this respect, the proposal constitutes highly sustainable development.

The limited infrastructure impacts arising from the proposal given its self-serving nature are mitigated through conditions and planning obligations, and an Employment Skills Plan will be secured in accordance with Policy TB12. Furthermore, a planning obligation has been secured to assist with an NHS capital project, notwithstanding the fact that a private Integrated Retirement Community such as the proposal benefit existing capacity in public healthcare by reducing strain on services.

The development contributes positively to specialist housing provision meeting an identified need and supporting the continued viability of the retirement village whilst providing five additional FTE roles to cater for future occupants.

When assessed in its entirety, the proposal delivers clear benefits including the provision of needed high-quality, specialist care accommodation, contribution to housing land supply, economic benefits from increased employment, local investment and business rates, development within a sustainable location and enhancements to landscaping and biodiversity. Against these benefits, the harms are limited to an in principle conflict with countryside policy, less than substantial harm on heritage grounds (low to moderate), localised harm from one visual public receptor in character terms, limited amenity impacts and a modest increase in built form within the Green Belt which results in no demonstrable harm. Officers conclude that the benefits outweigh the harms, and that the scheme is acceptable when assessed against the Development Plan and the NPPF as a whole.

Accordingly, the recommendation is that planning permission be granted, subject to conditions. The proposal represents appropriate development within the Metropolitan Green Belt, delivers much-needed specialist care accommodation in a sustainable location, and accords with planning policy when considered as a whole.

RECOMMENDATION

APPROVAL subject to conditions and informatives and the following Heads of Terms as agreed:

Employment and Skills Plan – Employment and Skills Plan or in lieu contribution to be agreed and provided.

Biodiversity Net Gain – Monitoring of the HMMP to ensure the BNG objectives are met over a 30-year period.

NHS Contribution – A payment of £15,405 to support local NHS capacity via investment in a capital project, prior to commencement of development.

OR;

That the committee delegate to the Head of the Head of Development Management to **REFUSE** full planning permission if the legal agreement is not completed within six **months** of the date of this resolution (unless officers on behalf of the Head of Development Management agree to a later date for completion of the legal agreement).

PLANNING STATUS

- Conservation Area – Remenham Henley Bridge
- Green Belt
- Countryside
- Flood Zones 2 and 3
- Bat Roost Habitat Suitability
- Tree Preservation Orders
- SSSI Impact Risk Zones
- Green Routes and Riverside Paths Consultation Zone
- Ordinary Watercourses Consultation Zone

RELEVANT PLANNING HISTORY

Application Number	Proposal	Decision
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
F/2003/9901	Proposed pitched roof bay window at first floor level, patio and two lift shaft enclosures to northeast and west elevations	Approved 10/10/2003
CLP/2003/0823	Application for Certificate of Lawful development for internal alterations to form four close care units	Approved 11/01/2004

F/2004/3605	Proposed infill extension to nursing home to improve facilities and alterations to laundry access	Approved 22/02/2005
192494	Application for certificate of lawfulness for the proposed replacement of nine old wooden arch topped windows and two doors with arched top lights and replaced with a UPVC window and door system designed to look as the same as the existing and to be used in a conservation area.	Approved 17/10/2019
222058	Application for a Certificate of Lawfulness for the proposed internal alterations to include communal facilities, ancillary facilities 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
222333	Full application for the proposed erection of first floor, side balcony, ground floor rear terrace, addition to and alterations to existing	Approved 11/10/2022

SUMMARY INFORMATION

For Residential

Site Area	0.91 ha
Existing units	4 (38 care apartments total on site)
Proposed units	17 (51 care apartments total on site)
Existing density – dwellings/hectare	42 care apartments per hectare (rounded up)
Proposed density –	56 care apartment per hectare (rounded up)
Previous land use	C2
Existing parking spaces	31
Proposed parking spaces	39

CONSULTATION RESPONSES

WBC Highways	No objection subject to conditions
WBC Trees and Landscape	No objection subject to conditions
WBC Sustainability	No objection subject to conditions
WBC Ecology	No objection subject to conditions/ obligation
WBC Drainage	No objection subject to conditions
The Environment Agency	No objection subject to conditions
WBC Environmental Health	No objection subject to conditions
Thames Water	No objection.
Integrated Care Board (NHS)	No objection subject to obligation
WBC Built Heritage	Objection – Less-than-substantial harm.
Historic England	Advice provided, concerns raised, though improvements in design/ massing noted.

REPRESENTATIONS**Town/Parish Council:**

Remenham Parish Council via their representative, AM2 has raised an objection to the application on the following grounds (as summarised):

- Impacts to the character and appearance of the area.
- Harms to the Green Belt arising from conflict with 154(c) (*Officer note: the proposal does not rely upon the provisions of paragraph 154(c) to be appropriate development, given the extent of the works and nature of the development, paragraph 154(g) is most appropriate*)
- Conflict with CP11(2) of the Core Strategy (*Officer note: CP11(2) cannot be viewed in isolation, and must be viewed in the context of CP11(1 and 3) by virtue of the word 'and' in between the exceptions. Thus, CP11(2) in the context provided is irrelevant for the purposes of determination*)
- Inappropriate increase in scale and volume.
- Parking concerns
- Neighbouring amenity concerns
- Harm to the Conservation Area, subsequent conflict with TB24.

Henley Town Council (outside of the Borough) raised concerns on grounds of overdevelopment and visual impact.

Local Members:

Objections have been received from Cllr Wayne Smith and Cllr Katrin Harding on the following grounds (as summarised):

- Impacts to the character and appearance of the area.
- Harms to the Green Belt
- Inappropriate increase in scale and volume.
- Harms to the Conservation Area from river viewpoint
- Neighbouring amenity concerns (overshadowing and loss of privacy)
- Contrary to CP11 of the Core Strategy (*Officer note: CP11(2) cannot be viewed in isolation, and must be viewed in the context of CP11(1 and 3) by virtue of the word 'and' in between the exceptions. Thus, CP11(2) in the context provided is irrelevant for the purposes of determination*).

Neighbours:

Throughout the application process, the submission has been subject to two 28-day consultation periods.

Within the first round of consultation dated 15/01/2025, objections were received by 33 residents, including an additional objection from a representative of Remenham Row.

Further to a full re-consultation dated 23/09/2025, objections were received 32 residents (repeat objectors), including an additional objection from a representative of Remenham Row. The outcome of both consultations are summarised as follows:

- Impacts to the character and appearance of the area.
- Harms to the Green Belt by way of inappropriateness
- Inappropriate increase in scale and volume
- Parking concerns
- Neighbouring amenity concerns
- Thamesfield as existing is overbearing to residents of Remenham Row
- Existing overdevelopment on the site

Other:

The Henley Society has raised an objection to the proposed development as summarised below:

- Harm arising to the character and appearance of the area
- Material palette out of accordance with surrounding vernacular
- Insufficient space for boundary landscaping
- Harm to neighbouring amenity, loss of privacy and overshadowing
- Insufficient need for the development.

PLANNING POLICY		
National Policy	NPPF	National Planning Policy Framework
	NPPG	National Planning Practice Guidance
	NDG	National Design Guide
Adopted Core Strategy DPD 2010	CP1	Sustainable Development
	CP2	Inclusive Communities
	CP3	General Principles for Development
	CP5	Housing mix, density and affordability
	CP6	Managing Travel Demand
	CP7	Biodiversity
	CP9	Scale and Location of Development Proposals
	CP11	Proposals outside development limits (including countryside)
	CP12	Green Belt

Adopted Managing Development Delivery Local Plan 2014	CC01	Presumption in Favour of Sustainable Development
	CC02	Development Limits
	CC03	Green Infrastructure, Trees and Landscaping
	CC04	Sustainable Design and Construction
	CC05	Renewable energy and decentralised energy networks
	CC06	Noise
	CC07	Parking
	CC09	Development and Flood Risk (from all sources)
	CC10	Sustainable Drainage
	TB05	Housing Mix
	TB07	Internal Space standards
	TB09	Residential accommodation for vulnerable groups
	TB12	Employment Skills Plan
	TB21	Landscape Character
	TB23	Biodiversity and Development
	TB24	Designated Heritage Assets
Supplementary Planning Documents (SPD) / other		Borough Design Guide – Section 4
Local Plan Update	SS1	Sustainable Development Principles
	SS2	Spatial strategy and settlement hierarchy
	SS5	Development in the countryside
	SS6	Development in the Green Belt
	CE1	Design principles for efficient buildings
	CE4	Supporting a circular economy
	CE6	Reducing energy consumption in existing buildings
	CE7	Low carbon and renewable energy generation
	C4	Green and blue infrastructure and public rights of way
	C5	Parking and electric vehicle charging
	ER4	Employment and Skills Plans
	FD1	Development and flood risk (from all sources)
	FD2	Sustainable drainage
	NE1	Biodiversity and geodiversity
	NE2	Biodiversity net gain
	NE4	Trees, woodland, hedges and hedgerows

	NE5	Landscape and design
	DH1	Place making and quality design
	DH2	Safeguarding amenity
	DH5	The historic environment
	HC5	Environmental protection
	HC8	Noise pollution
	HC10	Odor, fumes and dust

PLANNING ISSUES

The main matters to be considered are:

- Proposal Description
- Site Description
- Principle of Development
- Character of the Area
- Built Heritage
- Landscape Character and Arboricultural Matters
- Flooding and Drainage
- Neighbouring Amenity
- Highways
- Accessibility
- Internal Amenity
- Environmental Health
- Building Sustainability
- Ecology
- NHS and Healthcare
- Employment Development
- Planning Balance

Proposal Description:

- 1.0 The applicant seeks full planning permission for the erection of a 2.5/3 storey upward extension of an existing single storey care apartments within Thamesfield, on the north western edge of the site, along with associated landscaping, drainage and biodiversity benefits. This would create a total of 17 C2 apartments to complement the site's existing use the partial demolition of the existing building.
- 1.1 The proposal would sit between 9.9 and 11 metres in height, 33.6 metres in length and 22 metres in depth, utilising contemporary design to complement the site's existing varied vernacular in proposing highly sustainable development. The proposal would be located 7 metres away from the flank boundary, with views afforded from both Wargrave Road as well as Thameside Path in Henley.

Site Description:

- 2.0 The site comprises an expansive part two/part three storey Integrated Retirement Community within large grounds on the River Thames. The site as existing comprises

38 care apartments (use class C2), communal facilities, staff quarters, open space, ancillary structures and parking, benefitted from access off Wargrave Road. The area of the proposed redevelopment comprises of a single storey hipped roof style building and steep sided domed meeting room. The proposed development would deliver 17 C2 apartments with a net increase of 13 apartments, with a residual figure of 51 C2 apartments across the Integrated Retirement Community.

- 2.1 The site falls within the Remenham Henley Bridge Conservation Area and forms a part of the designated Green Belt, and the countryside although built development adjoins to the north, south and east with the river to the west. The Henley Bridge conservation area is located due north of the site, with views obliquely visible of the edge of the site from the Henley side of the river Thames.
- 2.2 The River Thames lies directly adjacent to the site's western boundary and the town of Henley on-Thames lies directly opposite the site with limited views looking onto the rear of the application site from this point.
- 2.3 Within the site, lies the Thamesfield non-designated heritage asset building (the original building). Thamesfield is a Victorian riverside mansion, of c1875, which was altered and enlarged in the late 19th century. The building was further altered and extended in the 20th century including changing function from a single residential dwelling to first a youth centre and subsequently a nursing home and retirement complex, of which it stands today. As the site has evolved, a mixed visual appearance has been developed reflecting various piecemeal new buildings and extensions over the years. In this respect, the site is not host to one fixed type of vernacular/ design and this is visually clear when viewing the site from visual receptor points from Wargrave Road, to the River Thames.

Principle of Development:

- 3.0 The starting point for decision making is the development plan. Section 70[2] of the Town and Country Planning Act 1990 & 38[6] of the Planning and Compulsory Purchase Act 2004 states that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case, the Development Plan consists of the Core Strategy 2010; MDD Local Plan 2014; and Central and Eastern Berkshire Joint Minerals and Waste Plan (Joint Plan) (2023) which are read alongside the NPPF (2024). The MDD Local Plan policy CC01 states that planning applications that accord with the policies in the Development Plan for Wokingham Borough will be approved without delay, unless material considerations indicate otherwise.
- 3.1 Policy CP9 of the Core Strategy and CC02 of the MDD Local Plan states that proposals will be permitted within development limits where the scale of the application reflects the facilities and services within the settlement. The development plan steers most developments to sustainable Major settlements with the best services, facilities and infrastructure. The definition of development limits recognises the consistent approach in planning to identify appropriate and sustainable areas for development.

Countryside

- 3.2 The site is located just outside of any defined settlement limits within designated

countryside as defined by Core Strategy CP9. Therefore, Core Strategy policy CP11 is engaged to assess the principle of development in this instance. Policy CP11 is a restrictive policy designed to protect the separate identity of settlements i.e. prevent settlement coalescence and to maintain the quality of the environment. Policy CP11 states that 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.

3.3 Parts 1),2) 3), 4), 5), 6) and 7) of CP11 are not applicable in this instance. While the development does not fall within any of the exceptions listed in the policy, the use of the site as an Integrated Retirement Community (C2) is already established, and no change of use is proposed. The scheme aligns with the underlying intent of CP11, as it represents the redevelopment of an existing Integrated Retirement Community that provides essential, but high quality care and accommodation for vulnerable members of the community as they age. The policy header refers to protecting the separate identity of settlements and maintaining the quality of the environment and this will be broadly achieved for the reasons set out further in this report. In this context, the proposal can be seen as broadly consistent with the policy's objectives.

Green Belt:

3.4 Paragraph 153 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraphs 154 and 155 of the NPPF outline exceptions that do not constitute inappropriate development in the Green Belt. Exception G of para 154 sets out the following development in the Green Belt is 'not inappropriate':

- 3.5 *g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.*
- 3.6 The proposal includes demolition of existing built form and the overall development can be considered to constitute the partial redevelopment of the northern edge of the site as opposed to a mere extension. This ties in with the wider redevelopment of the Thamesfield Retirement Village as the planning history shows in combination with internal alterations to form apartments, as opposed to simple care suites. In reference to exception (g) the proposal would not cause substantial harm to the openness of the Green Belt. It is relevant that the policy specifically refers to ‘substantial’ harm and not just any ‘harm’.
- 3.7 Whilst the development will be seen, it replaces existing built form and given the location of the extension building will be experienced in the direct and the immediate context of numerous larger buildings (including those of similar height) in every direction. The roof of the extension would be seen above the existing building but this would not obscure or impact the openness of the locality in any meaningful way. When viewed from the River Thames, the verdant backdrop of the landscape behind will still be apparent and it would not infringe on important views of the river. This consideration is set out further in Character and Landscape Section of this report.
- 3.8 Accordingly, with the above in mind, the proposed extension is considered to be appropriate development within the Metropolitan Green Belt by virtue of compliance with paragraph 154(g).
- 3.9 Third party objectors have referred to the proposal being considered under exception 154(c), which refers to *“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”*.
- 3.10 It is noted that the proposal would add to historic increases in GIA when considered again the size of the original building (amounting to a cumulative c6 times greater based on microfiche research from 1848- present). Much of this increase has been created by historic additions to the original building and the proposed development’s contribution to the uplift in built would be comparatively modest, equating to an **additional 7% in volume and 4% in GEA** (see table below):

	GEA GF Footprint Area (sqm)	Volume (m3)
Existing Building (Site)	2064	12828
Existing Building removed	530	5054
Proposed Building (Site)	2147	13775

Proposed Building	613	6001
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- 3.11 Undertaking a qualitative assessment of the proposed development under exception 154 (c), the proposal would sit behind the main frontage of the original building (when viewed from the River Thames) and given this important aspect is retained, the addition to the building is not inappropriate to the original building in the sense of resulting in a harmful disproportionate extension.
- 3.12 However, it must be noted that whether the proposal is disproportionate to the original building under exception 154(c) is a strictly irrelevant because it is considered to meet the requirements of exception 154 (g) which is the most applicable exceptions outlined within the NPPF.
- 3.13 In addition to the development falling within NPPF para 154(g), it would also meet the requirement of paragraph 155 as the site can be considered Grey Belt and the proposal would meet the Grey Belt policy requirements set out in the NPPF.
- 3.14 NPPF Paragraph 155 states:
- 3.15 *“The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:*
- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
 - b. There is a demonstrable unmet need for the type of development proposed;*
 - c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework...”*
- 3.16 With respect to criterion a) it is first important to consider whether the proposal would constitute development within the Grey Belt, as opposed to Green Belt. Annex 2 of the NPPF defines ‘Grey Belt’ as *“For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”*
- 3.17 The proposal is solely contained on previously developed land. Whilst there is a minor incursion of the proposed development into an informal garden and hardsurfacing tied with the existing use (thus falling within its curtilage), the developable area of the application site is considered to constitute entirely previously developed land, thus meeting the relevant test for ‘Grey Belt’.
- 3.18 Taking a cautious approach, the Planning Practice Guidance (PPG) was updated in February 2025 to provide clarity as to what constitutes a ‘strong’ contribution to Green Belt purposes A, B and D. This is then assessed using the decision makers planning judgement. Given the proposal’s location solely encapsulated by large buildings from every angle, it would not contribute moderately to preventing urban sprawl let alone

‘strongly’ contribute. Furthermore, given its location within an established site with no visual separation from adjoining buildings it would not cause neighbouring towns to merge as one, nor would it strongly detract from the special character and setting of historic towns given its nature between existing built form with views only appreciable from one viewpoint across the River Thames (with no reference to the site within any CA appraisal). Thus, it is reasonable to conclude that for the purposes of the NPPF, the application site (specifically the developable area) represents Grey Belt.

