



Ruhit Rehman,
The Planning Inspectorate,
c/o QUADIENT,
69 Buckingham Avenue,
Slough, SL1 4PN.

14.07.26

AM2P Ref: J.123
PINS Ref: APP/6011062

Dear Case Officer,

Re: Appeal 6011062 @ Thamesfield Retirement Village, Remenham

I write on behalf of Remenham Parish Council in order to object to the above planning appeal. The Parish Council is in full support of the objection letter submitted on behalf of residents at Remenham Row due to the significant detrimental impact the scheme will have upon their amenity levels but will not repeat those points as part of this submission.

A couple of comprehensive objection letters (dated 10.10.25 and 11.02.25) were submitted on behalf of the Parish Council as part of the planning application process. The Inspector is referred to these letters, as the objection points remain relevant and it is not intended to repeat their content below. The following submission instead attempts to address the specific points made in the Appellant's Statement on a number of matters.

In Chapter 7 of their Statement, the Appellants refer to the 'tilted balance', cross referring to paragraph 11(d) of the NPPF. This requires that in instances such as this, where the Council cannot demonstrate a 5-year housing land supply, planning permission should be granted unless one of the following two scenarios applies;

- i) *the application of Policies in the Framework that protect areas or assets of particular importance (footnote 7) provides a clear reason for refusing the development proposed*
- ii) *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, 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)*

Addressing these in turn;

The stated list of areas or assets of particular importance at footnote 7 include Heritage Assets. As a result, the impact of the proposal upon the two Conservation Areas, and

other heritage assets, is very relevant in this instance. The appeal site lies within the Remenham Bridge Conservation Area and contributes directly to the setting of the Henley-on-Thames Conservation Area.

The Council's Heritage Officer, having given the proposal careful consideration, recommended on 3rd Oct 2025 that the planning application should be refused. The 4 page consultation response also highlighted the existence of other Heritage assets in proximity of the site including many listed buildings and Thamesfield itself, a non-designated heritage asset.

The Inspector is encouraged to give the 3rd October 2025 response from the Council's Heritage Officer careful consideration. It explains why the Appellant's suggestion that Thamesfield should not be afforded non-designated heritage status, is not justified. As explained by the Heritage Officer;

'the LPA has consistently identified Thamesfield as NDHA throughout the process based upon sound evidence. As per the NPPF and NPPG it is for the LPA to identify heritage assets, not for an applicant whose interest lies in the adverse impact upon them.'

The Heritage Officer explains why the proposal would harm the NDHA as follows;

'Notwithstanding the concerns over the loss of existing fabric, the proposals would seek to effectively triple the height, scale and massing of the existing built-form. They would also result in a significant increase of plan-form density on the site. The proposed development would deviate from the established built height and scale of the site and seek to introduce a divergent form and appearance. Whilst of (sic) distinctly of a contemporary 'honest' appearance, the proposed form would undoubtedly be at odds with the extant and remaining form of the site and seek to introduce a great urban character. The blocky 'roof' form, that is the third storey, differs remarkably from all of the other existing elements on the site, which, no matter of their age, have sought to reflect the shallow pitched slated roof of the original 19th century building.....'

'The application's proposal of a replacement residential block in a contemporary language drastically contrasts with the host's (immediate and wider) architectural forms, that of a traditional 18th, 19th and early 20th century polite and domestic revival vernacular. The highly modernistic aesthetic introduces a bellicose form to the established architectural language with conflicts with traditional appearance the host setting. Whilst a contemporary approach could be considered to represent an 'honest' tact to building philosophy, it is clear in this instance the jarring nature of the architectural form is at odds with the contextual historic significance. These proposals present an antagonistic style of design which has a degree of outrecuidance. The resulting incongruity would be highly notable in the historic context and relationship to nearby heritage assets. The third storey of the proposed element is particularly problematic, and whilst the dark colouring is purported to reflect the slate roofs of Thamesfield, the black-grey block form seeks to dominate and overshadow the host and vicinity.'

Whilst the Council's 2nd reason for refusal in the decision notice focuses upon the harmful impact upon the Conservation Areas, it is also considered necessary to assess the impact upon the host NDHA, and for reasons explained by the Council's Heritage Officer, there will be harm caused to it. When combined with the harm caused to the Conservation Areas (as explained at length within the Heritage Officer's consultation response), it is strongly considered that the application of Heritage policies in the Framework provide a

clear reason for refusing the development proposed. It therefore follows that the 'tilted balance' should not be engaged, in accordance with the requirements of paragraph 11(d) of the NPPF.

It is recognised that paragraph 215 of the NPPF advises that when proposed development leads to 'less than substantial harm' to the significance of a heritage asset, this harm should be weighed against the public benefits. And at paragraph 216, the NPPF notes that a balanced judgement will be required when assessing the harm to non-designated heritage assets. Such a balance will be undertaken later in this submission.