3.19 With the above in mind, relating closely to the site’s location within a built-up area and the presence of existing built form, the proposed development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. Accordingly, criterion 155(a) is met in every aspect.

3.20 Moving to criterion 155(b), the proposal is for 17 no. C2 units, of which there is demonstrable need in the borough with reference to the LHNA which outlines an LIN toolkit need of 857 rented units for older people (alleged to be higher by the applicant). The application would further contribute 17 dwellings (13 net) to the LPA’s housing land supply of which the LPA currently have a demonstrable shortfall. Accordingly, it is reasonable to conclude that there is a demonstrable unmet need for this type of development on two grounds.

3.21 Finally, turning to criterion 155(c), for the intended use, the proposal would represent sustainable development, expanding upon an existing site with abundant facilities for future occupants. Furthermore, it is noted that for more mobile future residents and intended employees, 2no. bus stops served by the ‘Good’ (as per CP6) 850 bus service are present within c13 metres and c58 metres of the application site respectively. A further 10 bus stops and a train station are within a 800 metre walk from the application site, as well as numerous shops, services, hospital and facilities within Henley. Thus, notwithstanding the fact that the site lays within the designated countryside, it is considered to be sustainable for the intended use with reference to paragraphs 110 and 115 of the NPPF which identify opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in decision-making.

3.22 With respect to criterion 155(d) it is noted that this does not apply to the proposal, as whilst it is a major development by virtue of units proposed, it is for C2 apartments (as to be secured by condition), not strictly market ‘housing’ of which there is no development plan requirement to provide affordable housing.

3.23 Considering the above in combination, the proposed development is appropriate within the Metropolitan Green Belt and meets the exceptions in full of both paragraph 154(g) and 155(a, b and c).

Principle of development under the emerging local plan (eLP)

3.24 A Revised Growth Strategy for the Local Plan was consulted on between 21 November 2021 and 24 January 2022. This work followed the increased uncertainty around delivering the Grazeley Garden Town and legislative changes affecting emergency planning requirements at AWE Burghfield.

3.25 When considering the weight to be afforded to Wokingham Borough Council's emerging Local Plan Update (LPU), Paragraph 49 of the NPPF (2024) requires regard to be had to:

- the stage of preparation;
- the extent of unresolved objections; and
- the degree of consistency with the NPPF.

3.26 The Regulation 19 version of the LPU was published for consultation in late 2024. The Regulation 22 submission occurred in February 2025, and the plan is now undergoing independent examination. Hearings commenced in November 2025. While the council considers that the plan is consistent with the NPPF, key stages remain outstanding, including the completion of hearings and subsequent main modifications, meaning limited weight can currently be broadly attached to the overall plan.

3.27 The most relevant policies applicable to the current proposal are set out here and include:

Policy SS2 – Spatial Strategy and Settlement Hierarchy.

3.28 The site lies outside settlement limits and does not adjoin a major or modest settlement. As drafted, the proposal would conflict with SS2. However, unresolved objections remain on substantive grounds, and only limited weight can be applied at this stage. It is also relevant that the site already functions as an Integrated Retirement Community, and a modest redevelopment can be considered spatially appropriate for this established use.

LPU Policy SS5 – Development in the Countryside

3.29 SS5 provides exceptions for development outside settlement limits, including the redevelopment or infilling of previously developed land where the character of the countryside is not unacceptably harmed. This criterion is relevant to the proposal. However, due to ongoing unresolved objections, limited weight is afforded to this policy.

LPU Policy SS6 – Green Belt

3.30 SS6 reflects national policy by restricting inappropriate development in the Green Belt and as stated, the development is considered to fall within relevant exceptions.

3.31 In summary, given the LPU's current stage of preparation and the presence of unresolved objections, the emerging spatial strategy-related policies can be afforded only limited weight at this time.

Joint Minerals and Waste Plan

3.32 Paragraph 222 of the NPPF states that: *"It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation."*

- 3.33 Paragraph 225 clarifies this further by stating: *“Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.”*
- 3.34 The Central and Eastern Berkshire Joint Minerals and Waste Plan (Joint Plan) was adopted by Wokingham Borough Council on 19 January 2023. The Joint Plan identifies site allocations and extensions to help provide a future supply of sand and gravel extraction. However, despite these allocations, there remains a shortfall of supply during the plan period. The policy response to address the shortfall is the identification of a ‘Minerals Safeguarding Area’ (MSA), where Policy M2 of the plan applies, and also an ‘Area of Search’ where Policy M4 applies. This approach is to demonstrate the potential for, in effect, windfall provision within the Plan area.
- 3.35 The site is within the defined MSA for Sharp Sand and Gravel (river deposits). Policy M2 aims to seek to protect mineral resources against unnecessary sterilization by non-minerals development. The application covers an area approximately 0.91 hectares in size (the developable area being far smaller) and a 3 hectare threshold is reflected in the supporting text under Policy M2, which states *“A minimum plot size of 3 hectares will apply in the safeguarding process to avoid repeated consideration of prior extraction where this can be assumed to be uneconomic, due to the small size of the parcels of land involved.”* In this respect, no prior extraction is required, bolstered by the site’s sole previously developed land status.

Previously Developed Land

- 3.36 The entire extent of the site’s developable area consists of previously developed land. This arises from proposed use of the existing built form to be demolished, the hard surfaced ‘court’ area to the south and a small area of curtilage to the east of the proposed building.
- 3.37 Paragraph 89 of the NPPF states *“The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”*
- 3.38 Paragraph 129 of the NPPF builds on this and states that planning decisions should *“support development that makes efficient use of land, taking into account: a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it.”*
- 3.39 Whilst of limited weight at this stage, Policy H1 of the eLP provides the LPA’s anticipated direction of travel with respect to efficient uses of land. It states *“Development proposals should optimise density, make efficient use of land and achieve high quality design, that responds to the size, location, opportunities and constraints of the site, and is appropriate to the character and amenity of the area”*. The proposal increases density and built form within a site of existing C2 function, within a sustainable location. The development complies with this policy.
- 3.40 As will be expanded upon below, the Council are currently unable to demonstrate an adequate 5-year housing land supply and therefore the necessity of additional bed spaces and equal contributions to housing land supply within the borough are considered to be meet the NPPFs objective of significantly boosting the supply of accommodation for all groups. Furthermore, the site presents the opportunity to provide the optimum use

of the land, in extending an existing C2 use on previously developed land within an existing site within the borough. This is achieved through partial redevelopment and extension of built form upwards which is appropriate for the site's location (to be discussed within the 'character' section below).

Need Analysis – Older Persons Care

- 3.41 The UK population is ageing, and people can expect to live longer healthier lives than previous generations. The older population is forecast to be 17.6m by 2035 for the over 60s, and to grow from 1.3m (2016) to 3.6m by 2035 for the over 85s.
- 3.42 Given this context, the PPG: Housing for older and disabled people recognises the importance of providing housing for older people, identifying its provision as **'critical'** *[my emphasis]*.
- 3.43 The proposal is for the partial redevelopment of an Integrated Retirement Community (older persons' accommodation). Integrated Retirement Communities (IRCs) are purpose-built C2 residential environments designed to support older people to live independently for as long as possible while having access to flexible, on-site care and support. Within Thamesfield, they form self-contained apartments with a range of communal facilities such as dining areas, lounges, wellbeing spaces, and landscaped gardens. Care is provided on an as-needed basis rather than being tied to a particular level of dependency, enabling residents to "age in place" without needing to move into a more standard care home or single suite. The site (including with proposed built fabric) will provide coordinated management and social activities, sitting within Class C2 care accommodation.
- 3.44 Core Strategy Policy CP2 (Inclusive Communities) seeks to ensure that new development contributes to the provision of sustainable and inclusive communities, including facilities for aged persons. Specifically, CP2a supports proposals that address the requirements of an ageing population, particularly in terms of housing, health and well-being.
- 3.45 The local policy position ensures that new development contributes to the provision of sustainable and inclusive communities to meet long-term needs. Policy TB09(d) (Residential accommodation for vulnerable groups) of the adopted MDD local plan (2014) supports, in principle, proposals that provide accommodation for specialist needs, including 'purpose-built accommodation' for the elderly.
- 3.46 Evidence from the 2023 Local Housing Needs Assessment shows a substantial shortfall in specialist older person's accommodation, with 857 more rented units required by 2040 despite recent permissions. This proposal, for intensifying an existing C2 Integrated Retirement Community, directly addresses that need by providing specialist, high-quality accommodation for older residents, supporting health and wellbeing objectives and complying with the Development Plan. The scheme represents a clear benefit in meeting identified local and national priorities for older persons' care whilst still promoting independent living.
- 3.47 It is appreciated that the application has commissioned a formal needs assessment to accompany the application which outlines the real local need is significantly above this figure reported above, however, given the notable shortfalls identified within the

LHNA no greater weight can be afforded to the overarching pressing need for specialist care apartments which is a substantial benefit of the proposal.

Housing Land Supply

- 3.48 Paragraph 11 of the NPPF establishes the presumption in favour of sustainable development. Where there is no 5YHLS or where the most important policies for determining the application are out-of-date, the 'tilted balance' should be engaged. Paragraph 11d states that permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole.
- 3.49 The Council's most recent published full assessment of the housing land supply position is the 'WBC Five Year Housing Land Supply Statement at 31st March 2025' which concluded a demonstrable deliverable housing land supply of 2.5 years, excluding any consideration of past over delivery. As such, the tilted balance, as advocated by the NPPF, will be engaged.
- 3.50 In this instance, the proposal would redevelop the existing building to provide 17- C2 apartments that given their size would constitute 17 dwellings for the purpose of housing land supply (notwithstanding PPG guidance on assessing care suite accommodation, that does not reflect the proposal). Thus, the proposal would provide a net increase of 13 dwellings to the Council's housing land supply.

Conclusion – Principle of Development

- 3.51 The site, whilst outside of defined settlement limits constitutes the appropriate expansion and partial redevelopment of an existing C2 Integrated Retirement Community which is not inappropriate within the Metropolitan Green Belt. The site is sustainably located for its intended use and supports the re-use of an existing, previously developed C2 site which is suitably served by existing infrastructure. The development makes the most efficient use of the land available and appropriately increases density within a visually perceived built-up area. In this respect, bar partial conflict with the technical requirements of CP11, the proposal in principle is considered acceptable.
- 3.52 By virtue of the council's current housing land supply position, in combination with the specific need for the type of development proposed, the presumption in favour of sustainable development set out in the NPPF at paragraph 11 is now engaged in the decision-making process. Accordingly, an assessment will need to be made of whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole (the tilted balance). This assessment is undertaken in the planning balance section of the report.

Character of the Area:

- 4.0 Policy CP1 of the Core Strategy states that permission will be granted for developments that maintain and enhance the quality of the environment and encompasses sustainable values.

- 4.1 Policy CP3 of the Core Strategy states that development must be appropriate in terms of its scale, mass, layout, built form, height and character of the area and must be of high-quality design. It further goes on to outline the value of adaptable and accessible schemes, those with high sustainability credentials, landscape and ecological enhancement and the efficient use of land.
- 4.2 The proposed built form does not mark excessive encroachment in visual or spatial terms when considered in context of the existing site. Furthermore, the proposal is of an appropriate scale and mass given the Borough's need and sustainability elements proposed, thus is to a degree subservient to existing on site form in its height, promoting a compatible use within an existing Integrated Retirement Community setting and is of architectural merit.
- 4.3 The character qualities of the existing site are very much mixed, with no fixed vernacular visually identifying the site's prior extension and expansion historically. This is reflective of the multitude of architectural styles present on site which leads to an overall positive, but varied appearance.
- 4.4 H1 of the eLP states *"All new development must be of high-quality design to endure over the lifetime of the development and create a strong sense of place."*, outlining design guidance criteria including respecting the character of the area, creating a positive sense of place, creating accessible development and optimises use of land.
- 4.5 R9 of the Borough Design Guide outlines that the height of residential buildings should respond to a number of factors including the prevailing heights and degree of variation in height in the local context, the scale and importance of the space that the building will define or enclose and its position in the street hierarchy (including set back).

The proposed extension

- 4.6 The proposed redevelopment in part consists of the erection a modern extension to the original 'Thamesfield' building of contemporary design in combination with the otherwise redevelopment of the northern wing of the site. The proposed built form comprises three floors over two and a half stories measuring between circa 9.9 metres (excluding plant) and 11 metres when the land levels fall, circa 33.6 metres in width and c 22 metres in depth. The dimensions of the existing southern wing of Thamesfield have been used to justify this scale, with comparative grain proposed, creating an even 'court' style site as a whole, which is complementary to its former Parkland character. This inspiration in terms of the proposal's scale is clarified by an in-depth grain analysis within the submitted design and access statement.
- 4.7 The proposed extension follows the demolition of the existing northern wing of Thamesfield which comprises single storey built form providing 3 care apartments, a meeting area within a high domed orangery of c7.3 metres and entrance hallway. These buildings of circa 1995 are of limited architectural merit and comprise of lighter red brick, thus no objection is raised with respect to their loss.
- 4.8 Whilst is noted that concerns have been raised with respect to the bulk and mass of the proposal, and in particular its height, officers note that the residual height would be on par with existing form on site (existing south east form exceeding 11 metres in height, at three stories though on lower land levels), as illustrated in the contextual elevations below:



Figure 1: Existing wing shown to the left to be if comparable height to the proposal.

4.9 As outlined within neighbouring objections the proposal would sit taller in height than the River Thames fronting element of Thamesfield (alike to its southern wing as existing). This said, the proposed roof form has been altered to provide a less stark relationship and more positive, traditional design (as acknowledged by Historic England) through the receipt of revised plans. The proposed development would sit a limited circa 2.1 metres taller than the mansion wing of Thamesfield, closely reflecting the height of the development immediately to the immediate south.



Figure 2: Proposed West Elevation (contextual)

4.10 It is noted that the taller form in part would be appreciable from the riverbank of the Thames to the West which gives rise to a degree of visual change/harm, however, given its separation of circa 150 metres and notable mature screening in combination with the darker material palette for upper floors, the development to some degree would blend into the existing roof scape (as detailed in the submitted AVR). Whilst this would be to some degree more appreciable than the southern wing of comparable height, the existing relationship of the original manor house and 11 metre form is not considered to be detrimental to the character of the area, and the proposal is expected to follow suit in its siting. The proposed redevelopment is illustrated in the CGI below, prepared during the winter months where no meaningful screening it present above bracken:



Figure 3: CGI of Henley Thames riverbank, looking over to the proposed development.

- 4.11 As outlined above, whilst a degree of visual harm will arise from the proposal given its proposed height and location on the northern edge of the site, the proposal would not demonstrably appear out of context from its most sensitive public visual receptor. In this instance, the proposal thus is not considered to detrimentally harm the character and appearance of the area and therefore does not stand notably at odds with CP1 and CP3 of the Core Strategy, bar acknowledgement in technical terms that the proposal is higher than the existing building, which does not by default equate to detrimental harm that would warrant a significant policy departure.
- 4.12 Turning to other views, the other main publicly visible vantage point would be from Wargrave Road, with the proposed development separated by existing built form, boundary treatment and mature screening. Whilst the upper floor of the development may be obliquely visible from Wargrave Road, this would be visually received in the context of other larger buildings in a less sensitive setting (surrounded by built form and visually hardening features). Further, given the use of a darker material palette on the upper floor, it would be seen to blend into the existing roofscape.
- 4.13 Turning to materials, it is appreciated that the proposal would differ from the considerable variety of design queues taken across Thamesfield, mainly utilising a mixture of light red/ peach brick and white stucco. Notwithstanding, in the context of the site's evolutionary identity (reflecting previous extensions over the ages), additional variety positively separates this wing in design terms, reflecting historic patterns on site that has lead to its existing character, particularly where it respects the historic identity of the wider area.
- 4.14 It is noted that within the submitted Design and Access statement, multiple design queues were investigated with respect to material choices. It is considered that utilisation of matching materials would exacerbate the bulk and mass of the proposal

and pose a greater impact on the positive character qualities on site. Thus, a contemporary approach to design is proposed by the applicant in this instance which takes inspiration from adjoining Remenham Row as well as other red brick dwellings in the near vicinity. It is noted that this material palette will purposefully contrast the original Thamesfield mansion house. This is positively illustrated in the illustrative CGI provided below:



Figure 4: Views of the north elevation from the west, displaying the contrast of materials.

- 4.15 The chosen materials are red brick with pre-cast concrete detailing, grey PPC aluminium windows/ doors and metal cladding. Whilst the details provided are acceptable in principle for the site's location and vastly more appropriate in the context of the site than the existing built form, a planning condition has been secured which will require the submission of samples to the LPA to ensure the chosen materials complement the character of the site.
- 4.16 Internally, each care apartment would benefit from being multi-aspect, with proportionate glazing on each elevation to break up massing as well as positively propose horizontal design features. This creates more visual points of interest which visually break up larger built form. The proposed basement is proposed to be reconfigured for efficiency, with a communications room, cold water mains storage/ booster room and proposed primary LV switch room. This maximises the space above ground and permits reasonable operations to occur within the existing basement to support the functionality of the wider retirement village. The internal layout as submitted and subsequent impacts on character are acceptable in this respect.

External amenity space/ courtyard

- 4.17 As a part of the site's partial redevelopment, high quality front, side and rear amenity space is proposed to the benefit of future residents. The submitted plans show a well landscaped area and walking trail, with a seating area and garden.
- 4.18 Further to review of the submitted daylight assessment, it was confirmed that the vast majority (84%) of the communal open space would exceed guidelines (50% targeted by

BRE) and would offer future residents and visitors a well-sunlit spaces to enjoy during the majority of the year.

- 4.19 In the summer and spring months, the space would receive even more sunlight, with most of the area receiving over six hours per day. This provides a positive amenity feature for future residents, of positive design as illustrated below:



Figure 5: Views of the proposed landscape courtyard

Density

- 4.20 MDD Local Plan policy TB05 (Housing Mix) requires that residential development should provide an appropriate density. Further, whilst of limited weight at this stage, Policy H1 of the eLP provides the LPA's anticipated direction of travel with respect to efficient uses of land. It states *"Development proposals should optimise density, make efficient use of land and achieve high quality design"*.
- 4.21 Applying this to the proposal, an increase in density from 42 care apartments per hectare 56 care apartments per hectare will result from the redevelopment utilising previously developed land within an existing Integrated Retirement Community.
- 4.22 Compact development of a higher density as proposed in this instance further provides opportunities for social cohesion which is increasingly important within the Integrated Retirement Community. The NDG echoes this importance within paragraph 64, in stating *"Compact forms of development bring people together."* In this regard, the proposal by virtue of its compact design provides significant environmental and social benefits, preventing urban sprawl and providing enhanced opportunities for social cohesion. This is particularly important bearing in mind the intended occupants and the benefits associated with feeling part of a close-knit community. As such, the proposed density is acceptable for its location and use.

Conclusion

- 4.23 Whilst a degree of localised visual harm (limited to views received from one receptor point on the Henley side of the Thames) will arise from the proposal's location on the northern edge of the site, given its taller height that the original mansion house (and early extensions) in combination with its contemporary design, the proposal visually reflects the modern needs of a high quality provider of later life care and thus is acceptable for its intended use. The proposal retains a similar height, mass, and form to the existing building on the southern flank and creates a logical court style development for the betterment of its residents.

- 4.24 In this respect, whilst the proposal in part conflicts with CP3(a) of the Core Strategy with respect to its height in the context of the original mansion house and early extensions (marginally altering the outlook from the Henley riverbank), it is not otherwise inappropriate in character terms on site given it largely reflects and mirrors the existing pattern of development to the south. This limited degree of localised harm (limited to the oblique views across the River Thames) when viewed in the context of the existing site and intended use would not stand contrary to the overarching aims of CP1 and CP3 of the Core Strategy.

Built Heritage

- 5.0 The Site is wholly within the Remenham Henley Bridge Conservation Area and forms a part of the wider eastern setting of the Henley Conservation Area. Thamesfield (referring to the original building pre-extension) is a Victorian riverside mansion, of c1875, which was altered and enlarged in the late 19th century. The building was further altered and extended in the 20th century including changing function from a single residential dwelling to first a youth centre and subsequently a nursing home and retirement complex, of which it stands today.
- 5.1 Whilst the building is altered and the site developed, the original white stuccoed Victorian mansion is still very clearly read and is visible on the Henley bank of the river Thames. The proposal would not fundamentally alter this characteristic.
- 5.2 Thamesfield through the application process has been identified as a non-designated heritage asset by WBC Built Heritage given its age, architectural and historic interest. It is, however, important to note the extent of the NDHA is limited to the 19th century element and does not extend to the 20th century extensions on the site which are physically and functionally linked to the original building. It is noted that at time of writing, Thamesfield has not been identified by a plan-making body as a non-designated heritage asset.
- 5.3 Whilst the character qualities of the original building are agreed between WBC and the applicant, its NDHA status is not with the applicant asserting that Thamesfield does meet any criteria for identifying the building as a NDHA. This said, for the purposes of determination the LPA consider Thamesfield to form a NDHA, however, in the context of modern form and extensions which contribute to the site's overall character and its historical merit.
- 5.4 Policy TB24 of the MDD Local Plan states: *"The Borough Council will conserve and seek the enhancement of designated heritage assets in the Borough and their settings by:*
- a. Requiring works to or affecting heritage assets or their setting to demonstrate that the proposals would at least conserve and, where possible enhance the important character and special architectural or historic interest of the building, Conservation Area, monument or park and garden including its setting and views.*
 - b. Supporting development proposals or other initiatives that will conserve and, where possible, enhance the local character, setting, management and historic significance of designated heritage assets, with particular support for initiatives that would improve any assets that are recognised as being in poor condition or at risk.*

Proposals for building works shall retain or incorporate existing features or details of historic or architectural significance or design quality into the scheme.”

- 5.5 Paragraph 207 of the NPPF requires applicants to *“describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.”*
- 5.6 Paragraph 215 of the NPPF states *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”* This outlines that the NPPF seeks to balance harms against the benefits of a proposal where less than substantial harm is identified as opposed to substantial harm, or total loss which is not the case with the proposal.
- 5.7 Paragraph 216 of the NPPF states *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”* Alike to paragraph 215 above, paragraph 216 does not afford a blanket ban or objection on development that affect NDHAs, rather clarifies it is a matter that should be balanced against the benefits, or in this instance (tilted balance) whether such harm is significant enough to demonstrably outweigh the numerous benefits offered.
- 5.8 Further to consideration of the scheme, WBC Built Heritage raised an objection to the proposal and concerns were raised (though not in the form of a formal objection from Historic England and South Oxfordshire District Council). It was concluded by Built Heritage, that in their view the proposals:
- Would result in less than substantial harm at moderate scale to the significance of the Remenham Henley Bridge Conservation Area through the introduction of a conflicting form.
 - Would result in the lower end of less than substantial harm to the significance of the Henley-on-Thames Conservation Area, of which part of its significance is drawn from the setting. It is noted that the Henley-on-Thames Conservation Area does not reference the site itself.
 - Would alter, and thus harm, the setting of a number of identified NDHAs, including the host Thamesfield (these other NDHAs have not been identified within the consultation response).
- 5.9 It is noted from the above that the highest level of harm noted was to the Remenham Henley Bridge Conservation Area, with moderate less than substantial harm afforded to the development. The other harms identified are at the lower end of the sliding scale. Whilst harms are noted in less-than-substantial form to the setting of both CA’s and NDHA, this is somewhat inevitable given the contemporary form proposed in this location. Applying this concern to the NPPF, it is clear that these moderate-limited harms are not sufficient to warrant disengagement of the tilted balance as advocated by

footnote 7 of the NPPF. It is further of note that there is no Conservation Area appraisal that outlines the site's significance in any Conservation Area's context.

- 5.10 The less than substantial harms identified however do engage paragraphs 215 and 216 of the NPPF in assessing the proposed development's harm against its significant benefits. In this instance, the proposal (not exhaustive) would provide a modest contribution to the borough's housing land supply shortfall, within a sustainably located and established site, utilise previously developed land physically well related to existing built form, and strongly contributes to the borough's overarching need for additional specialist older persons accommodation and provide ecological, flood risk and landscape benefits through on-site habitat creation and tree planting. This has the knock-on benefits of creating a higher quality of life for existing residents and supporting the continued viability of the Thamesfield Retirement Village. When assessed against the public benefits above, Officers do not consider that limited to moderate less than substantial harm is sufficient on balance to recommend the application for refusal.
- 5.11 Turning to the development plan, in this instance, given harms have been identified to two designated heritage assets, albeit limited as well as less than substantial harm to NDHA the proposal fails to comply with TB24 of the MDD Local Plan which seeks to enhance and conserve all designated heritage assets, including conservation areas.
- 5.12 It is noted that the wording of TB24 applies only to designated heritage assets within the borough, and the Henley-On-Thames Conservation Area falls within the administrative boundary of South Oxfordshire. Notwithstanding, the identified moderate less than substantial harm to the Remenham Bridge Conservation area is sufficient to warrant a breach in policy directive, as well as limited harms to NDHA within the borough.
- 5.13 With the above in mind, the proposal stands contrary to TB24 of the MDD Local Plan (2014). This is returned to in the planning balance section below along with a comparative assessment of the public benefits afforded by the proposal.

Landscape Character and Arboricultural Matters

- 6.0 Policy TB21 of the MDD states that proposals must demonstrate how they have addressed the requirements of the Council's Landscape Character Assessment, including the landscape quality; landscape strategy; landscape sensitivity and key issues. In addition, proposals shall retain or enhance the condition, character and features that contribute to the landscape.
- 6.1 The Wokingham Borough Landscape Character Assessment (WBLCA), dated November 2019, identifies a number of different landscape character areas (LCA's) across the Borough and provides key information regarding each of the LCA's. The site is solely located within A1 character area 'Thames River Valley', which is a landscape of 'good' quality. Key applicable characteristics for this LCA include:
- Dominated by the River Thames
 - A flat floodplain landscape
 - Defined geologically by a broad alluvial corridor with pockets of River Terrace

- Influenced by adjoining formal parkland landscapes associated with large manor houses.
- Small nucleated and linear settlements clustered along the floodplain edge
- Popular recreational setting for rowing, canoeing and pleasure boating.

6.2 The site is generally visually enclosed by existing vegetation on the majority of boundaries and therefore limiting views of the proposed development from public viewpoints for the majority of the year. There will be glimpses of the larger extension from several viewpoints as shown in the Accurate Visual Representations document during the winter months because the extension will be higher than the existing structure, however these will be seen in combination with the existing Integrated Retirement Community to some extent. WBC Trees and Landscape do not consider the proposed redevelopment will cause substantial harm to the views and setting of the River Thames, nor the openness of the Green Belt subject to positive buffering and soft landscaping.

6.3 As per policy TB21, all proposed developments must at least retain and ideally enhance the character and features that contribute to the landscape. In this instance the proposals are accompanied by an illustrative soft landscaping plan of good quality which identifies notable tree planting, hedgerow planting and ornamental planting on the site's periphery and in the proposed courtyard/ amenity space. This strengthens the site's overall connection to the landscape and helps identify the site as a whole as forming a small nucleated amalgamation of built form along the edge of the Thames. Further, tree planting along the riverside will strengthen the site's sense of enclosure as a former manor house and associated grounds. These matters, along with other intended enhancements are secured by planning condition.

Valued Landscape:

6.4 It is also noted that the site falls within the River Thames Valued Landscape. Paragraph 187(a) of the NPPF states *"Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);"*

6.5 Whilst the site is located within the River Thames Valued Landscape as per the 2020 and 2024 VL Topic Paper, it is noted that many of the 'valuable attributes' within do not apply to the proposal, however the following can be reasonably applied:

- *Distinctive river channel landscape which sweeps through the surrounding landscape and provides a natural feature as well as a recreational resource*
- *Picturesque and historic settlements on the floodplain edge provide a cultural record of the past and contribute to scenic quality*

6.6 As has been acknowledged within the character of the area, and heritage sections above the proposal would result in a limited degree of harm to the townscape and character of the area. Thus, the proposal would technically stand contrary to paragraph 187(a) of the NPPF as it would not enhance the wider valued landscape, however, it is important to consider the context of the site and developable area. Further to

consultation, WBC Trees and Landscape stated *“the changes within the site will have limited or neutral effect on the landscape receptors identified in the document due to the proposal being a replacement structure on the site and set behind the existing buildings from most directions.”*

- 6.7 The site as above demonstrates some of the valuable attributes outlined within the Landscape Character Assessment and Valued landscape topic paper, however, the gross developable area consists of previously developed land, host to existing built form of limited architectural merit. The area planned for development does not demonstrate the valuable landscape attributes as above, and therefore, whilst there is a technical breach in 187(a) this holds limited weight on balance this is because the proposal would have a limited impact on the landscape itself given the site’s relationship with existing buildings.

Arboriculture

- 6.8 The Arboricultural Impact Assessment by RPS Group and dated December 2024 indicates the trees on the site can be suitably protected as shown on the Tree Protection Plan. This has been secured by planning condition, with a further condition appended to control the construction phases and retain existing landscape features of high quality.

Flooding and Drainage

- 7.0 Core Strategy Policy CP1 states development will be acceptable where they avoid increasing (and where possible reduce) risks of or from all forms of flooding (including from groundwater).
- 7.1 Policy CC09 of the MDD Local Plan states *“All sources of flood risk, including historic flooding, must be taken into account at all stages and to the appropriate degree at all levels in the planning application process to avoid inappropriate development in areas at risk of flooding.”* It goes on to state *“Development proposals in Flood Zones 2 or 3 must take into account the vulnerability of proposed development.”* This is echoed by policy FD1 of the emerging local plan which provides further detail on the expectation within a flood risk assessment, sequential and exception test.
- 7.2 Policy FD2 of the emerging local plan states *“Development proposals must ensure surface water arising, including the impact of climate change, is managed in a sustainable manner.”* This outlines the relevant steps of the SuDS hierarchy and how this should be accounted for within a proposed development.

Fluvial Flooding

- 7.3 Following updates to EA modelling in early 2025, the application site now lies within Flood Zones 2 and 3.
- 7.4 Flood Zones 2 and 3 are defined by the National Planning Policy Framework (NPPF) and associated Flood risk and coastal change Planning Policy Guidance (PPG) as having a medium and high probability of flooding.
- 7.5 The proposal constitutes ‘more vulnerable’ development as outlined within the NPPF. As the more vulnerable development is partially within flood zone 3 and hydraulic

modelling (fluvial) has been carried out. The Environment Agency raises no objection to this model and accepts its use in support of the application.

- 7.6 The applicant has submitted a Flood Risk Assessment informed by hydraulic modelling, and Flood Risk Assessment Addendum (and appendices) in support of the application. This outlines that the design flood level for the 1 in 100 year event including 31% climate change when considering the location of the new buildings is 33.26m AOD.
- 7.7 During the 100-year with 31% climate change scenario, the majority of the site falls within the 'low' to 'significant' hazard categories (based on Defra's Hazard-to-People categories). Finished floor levels are proposed 600mm above the climate change flood depth, at 33.86mAOD which is acceptable and will ensure future occupants are safe for the lifetime of the development, a key test within the NPPF.
- 7.8 The submitted flood risk assessment further establishes that the site falls from east to west from 33.50mAOD to 31.71mAOD and proposes replacing the existing impermeable driveway with a green courtyard, as well as making the car park extension of permeable paving. This constitutes a betterment on the existing situation, which is impermeable surfacing at time of writing.
- 7.9 With respect to safety in a flood event, the submitted WSP flood warning and evacuation plan proposes to sign up to flood warnings and gives guidance on the process to be followed by duty managers in the event of a flood, to move residents to a safe location outside the flood plain. Considering the scale and nature of the development, the proposed evacuation plan meets PPG guidance for vulnerable users and deemed an acceptable solution.
- 7.10 WBC Drainage note from the FRA addendum report that flood depths for the 1 in 100-year flood event with a 31% allowance for climate change have been considered and the new buildings will be steered away from high-risk flood areas. This approach is acceptable, and thus informs the location of the proposal. Accordingly, this strategy is secured by condition as suggested by the Environment Agency.

Surface and Ground Water Flooding:

- 7.11 The submitted SuDS technical note establishes that the existing brownfield site is 0.43ha impermeable, with groundwater 1.6m bgl and surface water currently running off to River Thames.
- 7.12 Calculations show the site needs enough space to store rainwater from a 1-in-100-year storm, plus 40% extra for climate change. This will be managed by an 80mm-deep layer on a 284m² green/blue roof and a 20.5m³ underground tank. WBC Drainage has reviewed this and raised no objections. This will be secured by a planning condition.
- 7.13 The proposed drainage arrangement for the Site will comprise of appropriate SuDS system to deliver source control, water quality treatment and biodiversity enhancement and attenuation. The attenuation will be sized to hold the critical 1 in 100 year rainfall event plus 40% Climate change.
- 7.14 Proposals for the application include the replacement of the existing impermeable driveway with a green courtyard. This will naturally provide a reduction of surface water runoff by increasing the permeability of the construction surfaces on the Site. This can

be further developed at later design stages to be incorporated into the Sustainable Drainage System.

- 7.15 A permeable paving system without infiltration will be proposed in the potential car park extension areas to manage surface water runoff close to its source and prevent groundwater contamination. The permeable paving cleans the surface water runoffs through filtration, absorption, biodegradation and sedimentation processes that occurs within the surface structure, subsurface matrix and geotextile layer. Overflow will be connected to the surface water drainage network.
- 7.16 To ensure the effectiveness of the drainage strategy, a drainage maintenance schedule will be in place to ensure the future permeance of all the SuDS and drainage devices for the lifetime of the development, this is secured by planning conditions as a part of the approved strategy.

Sequential/ Exception Test

- 7.17 Paragraph 173 of the NPPF outlines that *“A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding...”*
- 7.18 As a part of the submitted Flood Risk Assessment, the applicant has outlined that the proposal is for the regeneration of an existing Integrated Retirement Community and as such, they consider development is limited to the site boundary and thus cannot be compared with alternative / more sequential preferable sites.
- 7.19 In addition to the above, the applicant has outlined that proposal follows the sequential approach to flood risk by steering the footprints of the new builds away from the areas the most at risk of flooding. This is reflected by the majority of the redevelopment falling within a ‘low’ hazard area.
- 7.20 It is appreciated that the proposal would take on a critical mass in contributing to the wider Integrated Retirement Communities ongoing and future viability, sustainability credentials and operations (with respect to gross carbon footprint reduction), as outlined within the submitted Financial Viability Assessment and Sustainability Strategy. In the above respects, the proposed redevelopment is very much intrinsically linked to the wider site itself which is a material consideration and accordingly limits consideration of other sites within the borough.
- 7.21 Whilst ordinarily it could be suggested that the same development could be facilitated within another Integrated Retirement Community across the borough, very few of such specialist nature exist and given this intrinsic link it would not be a realistic comparison on this occasion. With the above in mind, the Sequential Test is therefore satisfied as the proposal involves redevelopment of previously developed land, where alternative sites at lower flood risk are not reasonably available within the same functional area, consistent with NPPF paragraph 173/177.
- 7.22 Considering part of the site lies within Flood Zone 3A, the exception test is required to be assessed by the LPA. The NPPF outlines in paragraph 177 that the need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in

Annex 3. As outlined above, the proposed use would be 'more vulnerable' as per Annex 3 and given location in FZ3A, the exception test is required.

7.23 To pass the exception test the NPPF outlines that it should be demonstrated that:

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

7.24 In this respect, the applicant identifies the following matters of notable benefit which are agreed by the LPA:

- 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 has the potential 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.
- 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.

7.25 Furthermore, as demonstrated above, the proposal will decrease the impermeable area on site and provide a climate change resilient building which will be safe for its lifetime (accounting for raised FFLs, attenuation and surface water storage). In this respect, the proposal provides a betterment in terms of flood resilience from surface water sources and furthermore provides a robust mitigation plan to ensure safety for future occupiers. Thus, with the above in mind, the exception test as required by paragraph 177 of the NPPF is passed.

Waste/ Foul Water

7.26 Further to consultation, Thames Water outlined that the catchment is subject to high infiltration flows during certain groundwater conditions. However, the scale of the proposed development does not materially affect the sewer network and as such no objection has been made.

7.27 Thames Water would advise that with regard to the foul water network capacity, no objections were made to the above planning application, based on the information provided.

7.28 The application indicates that surface water will not be discharged to the public network and as such Thames Water has no objection to this matter either.

Summary

7.29 Based on the above, the proposal incorporates a comprehensive flood risk and drainage strategy, including raised floor levels, SuDS features, and an evacuation plan, ensuring safety for future occupiers and no increased risk elsewhere thereby according with NPPF Section 14, Core Strategy CP1, MDD CC09 and CC10, and emerging policies FD1 and FD2.

Neighbouring Amenity

8.0 Policy CP3 of the Core Strategy aims to protect neighbouring amenity and R23 of the Borough Design Guide SPD requires that extensions relate to and account for neighbouring properties.

8.1 The NPPF (2024) in paragraph 135(f) states that planning decisions should ensure developments have *“a high standard of amenity for existing and future users.”*

Overlooking

8.2 R15 of the Borough Design Guide SPD requires the retention of reasonable levels of visual privacy to habitable rooms, with separation of 22-30m to the rear and 10-15m to the street (i.e. front to front). In this instance, considering the proposal relates to development above two-storey, the 15 metre front to front, 30 metre back-to-back distances should be considered as well as 15 metre back to flank (flats to houses).

8.3 Whilst the site spatially is located within the designated countryside, the site's intrinsic character is very much informed by compact design with the majority of units on site featuring separation distances below that associated with a general C3 residential use (which the BDG is based on). The BDG accounts for such situations, in outlining that *“Schemes ... with a more intimate character will often require a tighter, more compact layout.”*

8.4 In this respect, it is advised for separation distances to be relaxed insofar as to preserve the site's more compact character which achieves both an efficient use of the land and further complements the operations of the proposed C2 use (with respect to security, social cohesion and community). Notwithstanding, as will be evidenced below the proposal achieves an acceptable relationship with neighbouring properties, with compliance with the BDG evidenced in the vast majority.

8.5 The proposal forms multi-aspect C2 apartments and therefore, measurements concerning its separation distances to neighbouring C2 apartments do not comfortably fit within the BDG recommendations. Notwithstanding, to cautiously assess potential overlooking arising from the proposal, the application has been assessed on an apartment-by-apartment basis, with the figure arrived at dependent on the relationship, location and orientation of potentially impacted dwellings, the vast majority of these falling within a front to front relationship given the site and surrounding properties context (including the provision of an adjoining access road).

8.6 In terms of the proposal's relationship with surrounding retirement apartments within the application site, and within Remenham Row (the subject to numerous resident objections as well as from a representative on behalf of the Parish), the following table has been prepared to explain the standard utilised, and whether a shortfall is present. The apartments assessed are those principally impacted by the development proposals at Thamesfield (including those within):

Property	Standard Utilised	Separation Distance (Building building) to	BDG Requirement	Compliance
No. 1 Remenham Row	Front-to-front	C26m	15 metres	Yes
No. 2 Remenham Row	Front-to-front	C23.4m	15 metres	Yes
No. 3 Remenham Row	Front-to-front	C21.4m	15 metres	Yes
No. 4 Remenham Row	Front-to-front	C24m	15 metres	Yes
No. 5 Remenham Row	Front-to-front	C23.8m	15 metres	Yes
Flat 10 - Thamesfield	Flank-to-flank	C7.8 m	15 metres	No
Flat 9 - Thamesfield	Flank-to-flank	C7.8m	15 metres	No
Flat 10 - Thamesfield	Flank-to-flank	C6m	15 metres	No

8.7 With respect to justifying the front-to-front relationship utilised between the application site and Remenham Row, this is due to the nature, positioning and function of the dwellings opposite the application site. The views from the apartments would face the front doors, front gardens, parking and access for Remenham Row.

8.8 Whilst it is appreciated that neighbour objections outline this greenspace is used for amenity activities and that habitable windows are present on the front elevations, the dwellings and their curtilage from this angle resemble standard front gardens and a private amenity 'court' is afforded to all residents of Remenham Row to the rear. Further, it is entirely standard for the front elevation of dwellings to feature habitable windows and marginal intervisibility is expected across the street (applied to the private access road to Remenham Row). In this instance, a private access road runs through Remenham Row which further replicates this relationship albeit not a public highway, or shared road. Thus, in this instance, it is appropriate to apply a front-to-front separation standard, to which the proposal is clearly in excess of.

- 8.9 Even should a back-to-back relationship be (in officer's view) inappropriately applied to this relationship, the shortfalls would not be significant, particularly in the context of a compact development such as the application site. In fact, it is worth noting that the objections pertaining to the proposed balconies and views afforded would in fact be BDG compliant at 2-storey (where they face). Following reductions to the scheme, the first and second floor 'walk out' balcony elements have been removed and instead replaced with Juliet style balconies which further limits visibility and time spent in these areas, particularly as sound outlook from the side elevation is present overlooking the Thames and Wargrave Road for the variety of apartments.
- 8.10 Whilst the mitigation measures proposed (namely the set back and removal of third floor balconies) resolve previously significant concerns related to overlooking, this does not override the perception of overlooking that to some degree would inevitably arise from the introduction of a large building directly facing the front elevation of existing dwellings. By virtue of the increased height and the fact that habitable windows are proposed facing existing dwellings (albeit the least 'important' elevation, being the front), the perception of overlooking is a material consideration, even if compliance is achieved in accordance with the BDG.
- 8.11 The Wokingham Borough Design Guide acknowledges this perceived harm in stating *"Studies have shown that perceived privacy is determined more by the degree to which one hears one's neighbours than by overlooking."* Whilst a limited degree of perceived overlooking will arise from the proposal (perceived harm notably lessened given the front to back relationship), as above, it should be noted that the application lays within an area characterised by compact design with dense urban grain where minor shortfalls (not across the board) contribute to the proposed and existing uses. In this instance, the degree of perceived intervisibility should to some degree be expected.
- 8.12 To conclude, whilst there is a recognised limited degree of harm associated with the development in terms of perceived overlooking, given the adequate separation distances for the site's context, combined with recessed additional floors and the fact the outlook reflects a front elevation this harm is insufficient to refuse the application.

Sunlight and Daylight:

- 8.13 R18 of the Borough Design Guide SPD requires sufficient sunlight and daylight to new properties, with dwellings afforded a reasonable outlook, preferably dual aspect (with the avoidance of north facing, single aspect flats) and no material impact on levels of daylight in the habitable rooms of adjoining properties.
- 8.14 Through discussion with officers, the projecting roof form has been set down and sloped to create form that does not significantly intrude on access to daylight/ sunlight to adjoining properties in accordance with the Borough Design Guide. This further allows the vertical light of the sun to access neighbouring habitable windows. However, limited levels of harm have been demonstrated to exist to a small number of existing apartments within Thamesfield and marginal harm to No.2 Remenham Row in terms of NSL.
- 8.15 A detailed daylight and sunlight assessment has been submitted in respect of the proposal's impact on neighbouring properties in accordance with the British Research Establishment (BRE) guidelines contained within the Site Layout Planning for Daylight and Sunlight: A guide to good practice (2nd Edition). This includes Vertical Sky

Component (VSC) and Average Daylight Factor (ADF) which measure diffuse daylight. These are assessed below:

Vertical Sky Component (VSC) and No-Sky Line (NSL)

- 8.16 Vertical Sky Component (VSC) measures the amount of skylight reaching a window itself and is not room specific. If the VSC with the new development in place, is both less than 27% and less than 0.80 times its former value, occupants of the existing building will notice the reduction in the amount of skylight received. However, BRE guidance states that *“VSC between 15% and 27%: Adequate daylight may still be possible with larger windows or shallower rooms, corresponding to obstruction angles between 45 and 25 degrees.”*
- 8.17 With respect to the dwellings at Remenham Row, it has been demonstrated through this assessment that no harm will arise on VSC grounds. This means that notwithstanding the concerns raised by residents, the amount of sky light reaching their windows will remain in excess of good practice guidance.
- 8.18 Turning to inside of the existing development (Thamesfield), Officers note that nine windows fall short of guidance for vertical sky component which are located across six flats within the existing development. The overshadowing assessment outlines that four of the nine impacted windows will experience minor VSC alterations between 21% at the lower end and 29% at the upper end which does not comply with the BRE’s recommendation of 20% albeit demonstrating limited residual harm. Two windows across Flats 10 and 6 experience moderate VSC alterations 35% and 31% respectively with the remaining three windows located in Flat 9 experiencing VSC alterations in excess of 40% which is an appreciable shortfall when assessed against BRE Guidance and thus requires further assessment.
- 8.19 It should be noted that failure to comply with BRE Guidance with respect to VSC alteration does not necessarily equate to harm. VSC breaches merely imply a window ‘may’ receive a loss of light or less sky light. On such occasions where VSC breaches are noted, it is reasonable to assess a proposal and an existing window against No Sky Line (NSL).
- 8.20 NSL is a room-based test which measures how daylight penetrates inside a room. The NSL is the line on the floor (or working plane) beyond which no direct skylight from the window can reach. This shows how much of the room gets useful daylight. Areas in front of the NSL receive direct skylight, areas behind the NSL are in shadow / rely on reflected light. Once triggered by a VSC failure, NSL evaluates the daylight distribution inside the affected room, checking if the no-sky area increases by more than 20% compared to the existing situation.
- 8.21 Further to these tests being carried out, all 9 of the impacted windows pass the NSL test and thus would remain providing adequate sunlight for occupiers.
- 8.22 As a cautious step, it is noted that notwithstanding an acceptable VSC, the applicant has measured the NSL (which is generally a secondary test) to No.2 Remenham Row. This identified harm in one ground floor front facing window. This window would experience a very limited alteration of 22% (against a BRE recommendation of 20%) and thus, whilst the proposal would technically result in a 2% breach in NSL, as the

living room will continue to retain a high level of sky visibility of 76% this is not considered to be detrimentally harmful to existing occupiers.

Sunlight to Windows (Annual Probable Sunlight Hours)

- 8.23 APSH measures the amount of direct sunlight a window receives over a year, expressed as a percentage of the total possible sunlight hours at that location. It accounts for obstructions (buildings, trees, etc.) that block sunlight. This assessment only applies to windows that face within 90° of due south, typically living rooms or other habitable spaces. The BRE sets target values for ASPH which varies between annual and winter. Annual APSH: ≥ 25% of total possible sunlight hours and winter APSH (21 Sept – 21 Mar): ≥ 5% of total possible sunlight hours.
- 8.24 A development is considered to cause “unacceptable” sunlight loss if the affected window falls below these thresholds, and the reduction in sunlight is more than 20% from the existing situation.
- 8.25 Applying this to the proposed development, the proposal would have no detrimental impact on Remenham Row with respect to its sunlight to windows either annually or over the winter (where values as demonstrated above, vary).
- 8.26 Turning to the existing development, one window would fall short of guidance for sunlight is located in Flat 9. Annual sunlight levels to the window will reduce to 20% (against a BRE recommendation of 25%) and will remain BRE compliant for winter sunlight. When considering the change of sunlight to the room (and room as opposed to window based assessment), the room will remain BRE compliant for annual and winter sunlight.
- 8.27 To conclude, whilst marginal shortfalls in VSC and one example of NSL are evidenced to arise from the development, these do not result in sub-standard living conditions for any existing occupants. It is important to note that that paragraph 130(c) of the NPPF outlines that “...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).”
- 8.28 On this occasion, given the proposal makes most efficient use of the land and the resulting shortfalls either are surpassed by more detailed NSL assessment, or limited in nature insofar as to result in retained high standards of amenity, this minor technical breach is not considered to constitute even marginal detrimental harm, nor refusal of planning permission.

Overbearing

- 8.29 It is appreciated that the proposed development would change the outlook for those within Remenham Row, however, this change would not have a detrimental overbearing impact insofar as to warrant objection.
- 8.30 At current, views from Remenham Row face the existing single storey wing and domed orangery comprising of a mixture of built form varying from 6.6-7.3 metres. Whilst it is noted that the proposed development of between 9.9-11 metres would alter this outlook (9.9 metres where it directly faces Remenham Row), views at current span over the

single storey roof forms to visualise the three storey form in the middle of the site, which notwithstanding location technically within the designated countryside is a very much urban outlook. Further, the proposed development would be set back into the site by a further c7 metres at the closest point, where the existing form sits nearly on the boundary (c0.8 metres away) at current.

8.31 Whilst it is appreciated that views from the front elevation of Remenham Row would indeed marginally change given the presence of larger built form, considering its separation this would not mark a significant overbearing impact, particularly considering the front elevations of Remenham Row would be facing the development and rear amenity area unimpacted (even in perception) by the development.

8.32 Turning to inside the development, it is appreciated that Flats 6,9 and 10 would be located below recommended separation distances from the proposed flank elevation of the development, however, impacted windows are in the vast majority secondary, with principal outlook falling on to the east and south. It is noted that the outlook would change from these units, however, interim planting has been proposed to provide pleasant views on the shared courtyard and a social 'mews' style relationship which is a positive thing given the existing use of the Integrated Retirement Community.

8.33 With the above in mind, despite the proposal being larger in scale than the existing built form, no detrimental overbearing impacts are predicted to arise. This said, the limited harm from a change in view inter development is appreciated and this to a limited degree weighs against the scheme within the planning balance.

Highways

9.0 Appendix 2 of the MDD Local Plan outlines relevant parking standards for each type of development, depending on its location.

9.1 There are currently 28 formal parking spaces (2 being informal), 2 disabled spaces. It is proposed that this will be increased to 36 formal parking spaces and 4 disabled spaces. It is proposed that the spaces will be 4.8m x 2.4m which is less than Borough standards but in keeping with existing spaces. In this case this is acceptable and no objections are raised by WBC Highways on this basis.

9.2 A parking survey was carried out on 2nd and 3rd Feb 2023 which is an appropriate timeframe. This survey concluded that at the busiest time (11-12) there were 9 free spaces. This assessment is acceptable and reflects the situation on the ground during officer site visit. The parking utilisation was used to calculate the impacts of increasing the number of units to 47. At the busiest time of 11 – 12 there would be no spare capacity. However, the assessment assumed the same level of visitors as previously and at the same time which may not happen.

9.3 In addition, the increase in staff numbers (5) would be employed at the same time as existing and there has been no inclusion of shift working. In addition, this type of development operates usually at 80% capacity. Highways is therefore content that there would be sufficient parking on site.

Cycle Parking

9.4 It is proposed that a Sheffield stand will be provided for cycle parking for the increase in staff numbers. It is proposed that these will be in a safe, secure and accessible sheltered location. This is welcome.

9.5 WBC Highways outlined that the location of the cycle parking would need to be shown in plan form. This has been secured by planning condition.

Electric Vehicle Charging

9.6 There is one existing charging point on site. It is proposed to increase the number to 8 which is welcome and further will be governed by building regulations where appropriate.

Traffic Impact

9.7 Due to the proposed increase in number of units and staff, there would be little or no impact on the wider highway network which is welcomed by WBC Highways.

Access

9.8 Further to consultation, WBC Highways is satisfied that there would be no requirement to amend the current access which is sufficient for the proposed redevelopment.

Servicing

9.9 It is proposed to increase the number of private refuse collections to two collections per week which would not have an impact on the wider highways network.

Swept paths

9.10 Swept paths for a fire tender and large car have been submitted which are welcome and acceptable.

Framework Construction Management Plan

9.11 Due to the scale and location of the development highways would have expected to see a framework construction method statement. However, highways is content to secure this through a planning condition.

Locational Sustainability

9.12 CP6 of the Core Strategy aims to promote a modal shift away from the use of the private motor vehicle.

9.13 In terms of walking and cycling, the site is considered sustainable and suitable for its quasi-residential intended use, being located near to a vast range of day-to-day services afforded by adjoining Henley. 2no. bus stops served by the 'Good' (as per CP6) 850 bus service are present within c13 metres and c58 metres of the application site respectively which permits easy access for future employees and those visiting the site, in combination with more mobile occupants. Officers note that a further 10 bus stops and a train station are within a 800 metre walk from the application site which the National Design Guide reflects as an acceptable walking distance.

- 9.14 Turning to services, the site is served by numerous shops, services, a hospital and facilities within Henley. This provides an excellent opportunity for future occupiers, visitors and staff to support the local economy without requiring the frequent use of the private motor vehicle.
- 9.15 To conclude, the site is highly sustainable in terms of walking environment, services offered and modes of public transport. Accordingly, the proposal in principle does not stand contrary to CP6 of the Core Strategy.

Accessibility

- 10.0 In determining this application, the Council is required to have due regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion, or belief. As this proposal concerns C2 apartments, the protected characteristic of age and disability should be considered.
- 10.1 Policy CP2 of the Core Strategy also seeks to ensure that new development contributes to the provision of sustainable and inclusive communities, including for aged persons, children and the disabled. 10–20% of all dwellings should be to Lifetime Homes standards in accordance with Policy CP5 of the Core Strategy and Policy TB05 of the MDD Local Plan. In this instance, the proposal would effectively provide for those with at least two protected characteristics above but making specialist provision for their later life care.
- 10.2 In this case it equates to 2-4 apartments (rounded up from 1.7-3.4). Although the Lifetime Homes standards has been replaced by the new National Technical Housing standards, the need to design and build accessible and adaptable accommodation remains integral to future neighbourhood planning. In this instance, given all apartments will be served by a lift and level access, the adaptability of the scheme is of key priority, hence the requirement for roof top plant. The proposal not only complies with the policy requirement for lifetime homes standard (albeit constituting C2 use), but notably exceeds it which decreases barrier to entry for future occupiers.

Internal Amenity and Apartment Mix:

- 11.0 Policy TB07 of the MDD and R17 of the SPD require adequate internal space to ensure the layout and size achieves good internal amenity.
- 11.1 The C2 apartment proposals comply with the Nationally Described Space Standards and TB07 in that the minimum GIA notably meets, or in the vast majority exceeds the required floor space levels for both 1 and 2 bed apartments, providing a high standard of internal amenity.
- 11.2 The NPPF seeks to promote development that has a high standard of amenity for existing and future users and Paragraph 166 of the NPPF state that new development should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 11.3 The proposal in has significantly exceeded this requirement with the provision of high quality private and shared amenity space, highly sustainable modern apartments and

pleasant, well landscaped, river fronting surroundings. Those apartments that are not furnished with private balconies will have direct access to shared amenity space on the ground floor, linking to the pleasant circular walk around the grounds of Thamesfield.

- 11.4 Turning to the mix proposed, a variety of one and two bedroom apartments are proposed which permit multiple occupancy, separate rooms upon need and adequate space for a carer if and as required. Considering the intended function, this variety is welcome and acceptable.
- 11.5 Whilst generally single care suits of limited scale are suitable for their intended function, a larger apartment allows a more comfortable experience for its occupants to age in place. A larger apartment further allows room for mobility aids (walkers, wheelchairs) and future adaptations or space for a carer if needed.
- 11.6 Furthermore, the mix proposed including larger units can assist with downsizing where one or more occupants have extra care needs. This assists with freeing up housing stock through the provision of larger, more comfortable spaces to receive care.
- 11.7 Overall, the levels of internal amenity are high quality and exceed national requirements to provide a comfortable extra care experience for future occupants.

Environmental Health:

Contamination

- 12.0 With reference to the Council's GIS mapping system, the site is within the potentially contaminated land register. Notwithstanding the fact that the proposal constitutes previously developed land and features C2 use at current, on a precautionary basis the possibility of contamination should be considered when a potentially sensitive development, containing a C2 use, is proposed. For this reason, Officers have secured an unexpected contamination condition should this arise during construction.

Waste Storage

- 12.1 Policy CC04 of the MDD Local Plan requires adequate internal and external storage for the segregation of waste and recycling as well as provision for green waste and composting and an appropriate area for ease of collection. The submitted design and access statement outlines that waste and recycling is to be collected from the individual units by the building management and moved to an existing refuse store area within the service yard which has acceptable capacity.

Noise

- 12.2 Paragraph 187(e) of the NPPF aims to minimise potential adverse impacts resulting from noise from new development. Similarly, Policy CP3 of the Core Strategy aims to protect neighbouring amenity, Policy CC06 and Appendix 1 of the MDD Local Plan requires that development protect noise sensitive receptors from noise impact. Page 46 of the Borough Design Guide SPD states that, *"perceived privacy is determined more by the degree to which one hears one's neighbours than by overlooking"*. Policy HC8 of the LPU carries this consideration into the next plan period in stating *"Development proposals must demonstrate how noise impacts have been addressed, to protect sensitive receptors, including existing and proposed dwellings."*

- 12.3 In support of the application, the applicant has submitted a BS 4142 and 8233 compliant noise assessment which assesses the proposed development and its relationship with adjoining occupiers. The nearest receptors have been identified as the proposed development itself and existing residential dwellings within Thamesfield Retirement Village and those along Wargrave Road to the north including Remenham Row to the north.
- 12.4 During the daytime the combined building services plant noise emission contribution limit advised is 35 dB(A) and during the night-time the combined building services plant noise emission contribution limit advised is 33 dB(A), one metre from the nearest residential façade. This would sit 59 dB (A) and 36 dB (A) below the surveyed LaMAX figures and considerably below the LaMIN levels surveyed (by 4 dB (A) and 6 dB (A) respectively). It is appreciated that CC06 of the MDD Local Plan and accompanying appendix 1 outline a 30 dB (A) internal level is required at night and 35 dB (a) within this day. Considering these measurements above reflect external noise levels, the proposed façade level noise is considered acceptable and secured by condition.
- 12.5 It is noted that notional glazing requirements for varying internal spaces and indicative glazing configurations have been provided, however, the submitted noise assessment clarifies that the defined performances for glazed elements are for guidance purposes only. Accordingly, a condition has been appended to the recommendation to require these final details prior to commencement.
- 12.6 On the basis of the guidance contained within this report, of which principles are secured via condition, the proposal does not stand contrary to the NPPF nor CC06 in this respect.

Building Sustainability

- 13.0 MDD CC04 part 2, (a) (as clarified by the WBC Climate Change Interim Policy Position Statement, 2022 (CCIPPS)). This policy requires non-residential schemes over 100m² G.I.A. to achieve BREEAM “Excellent” certification as a minimum.
- 13.1 MDD CC04 part 3 – requires incorporation of suitable waste management facilities on-site, including recycling.
- 13.2 MDD CC05 part 2 (b) (as clarified by the CCIPPS) - requires demonstration through modelled Building Emission Rate of a minimum 10% carbon reduction relative to Target Emission Rate/s (TER/s) arising from the version of the Building Regulations extant at time of full planning or reserved matters application.
- 13.3 WBC Core Strategy Policy CP1(12) states that development will Contribute towards the goal of reaching zero-carbon developments as soon as possible by:”

“a) Including appropriate on-site renewable energy features; and”

“b) Minimising energy and water consumption by measures including the use of appropriate layout and orientation, building form, design and construction, and design to take account of microclimate so as to minimise carbon dioxide emissions through giving careful consideration to how all aspects of development form.”

- 13.4 Paragraph 167 of the NPPF states *“Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic.”*
- 13.5 The submitted Sustainability & Energy Statement states that the scheme will incorporate a 38.5kWp roof-mounted photovoltaic array and that domestic hot water will be supplied by exhaust air heat pumps.
- 13.6 Through these measures, alongside building fabric enhancements and application of passive design principles, the development is expected to achieve a site-wide reduction in regulated emissions of 78% compared with the baseline of the Part L 2021 notional TER. This constitutes a highly sustainable and futuristic development in this respect that in terms of carbon savings would exceed even BREEAM ‘Outstanding’. Given this aspirational target exceeds maximum requirement by such a significant figure, a reduced rate of 75% has been secured by condition to account for post permission detailed design which remains in excess of 7.5x the policy requirement.
- 13.7 The as designed BRUKL output confirms that 65.48kWh/m² of energy is displaced by the array relative to a notional displacement of 21.44kWh/m², an improvement of around 200% showing the likely regulated energy demand and related emissions baselines for the homes are not provided.
- 13.8 The approach to renewable and low carbon technology is feasible, suitable for the proposed development, well evidenced and more than adequate in generation capacity to comply with WBC sustainable development policies.

Passive design measures

- 13.9 Glazing ratios are provided in Appendix A to the energy and sustainability statement, showing window to wall ratios (WWR) of 13%-32% for typical apartment plans. CIBSE TM59 criteria are used to assess the proposed development, with results supplied in Appendix C to the Energy and Sustainability Statement. Criterion A & B pass rate as modelled is 100%.
- 13.10 The submitted Statement notes that *“Suitable g-values will be specified to further control solar heat gains as required; and – Buildings will have the capability for internal blinds to be installed to improve occupant comfort.”* TM59 modelling is based on a specification of g-value 0.40 which is aligned with best practice solar transmittance for passive design. Other design measures incorporated to reduce overheating risk include the reduction in glazed area of single windows and Juliet balcony doors, incorporation of solid (unglazed) lower casements, and provision of solar shading through extrusions and railings.
- 13.11 These measures, which are supported by the drawings as proposed, coupled with the use of DSM comprise a robust response to design to reduce risk of summer overheating.
- 13.12 The Energy and Sustainability Statement shows how the need to control thermal gains is balanced with the need to maximise infiltration of natural daylight, stating that the scheme will achieve *“at least 70% EN Spatial Daylight Autonomy compliance”* This is supported by an external daylighting assessment of communal open spaces

provided in the Daylight, Sunlight and Overshadowing Report prepared by GIA, which states that “(82%) out of all 17 units tested meet the first criterion of having at least one main window wall that faces within 90 degrees of due south ...81% of the proposed communal open space sees two or more hours of direct sunlight on 21st March. This exceeds the BRE recommendation of 50%”.

- 13.13 The ventilation strategy incorporates MVHR with the potential of active cooling installation (via fan coil) to ensure adequate air quality in the building which is specified with a high level of air tightness. The active cooling will act as a failsafe on the occasions when operative temperatures may be exceeded, though this is not likely to be often based on the TM59 results. MVHR plant will be roof-mounted, ensuring intake is at a distance from pollutant sources such as vehicle exhausts.
- 13.14 From examination of the submitted plans, the proposed block and apartments are simple and rational in form, with the apartment-block typology reducing the external area of each dwelling. Extraneous junctions are reduced, ensuring that heat loss through the building envelope will be minimised without inhibiting the benefits of natural daylighting.
- 13.15 The Energy Statement provides fabric performance targets that in the vast majority exceed Part L requirements. The proposed redevelopment makes improvements on the minimum fabric performance specifications of the notional building generated by the Building Regulations. In some areas it achieves best practice, with the vertical windows and walls being particularly well insulated. These measures are positively viewed as contributing to the fabric first approach to reducing operational energy demand and providing a safe and comfortable internal environment.
- 13.16 The use of Mechanical Ventilation with Heat Recovery and Exhausted Air Heat Pump alongside a highly insulated and airtight building fabric, and photovoltaic panels is supported as an appropriate strategy for reducing operational emissions.

Whole life impacts

- 13.17 The proposals include the demolition and disposal of a large existing block, which will generate significant embodied emissions. The Energy and Sustainability Statement notes that *“A strategy to reduce, reuse and recycle materials in alignment with the principles of circular economy throughout design, construction and operation will be applied, minimising waste generation and the use of virgin materials”* will be applied and a sustainable procurement plan will be implemented. This approach is supported in principle.
- 13.18 It is noted that CLT slabs may be used for the structure, which would reduce embodied emissions compared with a traditional steel or concrete frame. This measure, if adopted, is supported and contributes positively to the reduction of Whole Life Carbon arising from the proposed development.

Response to WBC MDD Local Plan Policy CC04 and CC05

- 13.19 The commitment to achieve an 78% reduction in operational regulated emissions through a combination of fabric performance upgrades and use of low and zero carbon technologies relative to the Part L baseline exceeds the requirements of BREEAM ‘Excellent’ (and even parts of BREEAM ‘Outstanding’) and is notably exceeds the policy compliant figure with WBC MDD CC04 Part 2 (a).

- 13.20 The application of the standard condition ensuring that the provision for onsite renewable energy is delivered at the level described is included within the recommendation, which marks a significant benefit of the development.
- 13.21 No proposed flow rates for water appliances are included in the statement. However, the inclusion of defined targets for water efficiency and flow rates of fixtures would have lent weight to the statements made.
- 13.22 A commitment to monitor operational water use is noted as beneficial to the sustainability of the development as well as a commitment to rainwater harvesting is noted as beneficial to the sustainability of the development.
- 13.23 Application of the standard condition ensuring water efficiency measures are specified at detailed design stage in accordance with the details supplied in the Energy Statement is recommended.
- 13.24 The Energy Statement confirms that a Building Regulations compliant level of Electric Vehicle charging points will be provided, amounting to one charging point per dwelling. This is secured by planning condition.

Conclusion

- 13.25 In summary, the application displays a standout approach to sustainable development, including aspects of best practice design and specification. In particular, the thermal and solar design is well considered and appropriate for the development type and resident demographic. This weighs positively on balance for the proposal and will be secured by planning condition.

Ecology:

- 14.0 The site is located within habitat that matches that where bat roosts have previously been found in the borough. It is surrounded by habitat of high suitability for use by foraging and commuting bats and backs onto the River Thames (a 'priority habitat') with open fields and lines of trees in all directions

Bats:

- 14.1 The applicant has supplied an updated information as requested in our last memo, including details of surveyors, building layout references as well as locations of the potential bat roost features. The bat survey reports (RPS Group, October 2023, RPS Group, November 2024) conclude that one of the buildings (B3) is a confirmed soprano pipistrelle bat roost. As this building will be demolished, a licence for development works affecting bats will need to be obtained from Natural England - for derogation from the provisions of the Habitat Regulations, before works which could impact upon the roost can commence.
- 14.2 The submitted report provides brief mitigation details, however full details will need to be provided which will ensure that bats are not harmed and that replacement roosting sites are provided and if it is implemented the favourable conservation status of bats will be maintained. This can be in the form of a bat license.

- 14.3 A planning authority's duty under The Habitat Regulations Planning Authorities have statutory duties under The Habitat Regulations. It needs to be satisfied that a licence for development works affecting bats is likely to be granted by Natural England. [The courts have considered the application of a planning authority's duty under the Habitat Regulations e.g. Morge vs Hampshire County Council (2010). In the Morge case the supreme court has ruled that it cannot see why planning permission should not be granted unless the proposed development would be unlikely to be licensed as a derogation from those provisions.
- 14.4 In this case it is considered that as long as a mitigation plan such as that given in the bat survey report is provided the proposed works would pass the three tests of The Habitat Regulations, and as such receive from Natural England a licence, because:
- 14.5 The development is for an imperative reason of overriding public interest of an economic nature as the development will contribute to a social and economic need of the local community for better and specialist housing. Therefore Regulation 55(2)(e) can be met.
- 14.6 There is no satisfactory alternative to the development as without carrying out the works the aforementioned need would not be met - therefore Regulation 55(9)(a) can be met.
- 14.7 Appropriate mitigation can be provided which will ensure that there will not be a detrimental impact to the favourable conservation status of the bat species concerned therefore Regulation 55(9)(b) can be met.
- 14.8 Biodiversity Net Gain (BNG)
- 14.9 The application is accompanied by a Biodiversity net gain report (RPS Group, November 2024) which concludes that the development will lead to a net gain of 0.64 (12.22%) Area Habitat units (AHUs). This is achieved through on site enhancement as well as proposed tree planting within the Red line boundary. This matter is secured by a planning condition requiring the submission of a Habitat Management and Monitoring Plan which will be monitored via S106.

NHS and Healthcare

- 15.0 Policy CP1 of the Core Strategy states that *"Development within the borough should enhance the overall sustainability of the area through minimising impact on the environment, including access to facilities.."*
- 15.1 Further to consultation, the Integrated Care Board (NHS) requested a contribution towards the creation of additional clinical capacity at Bell or Hart GP Surgeries or an identified primary care estates project in the local area to serve the development.
- 15.2 Based on the proposed increase in apartments on site and requisite increases to capacity required (albeit private health options are afforded within the scheme) a contribution of £15,405 has been requested which has been agreed by the applicant.
- 15.3 The ICB clarified that at the time of producing their comments, a 2.7 m² (gross internal area) is required to provide the requisite increases in capacity required, based on a

building cost of £5,692 per square metre. This obligation will be payable prior to the commencement of development and will be included in a S106 legal agreement.

Employment and Skills

- 16.0 The application would increase the on-site employment opportunities via the provision of 5 fixed time staff.
- 16.1 Policy TB12 of the Wokingham Borough Council MDD, requires planning applications for all major development (both commercial and residential) in Wokingham Borough to submit an employment skills plan (ESP) with a supporting method statement post permission or alternatively provided an employment skills contribution (ESC) for the Council to provide local opportunities for employment/ vocational skills.
- 16.2 ESCs/ ESPs are worked out using the Construction Industry Training Board (CITB) benchmarks which are based on the value of construction. Planning applicants will need to submit an estimated construction value for the development or this value can be calculated using the proposed floor space in the planning application and applying BCIS industry standard build costs (£1025 m²).
- 16.3 The number of employment and training outcomes for the site specific ESP will be derived by applying the value of construction for the development to the benchmarks set out in the attached guidance. Organisations are required to provide a Method Statement setting out how they would intend to deliver the ESP.
- 16.4 The applicant has agreed to engage into a S106 legal obligation to secure an ESP, or contribution in lieu, of which specific figure will be calculated once a construction value can be derived from the gross proposed floorspace.
- 16.5 The applicants/owners bound by the planning obligation will be available to communicate progress on the ESP with the Economic Prosperity and Place team of the Council at any time but will be required to provide regular status reports on the progress on delivering the ESP at pre-agreed intervals.
- 16.6 Primarily, before start on site and 50%, and 75% of construction of the development. If the applicants/owners bound by the planning obligation elects to deliver the ESP rather than pay the ES Contribution in lieu, the applicants/owners bound by the planning obligation will be required to notify the Council in writing of the trigger points set out in the previous sentence and deliver the ESP in accordance with the KPIs. This will include an update of the ESP demonstrating the achievements and providing evidence against each of the agreed employment and skills areas and KPIs.
- 16.7 Given the applicant's agreement to engage in a S106 on the matters above, the requirements of TB12 are met and the proposal is policy compliant in this respect.

Planning Balance

- 17.0 The Council is currently unable to demonstrate a 5-year supply of deliverable housing sites. Consequently, the tilted balance, as advocated by paragraph 11d of the NPPF is triggered and planning permission should be granted unless any adverse impacts of doing so would **significantly and demonstrably** outweigh the benefits, when assessed

against the policies of the NPPF taken as a whole. The additional equivalent of 13 dwellings weighs strongly in favour of the proposal.

- 17.1 It is further appreciated that the proposal would equally contribute to the borough's demonstrated need for extra-care facilities of high quality through the provision of 17 care apartments in total with a net gain of 13 care apartments. This weighs substantially in favour of the proposal.
- 17.2 The proposal will redevelop the existing northern wing of Thamesfield of limited design merit with a highly sustainable and contemporary addition, subsequently facilitating the continued viability of the wider Integrated Retirement Community as well as external amenity benefits for its residents via the creation of a high-quality courtyard and permeable walking route.
- 17.3 Whilst the proposal would have a limited to moderate less-than-substantial harm to the Remenham Conservation Area, Henley Bridge Conservation Area and Thamesfield, a NDHA (conflicting with TB24 of the MDD Local Plan) as well as provide a limited degree of conflict with CP3(a), the proposal would not result in significant wider visual or spatial character harm given the site's existing characteristics amongst a plethora of large structures insofar as to stand contrary to CP1 and CP3 of the Core Strategy when viewed collectively. Furthermore, in the context of the built form on site and directly adjoining the redevelopment of the north of the site would not harm the openness of the Green Belt. The public benefits associated with the provision of required care apartments, contribution to housing land supply, highly sustainable development (in terms of built fabric and location) and improved landscaping and communal areas (including BNG) collectively outweigh the less than substantial harm outlined in heritage terms. Notwithstanding, the limited harms identified above in combination are afforded moderate weight against the scheme.
- 17.4 Further in favour of the proposal, it will deliver 17 high-quality specialist Integrated Retirement Community apartments that attract positive weight given the Council's own LHNA acknowledges net need. The proposal complies with development plan policies CP2 and TB09 which aim to provide choices of accommodation for vulnerable groups including older people. The proposal is also broadly consistent with the intents of the NPPF in terms of provision of specialist care apartments and not introducing an isolated care apartments in the countryside given the site's proximity to a large settlement and existing facilities on site. This attracts significant weight on balance.
- 17.5 The site in terms of its location would be sustainably located and well served by reliable and frequent public transport services with all day-to-day facilities available within adjoining Henley. The site's sustainable location attracts moderate weight in the planning balance in favour the proposal, at the upper end of the weighing scale considering the site's existing use and facilities within. This is afforded moderate positive weight on balance given the scale of the proposal.
- 17.6 In terms of economic benefits, the development would bring advantages and opportunities in respect of a net increase of five jobs as well as short term opportunities for construction jobs/ material expenditure. Further, given the Integrated Retirement Community is of private nature, it will generate business rates which are directly payable to the Council. The economic benefits of the proposal attracts moderate weight in providing residents of the Borough to work locally, which is further bolstered by securing employment and skills delivery via planning obligation.

- 17.7 Finally, with respect to environmental benefits the proposal would provide on-site biodiversity net gains via habitat creation, increase the permeable area of the site via landscaping and the removal of hard surfacing, increase flood capacity. The proposed buildings would be a standout example of sustainable development, notably exceeding the requirements of BREEAM Excellent at an 78% betterment than building regulations (75% secured by condition). This decreases the overall retirement village's carbon footprint, and constitutes highly sustainable development which is afforded significant weight on balance in accordance with the NPPF.
- 17.8 In applying significant weight to the provision of specialist housing for older people and a strong contribution to housing land supply in combination with those benefits outlined above, taking into account the Council's inability to demonstrate a five-year supply of housing, it is considered that any adverse impacts of the proposal would not significantly or demonstrably outweigh the benefits. Overall, the benefits of the scheme are judged to substantially outweigh the less than substantial harm identified in relation to heritage considerations, visual change from a single public vantage point, limited neighbouring amenity impacts, and minor technical conflict with the spatial strategy. On this basis and given that the proposal accords with the development plan as a whole save for limited conflict with CP11 and TB24, the application is acceptable on balance and is therefore recommended for approval.

The Public Sector Equality Duty (Equality Act 2010)

In determining this application the Council is required to have due regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief. There is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application and there would be no significant adverse impacts upon protected groups as a result of the development.

Conditions / informatives

APPROVAL subject to the following conditions and informatives:

1. Timescale

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: In pursuance of s.91 of the Town and Country Planning Act 1990 (as amended by s.51 of the Planning and Compulsory Purchase Act 2004).

2. Approved details

This permission is in respect of the submitted application plans and drawings named and numbered:

Site Location Plan	2212-P-001	2212-P-001 - 01
Proposed Site Plan	2212-P-100	2212-P-100 - 02
Proposed Plans – Basement Floor	2212-P-200	2212-P-200 - 01
Proposed Plans – Ground Floor	2212-P-201	2212-P-201 - 02
Proposed Plans – First Floor	2212-P-202	2212-P-202 - 01
Proposed Plans – Second Floor	2212-P-203	2212-P-203 - 01
Proposed Plans – Roof Plan	2212-P-204	2212-P-204 - 01
Proposed Site Section AA	2212-P-300	2212-P-300 - 02
Proposed Site Section BB	2212-P-301	2212-P-301 - 02
Proposed South Elevations	2212-P-350	2212-P-350 - 03
Proposed East and West Elevations	2212-P-351	2212-P-351 - 03
Proposed North Elevations	2212-P-352	2212-P-352 - 03
Illustrative masterplan	RETH3002 rev B	RETH3002 rev C

As received by the Local Planning Authority on 11/12/2024, 18/12/2024, 10/04/2025, 22/09/2025 and 24/09/2025.

The development shall be carried out in accordance with the approved details unless other minor variations are agreed in writing after the date of this permission and before implementation with the Local Planning Authority. *Reason: For the avoidance of doubt and to ensure that the development is carried out in accordance with the application form and associated details hereby approved.*

3. Materials

Prior to the commencement above slab level for the approved development, samples and details of the materials to be used in the construction of the external surfaces of the buildings (including ancillary buildings) shall have first been submitted to and approved in

writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure a high quality development in accordance with Wokingham Borough Core Strategy Policies CP1 and CP3, Borough Design Guide, CC04 and CC05 of the Managing Development Delivery Local Plan (Feb 2014)

4. Construction Management

Before the development hereby permitted is commenced a Construction Management Plan in shall have be submitted to and approved in writing by the Local Planning Authority. Construction shall not be carried out otherwise than in accordance with the approved CMP. The CMP shall include the following matters:

- i) a construction travel protocol or Green Travel plan for the construction phase including details of parking and turning for vehicles of site personnel, operatives and visitors;
- ii) loading and unloading of plant and materials;
- iii) storage of plant and materials;
- iv) programme of works / phasing / lorry routing and potential numbers (including measures for traffic management and operating hours);
- v) piling techniques including types of piling rig and earth moving machinery;
- vi) provision of boundary hoarding;
- vii) protection of the aquatic environment in terms of water quantity and quality;
- viii) details of proposed means of dust suppression and noise mitigation;
- ix) details of measures to prevent mud from vehicles leaving the site during construction;
- x) details of any site construction office, compound and ancillary facility buildings. These facilities shall be sited away from woodland areas;
- xi) lighting on site during construction (including temporary);
- xii) measures to ensure no on site fires during construction
- xiii) monitoring and review mechanisms;
- xiv) implementation of the CMP through an environmental management system;
- xv) details of the haul routes to be used to access the development;
- xvi) details of the temporary surface water management measures to be provided during the construction phase;
- xvii) details of the excavation of materials and the subsurface construction methodology

xviii) appointment of a Construction Liaison Officer. Any deviation from this Statement shall be first agreed in writing with the Local Planning Authority.

xix) The timing of the works

xx) The measures to be used during the development in order to minimise environmental impact of the works (considering both potential disturbance and pollution)

Reason: To protect occupants of nearby dwellings and protected species from noise and disturbance during the construction period, in the interest of highway safety and convenience and to minimize the environmental impact of the construction phase in accordance with Wokingham Borough Core Strategy Policies CP1, CP3, CP6 and CP7 and TB23 of the Managing Development Delivery Local Plan Policy.

5. Construction Times

No work relating to the development hereby approved, including preparation prior to building operations, shall take place other than between the hours of 08:00 am and 18:00 pm Monday to Friday and 08:00 am to 1 pm Saturdays and at no time on Sundays or Bank or National Holidays.

Reason: To protect the occupiers of neighbouring properties from noise and disturbance outside the permitted hours during the construction period. Relevant Policies: Core Strategy policies CP1 and CP3.

6. Landscape details (Large scale)

Notwithstanding the approved details, prior to the commencement above slab level of the development, full details of both hard and soft landscape proposals shall be submitted to and approved in writing by the local planning authority. These details shall include, as appropriate, proposed finished floor levels or contours, means of enclosure, car parking layouts, other vehicle and pedestrian access and circulation areas, hard surfacing materials and minor artefacts and structure (e.g. furniture, play equipment, refuse or other storage units, signs, lighting, external services, etc). Soft landscaping details shall include planting plan, specification (including cultivation and other operations associated with plant and grass establishment), schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate, and implementation timetable.

All hard and soft landscape works shall be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a timetable approved in writing by the local planning authority. Any trees or plants which, within a period of five years after planting, are removed, die or become seriously damaged

or defective, shall be replaced in the next planting season with others of species, size and number as originally approved and permanently retained.

Reason: To ensure adequate planting in the interests of visual amenity in accordance with Core Strategy policy CP3 and Managing Development Delivery Local Plan policies CC03 and TB21 (and TB06 for garden development).

7. Trees and Landscape Retention

No trees, shrubs or hedges within the site which are shown as being retained on the approved plans shall be felled, uprooted willfully damaged or destroyed, or removed without previous written consent of the local planning authority; any trees, shrubs or hedges removed without consent or dying or being severely damaged or becoming seriously diseased within 5 years from the completion of the development hereby permitted shall be replaced with trees, shrubs or hedge plants of similar size and species unless the local planning authority gives written consent to any variation.

Reason: To secure the protection throughout the time that development is being carried out, of trees, shrubs and hedges growing within the site which are of amenity value to the area in accordance with Core Strategy policy CP3 and Managing Development Delivery Local Plan policies CC03 and TB21.

8. Protection of Existing Trees

a) No development or other operations shall take place except in complete accordance with the BS:5837 'Arboricultural Impact Assessment JBL4752_770 V2 Dec 24' (hereinafter referred to as the Approved Scheme).

b) No operations shall commence on site in connection with development hereby approved (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and or widening or any other operation involving use of motorised vehicles or construction machinery) until the tree protection works required by the Approved Scheme are in place on site.

c) No excavations for services, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, lighting of fires or disposal of liquids shall take place within an area designated as being fenced off or otherwise protected in the Approved Scheme.

d) The fencing or other works which are part of the Approved Scheme shall not be moved or removed, temporarily or otherwise, until all works including external works have been completed and all equipment, machinery and surplus materials removed from the site,

unless the prior approval in writing of the local planning authority has first been sought and obtained.

Reason: To secure the protection throughout the time that the development is being carried out of trees shrubs or hedges growing within or adjacent to the site which are of amenity value to the area, and to allow for verification by the local planning authority that the necessary measures are in place before development and other works commence

Relevant policy: Core Strategy policy CP3 and Managing Development Delivery Local Plan policies CC03 and TB21.

9. Landscape Management Plan

Prior to the commencement above slab level of the development a landscape management plan, including long term design objectives, management responsibilities, timescales and maintenance schedules for all landscape areas shall be submitted to and approved in writing by the local planning authority. The landscape management plan shall be carried out as approved for the lifetime of the development.

Reason: In order to ensure that provision is made to allow satisfactory maintenance of the landscaping hereby approved. Relevant policy: Core Strategy policy CP3 and Managing Development Delivery Local Plan policies CC03 and TB21.

10. Contamination

In the event that contamination is found at any time when carrying out the approved development it must be reported in writing immediately to the Local Planning Authority. Any subsequent investigation/remedial/protective works deemed necessary by the LPA shall be carried out to agreed timescales and approved by the LPA in writing. If no contamination is encountered during the development, a letter confirming this fact shall be submitted to the LPA upon completion of the development.

Reason: To ensure any contamination on the site is remedied to protect the existing / proposed occupants of the application site and adjacent land in accordance with Wokingham Borough Core Strategy Policy CP1 and CP3.

11. Cycle Parking

The proposed development (restricted to the proposed built fabric) shall not be occupied until the cycle parking has been implemented / installed in accordance with the approved details. The cycle parking shall be permanently retained and delivered in accordance with the approved plans.

Reason: In order to ensure the development contributes towards achieving a sustainable transport system and to provide parking for cycles in accordance with Wokingham Borough Core Strategy Policies CP1 and CP6, the Parking Standards Study within the Borough Design Guide 2010 and CC07 of the Managing Development Delivery Local Plan (Feb 2014).

12. Vehicle parking

The hereby approved development (restricted to the proposed built fabric) shall not be occupied until the parking and turning areas to serve it including any unallocated spaces have been provided in accordance with the approved details and the provision shall be retained thereafter. The vehicle parking shall not be used for any other purposes other than parking and the turning spaces shall not be used for any other purposes than turning.

Reason: In the interests of highway safety and convenience in accordance with Wokingham Borough Core Strategy Policies CP1 and CP6, CC07 of the Managing Development Delivery Local Plan (Feb 2014) and the Borough Design Guide 2010.

13. Habitat Management and Monitoring Plan

A habitat management and monitoring plan (HMMP) shall be submitted to, and be approved in writing by, the local planning authority prior to commencement of the development. The content of the HMMP shall include the following.

- a) Description and evaluation of features to be managed.
- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management – to include on-site measures necessary to deliver biodiversity net gain.
- d) Appropriate management options for achieving aims and objectives
- e) Prescriptions for management actions.
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- g) Details of the body or organization responsible for implementation of the plan
- h) Ongoing monitoring and remedial measures.
- l) Long term design objectives, management responsibilities, timescales and maintenance schedules for all landscape areas.

The HMMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the

management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the HMMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason: To secure the maintenance of the Biodiversity Net Gain on-site provision for a minimum period of 30 years. Relevant policy: NPPF Section 15 (Conserving and Enhancing the Natural Environment).

14. Lighting Design (Biodiversity)

Prior to occupation (restricted to the proposed built fabric), a “lighting design strategy for biodiversity” for the hereby approved scheme shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- a) identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason: To ensure that the proposal is in accordance with Section 41 NERC Act re. UK Biodiversity Action Plan Priority Species (Species of Principal Importance) and complies with Planning Policies for Wildlife including CP7 of the Wokingham Borough Core Strategy (2010) and TB23 of the MDD (2014), and the National Planning Policy Framework which requires consideration of the potential biodiversity gains that can be secured within developments.

15. Ecological Permeability

Prior to commencement of development above slab level a detailed scheme to maintain the ecological permeability of the site (especially with regard to reptiles and hedgehogs) and provide species specific measures for bats, birds, and stag beetles shall be submitted to and approved in writing by the local planning authority. The mitigation and contingency measures contained within the plan shall be implemented in accordance with the approved plan unless otherwise approved in writing by the local planning authority.

Reason: To ensure that the proposal is in accordance with Section 41 NERC Act re. UK Biodiversity Action Plan Priority Species (Species of Principal Importance) and complies with Planning Policies for Wildlife including CP7 of the Wokingham Borough Core Strategy (2010) and TB23 of the MDD (2014), and the National Planning Policy Framework which requires consideration of the potential biodiversity gains that can be secured within developments.

16. Bat Licence:

No development works hereby permitted shall commence until a licence for development works affecting bats has been obtained from the Statutory Nature Conservation Organisation (Natural England) and a copy has been submitted to and approved in writing by the council. Thereafter mitigations measures approved in the licence shall be maintained in accordance with the approved details. Should conditions at the site for bats change and / or the applicant conclude that a licence for development works affecting bats is not required the applicant is to submit a report to the council detailing the reasons for this assessment and this report is to be approved in writing by the council prior to commencement of works.

Reason: The building to be demolished hosts a bat roost which will be affected by the proposals. This condition will ensure that bats, a material consideration, are not adversely impacted upon by the proposed development, and that the Council demonstrates that the council has fulfilled its duties under the 2017 Habitat Regulations.

17. Noise Management - Plant

Combined operational noise from all fixed plant shall not exceed: 35 dB(A) LAeq,1hr during daytime (07:00–23:00) and 33 dB(A) LAeq,15min during night-time (23:00–07:00) at 1 metre from the nearest noise-sensitive façade. Tonal or intermittent sources must include character corrections in accordance with BS 4142.

Reason: To protect the occupants of nearby residential properties and future occupiers of the proposed development from noise. Relevant policies: Core Strategy policies CP1 and CP3 and Managing Development Delivery Local Plan policy CC06.

18. Odour Extraction details

Prior to commencement of works above slab level restricted to the proposed built fabric the details of fume extraction, mechanical ventilation and filtration equipment shall be submitted to and approved in writing by the Local Planning Authority. The equipment shall be installed prior to the first occupation of the building (restricted to the proposed built fabric) in accordance with the approved details and thereafter be retained, operated and maintained in its approved form and in accordance with the manufacturer's recommendations for so long as the use hereby permitted remains on site.

Reason: To ensure that no nuisance or disturbance is caused to the occupiers of neighbouring properties. Relevant policy: Core Strategy policies CP1 and CP3.

19. Acoustic Design Details

Prior to commencement of development above slab level, detailed specifications for glazing, façade elements, and ventilation strategy shall be submitted and approved to demonstrate compliance with BS 8233 internal noise criteria (with AVO Guide relaxation for overheating mitigation).

Reason: To protect the occupants of nearby residential properties and future occupiers of the proposed development from noise. Relevant policies: Core Strategy policies CP1 and CP3 and Managing Development Delivery Local Plan policy CC06.

20. Flood Risk Assessment

The development shall be carried out in accordance with the FRA detailed above and the following mitigation measures it details:

- Finished floor levels shall be set no lower than 33.86 metres above Ordnance Datum (AOD)
- There shall be no raising of existing ground levels on the site within the 1% Annual Exceedance Probability (AEP) design flood event, including a 31% climate change (CC) allowance. If land raising is proposed within 1% AEP plus 31% CC extent, then level for level floodplain compensation must be provided.

These mitigation measures shall be fully implemented prior to occupation (restricted to the proposed built fabric) and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reason: This condition seeks to reduce the risk of flooding to the proposed development and future occupants and prevent an increase in flood risk elsewhere, ensuring that the

flow of flood water is not impeded, and the proposed development does not cause a loss of floodplain storage - In line with paragraphs 178 and 181 of the NPPF.

21. Surface Water Drainage

The development hereby consented shall be carried out in accordance with “Drainage Strategy technical note, prepared Mason Navarro Pledge, reference: 222351 rev 05, September 2025” with all mitigation measures delivered prior to first occupation (restricted to the proposed built fabric) and maintained for the lifetime of the development.

Reason: This is to prevent increased flood risk from surface water run-off. Relevant policy: NPPF (2019) Section 14 (Meeting the Challenge of Climate Change, Flooding and Coastal Change), Core Strategy policy CP1 and Managing Development Delivery Local Plan policies CC09 and CC10.

22. Use

The development hereby permitted shall be used only as an Integrated Retirement Community falling within the C2 use class (or any other subsequent amendment to the Use Class Order) and for no other purpose without the express approval of the Local Planning Authority.

Reason: To safeguard the provision of specialist care facilities in accordance with Core Strategy Policy CP1, CP2 and CP3 of which was afforded appropriate weight in the planning balance to justify the development outside of settlement limits.

23. Low and zero-carbon technology

Prior to the commencement of development, in accordance with the principles outlined within ‘5524896-HLE-XX-XX-RP-ST-357000 P04’ a final scheme for achieving a 75% reduction in the predicted carbon emissions arising from operation of the development (limited to the building fabric subject to this permission) through the use of decentralised renewable and/or low carbon sources (as defined in the glossary of Planning Policy Statement: Planning and Climate Change (December 2007) or any subsequent version) shall be submitted to and approved in writing by the local planning authority. The approved scheme shall be implemented before the development is first occupied and shall remain operational for the lifetime of the development.

Reason: To ensure developments contribute to sustainable development in accordance with NPPF Section 14 (Meeting the Challenge of Climate Change, Flooding and Coastal Change), WBC Climate Emergency Action Plan, Core Strategy policy CP1, MDDL policy CC05 & the Sustainable Design and Construction Supplementary Planning Document.

24. Water Efficiency

Prior to the commencement of development, a specification achieving BREEAM WAT-01 Level 3 for water efficiency shall be submitted to and approved in writing by the local planning authority. The approved scheme shall be implemented before the development (restricted to the proposed built fabric) is first occupied and shall remain operational for the lifetime of the development.

Reason: To ensure developments contribute to sustainable development. Relevant policy: NPPF Section 14 (Meeting the Challenge of Climate Change, Flooding and Coastal Change), WBC Climate Emergency Action Plan, Core Strategy policy CP1, Managing Development Delivery Local Plan policy CC04 & the Sustainable Design and Construction Supplementary Planning Document.

25. Communications Plan

No development shall take place until a Communications Plan has been submitted to and approved in writing by the Local Planning Authority. The Communications Plan shall specify methods of communication between local residents and the developer and/or contractors, including the creation of a liaison group to meet in accordance with an agreed schedule during construction. The Plan shall be carried out as approved until the final completion of the development.

Reason: In the interests of neighbouring amenity. Relevant policy: Core Strategy policies CP1, and CP3.

Informatives

1. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development.
2. This permission should be read in conjunction with the legal agreement under section 106 of the Town and Country Planning Act, the obligations in which relate to this development.
3. The applicant is reminded that, under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended), it is an offence to: deliberately capture, disturb, injure or kill great crested newts; damage or destroy a breeding or resting place; deliberately obstructing access to a resting or sheltering place. Planning consent for a development does not provide a defence against

prosecution under these acts. Ponds, other water bodies and vegetation, such as grassland, scrub and woodland, and also brownfield sites, may support great crested newts. Where proposed activities might result in one or more of the above offences, it is possible to apply for a derogation licence from Natural England or opt into Wokingham Borough Council's District Licence. If a great crested newt is encountered during works, all works must cease until advice has been sought from Natural England, as failure to do so could result in prosecutable offences being committed.

4. The applicant is reminded that this approval is granted subject to conditions which must be complied with prior to the development starting on site. Commencement of the development without complying with the pre-commencement requirements may be outside the terms of this permission and liable to enforcement action. The information required should be formally submitted to the Council for consideration with the relevant fee. Once the details have been approved in writing the development should be carried out only in accordance with those details.

5. The applicant is reminded that should there be any change from the approved drawings during the build of the development this may require a fresh planning application if the changes differ materially from the approved details. Non-material changes may be formalised by way of an application under s.96A Town and Country Planning Act 1990.

6. Adequate precautions shall be taken during the construction period to prevent the deposit of mud and similar debris on adjacent highways. For further information contact the Highway Authority on tel.: 0118 9746000.

7. Whilst it would appear from the application that the proposed development is to be entirely within the curtilage of the application site, the granting of planning permission does not authorise you to gain access or carry out any works on, over or under your neighbour's land or property without first obtaining their consent, and does not obviate the need for compliance with the requirements of the Party Wall etc. Act 1996.

8. The development hereby permitted is liable to pay the Community Infrastructure Levy. The Liability Notice issued by Wokingham Borough Council will state the current chargeable amount. A revised Liability Notice will be issued if this amount changes. Anyone can formally assume liability to pay, but if no one does so then liability will rest with the landowner. There are certain legal requirements that must be complied with. For instance, whoever will pay the levy must submit an Assumption of Liability form and a Commencement Notice to Wokingham Borough Council prior to commencement of development, failure to do this will result in penalty surcharges being added. For more information see the Council's website - [Community Infrastructure Levy advice page](#). Please submit all CIL forms and enquiries to developer.contributions@wokingham.gov.uk.

9. Fire service access should comply with B5 of ADB Volume 2 2019 with additional local requirements below under the Berkshire Act 1986: Fire service vehicles currently operated by Royal Berkshire Fire & Rescue Service exceed the requirements stated in the current edition of Approved Document B. The applicant should be made aware of the following amendments:- The minimum carrying capacity for a pumping appliance is 16 tonnes. The minimum carrying capacity for a high reach appliance is 26 tonnes. Structures such as bridges should have the full vehicle carrying capacity. Any structural fire precautions and all means of escape provision will have to satisfy Building Regulation requirement. These matters are administered by the local authority Building Control or approved inspectors, who you are advised to contact in this regard.

10. **Biodiversity Net Gain:** The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition “(the biodiversity gain condition”) that development may not begin unless: a) a Biodiversity Gain Plan has been submitted to the planning authority, and b) the planning authority has approved the plan. The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Wokingham Borough Council.

11. **Biodiversity Net Gain Exemptions and Transitional Arrangements:** There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are set out in [paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990](#) the [Biodiversity Gain Requirements \(Exemptions\) Regulations 2024](#). and [The Environment Act 2021 \(Commencement No. 8 and Transitional Provisions\) Regulations 2024](#).

12. **Biodiversity Net Gain Irreplaceable Habitat:** If the onsite habitat includes irreplaceable habitat (within the meaning of [The Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#)) there are additional requirements. The Biodiversity Gain Plan must include, in addition to information about steps taken or to be taken to minimise any adverse effect of the development on the habitat, information on arrangements for compensation for any impact the development has on the biodiversity of the irreplaceable habitat.

13. The planning authority can only approve a Biodiversity Gain Plan if satisfied that the adverse effect of the development on the biodiversity of the irreplaceable habitat is minimised and appropriate arrangements have been made for the purpose of compensating for any impact which do not include the use of biodiversity credits.

14. **Biodiversity Net Gain Section 73(2D):** If planning permission is granted on an application made under section 73 of the Town and Country Planning Act 1990 (application to develop land without compliance with conditions previously attached) and a Biodiversity Gain Plan was approved in relation to the previous planning permission (“the earlier Biodiversity Gain Plan”) there are circumstances when the earlier Biodiversity Gain Plan is regarded as approved for the purpose of discharging the biodiversity gain condition subject to which the section 73 planning permission is granted. Those circumstances are that the conditions subject to which the section 73 permission is granted:

- i. do not affect the post-development value of the onsite habitat as specified in the earlier Biodiversity Gain Plan, and in the case of planning permission for a development where all or any part
- ii. of the onsite habitat is irreplaceable habitat the conditions do not change the effect of the development on the biodiversity of that onsite habitat (including any arrangements made to compensate for any such effect) as specified in the earlier Biodiversity Gain Plan.

15. **Biodiversity Net Gain Phase Development:** If the permission which has been granted has the effect of requiring or permitting the development to proceed in phases, the modifications in respect of the biodiversity gain condition which are set out in Part 2 of [The Biodiversity Gain \(Town and Country Planning\) \(Modifications and Amendments\)](#)

[\(England\) Regulations 2024](#) apply. In summary: Biodiversity gain plans are required to be submitted to, and approved by, the planning authority before development may be begun (the overall plan), and before each phase of development may be begun (phase plans).

Appendix C Decision Notice





**WOKINGHAM
BOROUGH COUNCIL**

TOWN AND COUNTRY PLANNING ACTS

**TOWN AND COUNTRY
PLANNING (ENGLAND) 1990**

Jane Harrison
Barton Willmore
The Blade
Abbey Square
Reading
RG1 3BE

NOTIFICATION OF REFUSAL OF PLANNING PERMISSION

Application Number: 243125
Applicant Name: -
Site Address: Thamesfield Retirement Village, Remenham, RG9 2LX
Proposal: Full application for proposed part demolition of existing building and replacement with a three-storey extension to provide extra-care units, with associated soft and hard landscaping works; provision of additional vehicle parking, bin stores and ancillary structures; and alterations to existing basement.
Date of Decision: 11 December 2025

Wokingham Borough Council in pursuance of its powers under the above Acts and Regulations hereby **refuses permission** for carrying out the above development as stated in the application and the accompanying plans submitted to the Council for the reason(s) specified hereunder.

Reasons

1. The proposed development, by reason of its bulk, scale, height, and proximity to neighbouring dwellings at Remenham Row, would result in an unacceptable level of overlooking and perceived loss of privacy to the front elevations of those properties, together with an unneighbourly overbearing impact. The development would result in material harm the living conditions of existing residents. The proposal is therefore contrary to Section 12 of the NPPF, Policy CP3 of the Wokingham Core Strategy and the Borough Design Guide.
2. The proposed development, by reason of its scale, height, bulk and massing would fail to preserve or enhance the character or appearance of the Remenham and Henley Bridge Conservation Area and the Henley on Thames Conservation Area. This would result in limited-moderate

less-than-substantial harm to the significance of these designated heritage assets. When applying paragraph 215 of the National Planning Policy Framework, the identified harm is not outweighed by the public benefits of the proposal. Accordingly, the proposal conflicts with the statutory duty under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16 of the NPPF (2024), Policy CP3 of the Wokingham Core Strategy and Policy TB24 of the Managing Development Delivery Local Plan.

3. In the absence of a completed legal agreement, the proposed development fails to secure opportunities for training, apprenticeships and other vocational initiatives to develop local employability skills contrary to MDD Local Plan policy TB12.

4. In the absence of a completed legal agreement, the proposed development fails to mitigate the increases in demand on NHS services through failing to contribute towards the creation of additional clinical capacity at Bell or Hart GP Surgeries or an identified primary care estates project in the local area to serve the development. This is contrary to CP1 of the Core Strategy and the NPPF (2024).

5. In the absence of a completed legal agreement to secure biodiversity net gain monitoring, the proposed development fails to demonstrate and secure that there would be no long term biodiversity net loss as a result of the proposal by either on site mitigation or off-site compensation and how this would be managed, contrary to Core Strategy policy CP3 and CP7, MDD Local Plan Policy TB23 and the NPPF (2024).

Informatives

1. If you intend to submit an appeal to be considered as a Public Inquiry you must notify the Local Planning Authority (planning.appeals@wokingham.gov.uk) and Planning Inspectorate (inquiryappeals@planninginspectorate.gov.uk) at least 10 days before you submit the appeal.

2. This decision is in respect of the drawings and plans numbered

Site Location Plan 2212-P-001 – 01, Proposed Site Plan 2212-P-100 – 02, Proposed Plans – Basement Floor 2212-P-200 – 01, Proposed Plans – Ground Floor 2212-P-201 – 02, Proposed Plans – First Floor 2212-P-202 – 01, Proposed Plans – Second Floor 2212-P-203 – 01, Proposed Plans – Roof Plan 2212-P-204 – 01, Proposed Site Section AA 2212-P-300 – 02, Proposed Site Section BB 2212-P-301 – 02, Proposed South Elevations 2212-P-350 – 03, Proposed East and West Elevations 2212-P-351 – 03, Proposed North Elevations 2212-P-352 – 03 and Illustrative masterplan RETH3002 rev C received by the Local Planning Authority on 11/12/2024, 18/12/2024, 10/04/2025, 22/09/2025 and 24/09/2025.

3. If you intend to submit an appeal to be considered as a Public Inquiry you must notify the Local Planning Authority

(planning.appeals@wokingham.gov.uk) and Planning Inspectorate (inquiryappeals@planninginspectorate.gov.uk) at least 10 days before you submit the appeal.

4. The Council engages with all applicants in a positive and proactive way through specific pre-application enquiries and the detailed advice available on the Council's website. On this particular application, pre-application advice was sought and advice was given regarding the proposal, however, this did not override the concerns raised.

Signed

A handwritten signature in black ink, appearing to be 'JT', is displayed on a light green rectangular background.

Justin Turvey

Head of Development Management - Place & Growth

Date: 11 December 2025

PLEASE READ THE NOTES ISSUED WITH THIS DECISION NOTICE BELOW



WOKINGHAM BOROUGH COUNCIL

TOWN AND COUNTRY PLANNING ACTS TOWN AND COUNTRY PLANNING (ENGLAND) 1990

Other statutory legislation: This decision notice relates to the above stated acts and regulations only and does not constitute approval under any other legislation.

The Town & Country Planning (Development Management Procedure) Order: This decision has been made in accordance with the requirements of the National Planning Policy Framework (NPPF) and in the requirement to work with the applicant in a positive and proactive manner.

Officer Report: An officer report explaining the decision will be available to view online.

Purchase notices: If either the local planning authority or the Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that the owner can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted. In these circumstances, the owner may serve a purchase notice on the Council which will require the Council to purchase the owner's interest in the land in accordance with the provisions of Chapter I of Part VI of the Town and Country Planning Act 1990.

Appeals to the Secretary of State: If your application has been **refused** by the Borough Council or **granted subject to conditions** that you are not happy with, you have the right to appeal to the Planning Inspectorate (under Section 78 of the Town and Country Planning Act 1990). This must be within the timeframes set out below. Please note an extension of time for lodging an appeal is unlikely to be granted except in special circumstances.

12 weeks from the decision date above in the case of a refusal of a 'householder' application:
Being the refusal of an application for planning permission to alter or extend a house, or for works within the curtilage of a house; or,
Being the refusal to approve details submitted as required by a condition imposed on a permission granted for a householder application.

12 weeks from the decision date above in the case of a refusal of a 'minor commercial' application:
Being the refusal of an application for development of an existing building or part of a building currently in use for purposes in Use Classes A1, A2, A3, A4 and A5

where the proposal does not include a change of use, a change to the number of units, development that is not wholly at ground floor level and/or does not increase the gross internal area of the building.

6 months from the decision date above in the case of all other appeals made under s78(1) or s20 of the above Acts relating to a decision on a planning application or listed building/conservation area consent application.

6 months from the decision date above in the case of any appeal made under s78 (2) of the Act in respect of a failure to give a decision within the statutory period.

The Planning Inspectorate is an Executive Agency reporting to the Secretary of State for Communities and Local Government. The Inspectorate has an online appeals service with information and guidance about the process. You can submit [full application appeals](#) and [householder application appeals](#) with the new appeals service. [Other application types](#) should be submitted on the current appeal service. Alternatively, you can obtain a form from the Planning Inspectorate at Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN, 0303 444 5000 or through the [Inspectorate's website](#). Please note all documents will be published online by the Planning Inspectorate and therefore you should not include personal information you do not wish to be displayed in this way. This includes personal information of third parties.

In the event of a grant of planning permission, please note the following:

Community Infrastructure Levy (CIL): When planning permission is granted for a development that is CIL the Council will issue a liability notice as soon as practicable after the day on which the planning permission first permits development. Completing 'Form 2', the assumption of liability notice, is a statutory requirement for the liable party(ies) to be completed for all CIL liable applications. Advice on how the Regulations may impact you and how you can properly discharge the relevant legal requirements including paying any relevant CIL charge that may be due is available on our [Community Infrastructure Levy advice \(wokingham.gov.uk\)](http://wokingham.gov.uk) website pages.

Discharge of Conditions: This consent may contain conditions that require further approval by submission of an application for approval of details reserved by condition and the appropriate fee. Application forms can be obtained for this purpose by visiting the [Planning Portal](#).

Street Naming and Numbering for new dwellings: If this notice relates to approval of new dwellings, please ensure that you contact the Council at least 16 weeks before the commencement on site to arrange for an address and post code to be allocated. Details can be obtained from streetnamingandnumbering@wokingham.gov.uk. Failure to contact the street naming and numbering department at least 16 weeks before commencement on site will result in the addressing and post code for the development being delayed.

Access to privately owned land: The applicant is reminded that this permission does not give right of entry to land not in the ownership of the applicant. Permission must be sought from any other landowner(s) if access is required.

Gas Mains and Services: Building over a gas main or service that is located within your site could cause damage to pipework or potential gas leaks within buildings. You should check for information relating to services within your site at [Home - LinesearchbeforeUdig \(lsbud.co.uk\)](http://lsbud.co.uk) and contact the Plant Protection Team at SGN on 0800 912 1722 or plantlocation@sgn.co.uk. If necessary, contact National Gas Transmission for high pressure gas pipelines on box.assetprotection@nationalgas.com or 0800 970 7000.

Building Regulations: The development subject to this permission may also require Building Regulation approval to ensure it is built to national safety, design, and environmental standards. The Council's Local Authority Building Control (LABC) service offers a full range of plan approval, inspection, and associated services through an ISO9001 nationally accredited team of qualified building surveyors. These surveyors work closely with the Council's planning department to ensure the appropriate construction of your build. To find out more visit the Council's [Building Control website](#) or call 0300 790 0580 to speak to a member of the team.

Fire Regulations: In accordance with the Berkshire Act 1986, when Building Regulation applications are submitted for building(s) or extensions, the Local Authority will reject the plans unless, after consultation with the fire authority, they are satisfied that the plans show the following:

- i) That there will be adequate means of access for the fire brigade to the building(s) or the extended building(s); and,
- ii) That the building(s) or extension(s) will not render inadequate any existing means of access for the fire brigade to a neighbouring building.

Biodiversity Net Gain: The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition “(the biodiversity gain condition)” that development may not begin unless:

- a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Wokingham Borough Council.

Biodiversity Net Gain Exemptions and Transitional Arrangements: There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are set out in [paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990](#) the [Biodiversity](#)

[Gain Requirements \(Exemptions\) Regulations 2024](#), and [The Environment Act 2021 \(Commencement No. 8 and Transitional Provisions\) Regulations 2024](#).

Biodiversity Net Gain Irreplaceable Habitat: If the onsite habitat includes irreplaceable habitat (within the meaning of [The Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#)) there are additional requirements. The Biodiversity Gain Plan must include, in addition to information about steps taken or to be taken to minimise any adverse effect of the development on the habitat, information on arrangements for compensation for any impact the development has on the biodiversity of the irreplaceable habitat.

The planning authority can only approve a Biodiversity Gain Plan if satisfied that the adverse effect of the development on the biodiversity of the irreplaceable habitat is minimised and appropriate arrangements have been made for the purpose of compensating for any impact which do not include the use of biodiversity credits.

Biodiversity Net Gain Section 73(2D): If planning permission is granted on an application made under section 73 of the Town and Country Planning Act 1990 (application to develop land without compliance with conditions previously attached) and a Biodiversity Gain Plan was approved in relation to the previous planning permission (“the earlier Biodiversity Gain Plan”) there are circumstances when the earlier Biodiversity Gain Plan is regarded as approved for the purpose of discharging the biodiversity gain condition subject to which the section 73 planning permission is granted. Those circumstances are that the conditions subject to which the section 73 permission is granted:

- i. do not affect the post-development value of the onsite habitat as specified in the earlier Biodiversity Gain Plan, and
- ii. in the case of planning permission for a development where all or any part of the onsite habitat is irreplaceable habitat the conditions do not change the effect of the development on the biodiversity of that onsite habitat (including any arrangements made to compensate for any such effect) as specified in the earlier Biodiversity Gain Plan.

Biodiversity Net Gain Phase Development: If the permission which has been granted has the effect of requiring or permitting the development to proceed in phases, the modifications in respect of the biodiversity gain condition which are set out in Part 2 of [The Biodiversity Gain \(Town and Country Planning\) \(Modifications and Amendments\) \(England\) Regulations 2024](#) apply. In summary: Biodiversity gain plans are required to be submitted to, and approved by, the planning authority before development may be begun (the overall plan), and before each phase of development may be begun (phase plans).

Appendix D Site Demolition Plan

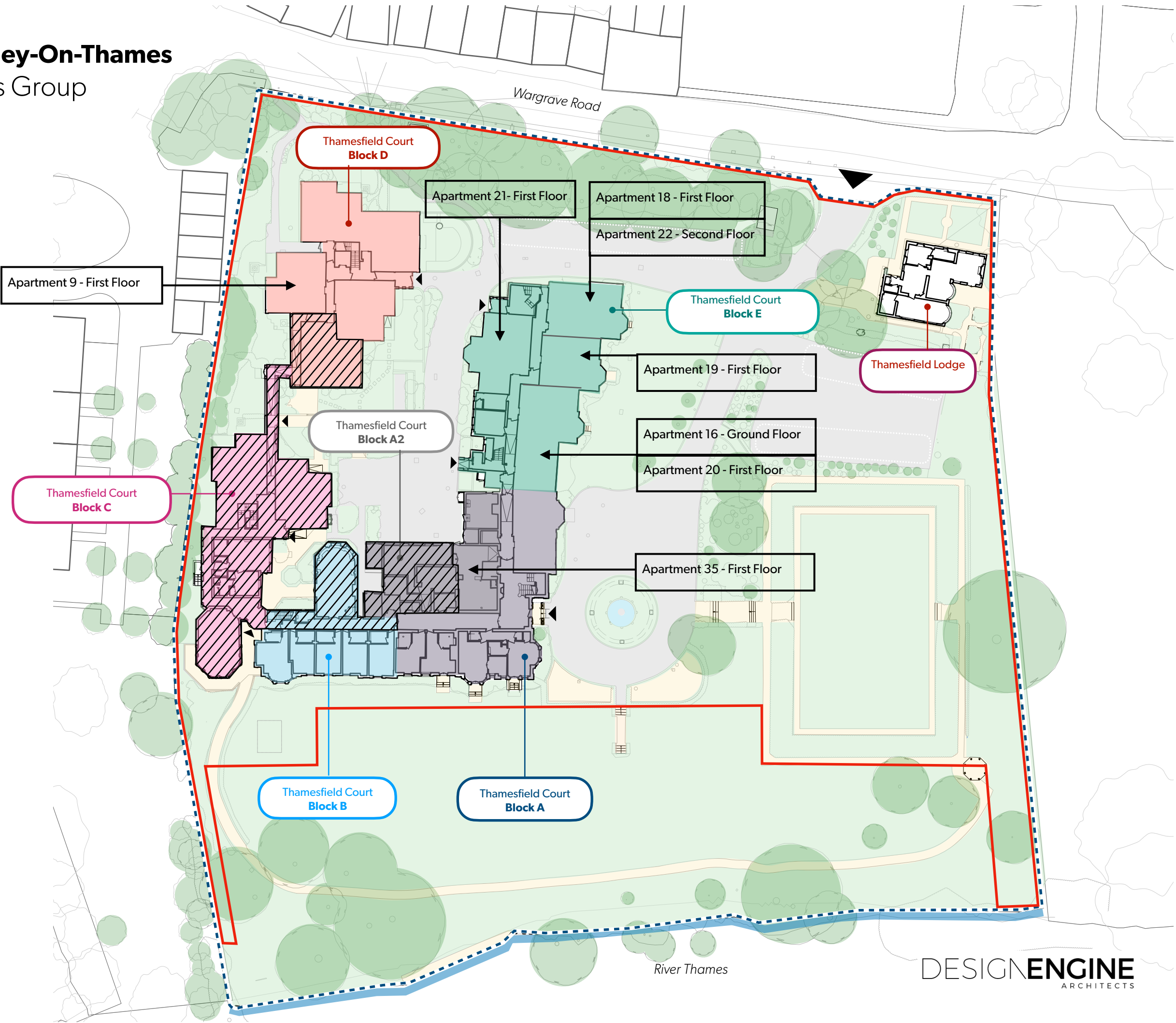
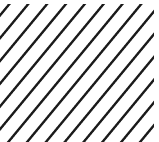


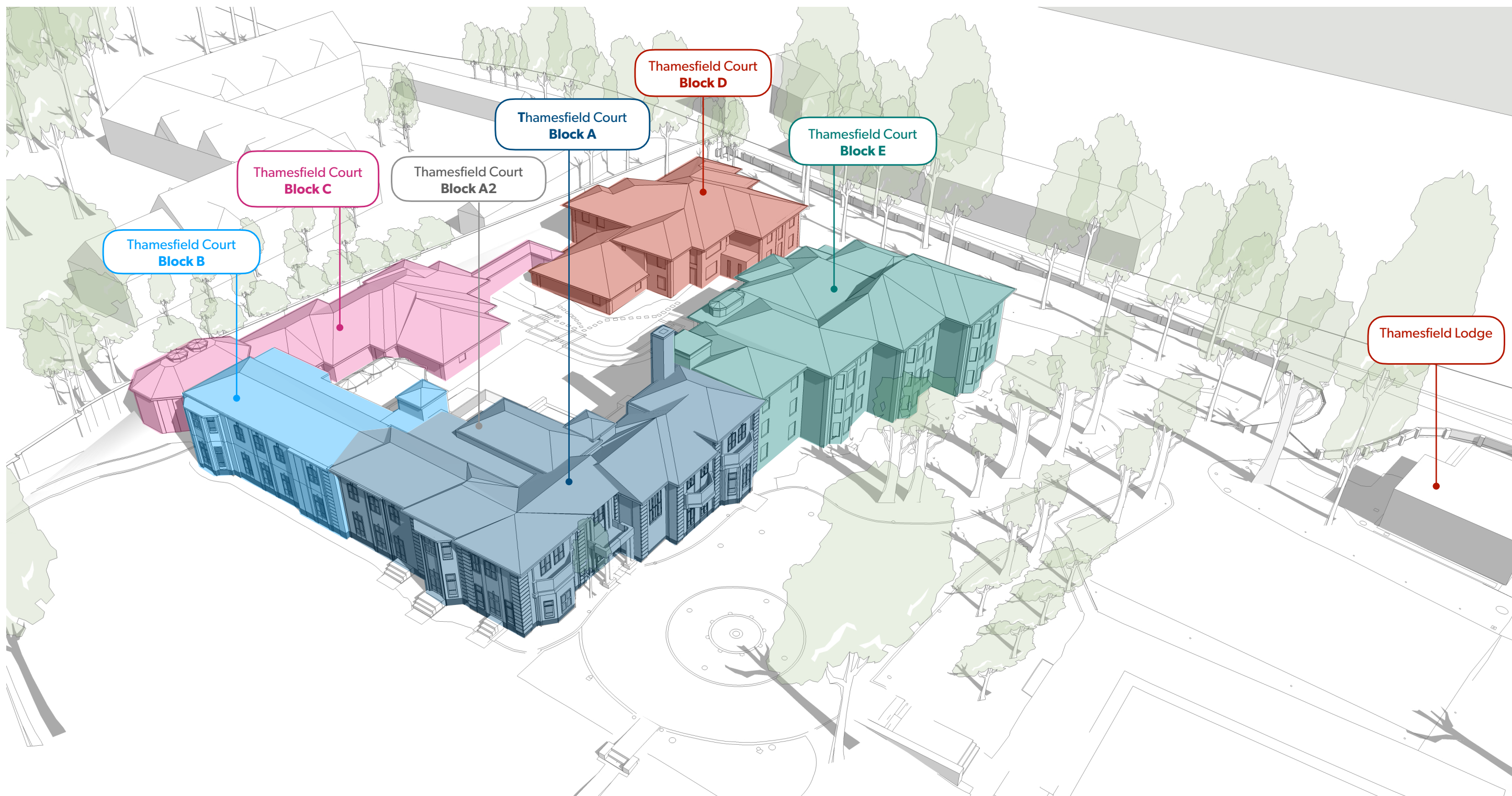
Thamesfield, Henley-On-Thames

Retirement Villages Group

For reference purposes only.
Do not scale

Extent of proposed demolition
shown hatched





For reference purposes only.
Do not scale

Appendix E Post development habitat survey (BNG)





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2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

- LEGEND**
- Site Boundary
 - New urban tree
 - Retained urban tree
 - New h2a - native hedgerow
 - New h2b - non-native and ornamental hedgerow
 - Retained h2b - non-native and ornamental hedgerow
 - g3c - other neutral grassland
 - g4 - modified grassland
 - h3h - mixed scrub
 - r1 (46) - freshwater, man made (ornamental pond)
 - u1 (847) - introduced shrub
 - u1b - developed land - sealed surface
 - u1b5 - buildings
 - u1c - artificial unvegetated, unsealed surface
 - w1h - other woodland; mixed



Client **Retirement Village Group**

Project **Thamesfield**

Project No. **ECO02776**

Title **Post-development Habitats**

Drawing No. ECO02776-0003	Figure No. 02	Revision 04	Status FINAL
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Date JUN 2026	Drawn By LP/GNL	Checked By EW	Revision By LP
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Scale @ A3 1:750	Datum OSGB 1936
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