Before turning to the balance, one of the other listed areas or assets of particular importance, at footnote 7 of paragraph 11 (d)(i), is Green Belt. The Appellants suggest that the proposed development is not 'inappropriate development' in the Green Belt on the basis that they are classing the works as a 'redevelopment' of the site. However, as explained within previous objection letters, the proposed works clearly involve an 'extension' to the existing building at Thamesfield – this is how it was described on the application forms and in the Applicant's own DAS. As a result, the NPPF advises at paragraph 154 (c) that in order not to be inappropriate, such works should not result in disproportionate additions over and above the size of the original building.

As explained in previous objection letters, the proposed extension will result in a building that is over 6 times as large as that which was in place on site in the 1980s. The increase beyond the original is very clearly disproportionate. It follows that the works clearly do not adhere with the requirements of paragraph 154 (c) and as a result the works have to be classed as 'inappropriate development' in Green Belt terms.

The Appellants also attempt to suggest that the works are not inappropriate development due to the 'Grey Belt' nature of the site. At paragraph 7.1.10 – 7.1.28 the Appellants set out their case for why the site should be classed as Grey Belt. Table 3 of the Appellant's Statement suggests that consideration of Purpose (d) (to preserve the setting and special character of historic towns) is not relevant in this instance due to Remenham being a village. But this ignores the fact that the appeal site is directly opposite, and easily visible from a historic town – Henley on Thames. Regardless of where the extension is proposed, the appeal site itself includes a considerable riverside frontage, contributing significantly to the setting of Henley-on-Thames. The Council's Heritage Officer has explained within their consultation response, why even the proposed works will harm the Henley on Thames Conservation Area. It therefore follows that the appeal site does contribute strongly towards the purpose of preserving the setting and special character of historic towns, and the site should not be classed as a Grey Belt site accordingly.

The Appellants also fail to make reference to the NPPF definition of Grey Belt sites requiring that there are no 'footnote 7' areas involved for which the application of NPPF policies would provide a strong reason for refusing or restricting development. For reasons explained above, that would be the case in this instance due to Heritage constraints.

For the two above reasons, the site should not be defined as Grey Belt land in this instance, and it follows that the development proposed should be classed as 'inappropriate development' in NPPF Green Belt terms.

One further point with regards to the Appellant's claimed Grey Belt definition relates to the NPPF 'Golden Rules' requirements at paragraph 156 – 157 to introduce affordable housing at 15 percentage points higher than required by development plan policies. The

appellants suggest they do not need to provide any affordable housing, because there isn't an existing policy requirement for C2 provision to provide affordable housing. But that's the point! The Golden Rules are intended to ensure that major developments that come forward on Green Belt sites provide for notably more than a normal housing (C2 or otherwise) development – to justify such development in the Green Belt. And additional affordable housing is one of the ways in which this is enabled/required. As a result, failure to adhere with the 'Golden Rules' requirements is a further reason why the proposed development is unacceptable in Green Belt terms.

It therefore follows that in order for the scheme to be appropriate in Green Belt terms, in accordance with the NPPF, very special circumstances will need to be demonstrated. The Appellants set out their suggested very special circumstances at 7.1.31 of their Statement. These are all repeated within the Appellant's overall benefits and adverse impacts 'planning balance' table at Table 4 of their Statement.

The very special circumstances raised by the Appellant are referred to in table 1 below, and for reasons set out, are not considered to clearly outweigh the harm to the Green Belt, and other harm resulting from the proposal, as required by paragraph 153 of the NPPF.

Due to the proposal's conflict with criterion (i) of paragraph 11(d) of the NPPF, it is not necessary to weigh the benefits of the scheme, as required by criterion (ii) of paragraph 11(d) of the NPPF. However, such a balance is undertaken below for three reasons; firstly, to cover the NPPF paragraph 215/216 consideration of heritage harm and benefits, secondly, to address the 'vsc' Green Belt considerations, and thirdly, in case the Inspector disagrees with the above, and believes that criterion (ii) of paragraph 11(d) does need to be assessed.

The list of benefits set out in the table below have been taken from the Appellants Statement, and for reasons set out, are not considered to be justified as such in a number of instances.

Table 1 – Benefits

Benefits	Comment	Weight
Provision of housing in a Council with less than 5 years HLS (Appellant's vsc)	Only 13 units.	Significant
Provision of C2 units (Appellant's vsc)	Same as above – double counting. It's not an additional benefit because only one form of housing is being provided – C2. Refer to other objections questioning the need/demand for such units based upon current provision/capacity.	n/a
Health and Welfare benefits of the scheme for future residents (Appellant's vsc)	Strongly questioned. A number of existing Thamesfield residents will be left with worse living	n/a

	conditions, as will the Remenham Row properties.	
Downsizing will free up family housing (Appellant's vsc)	Very questionable. It is only 13 units, and some future residents will currently live in smaller flats, other care homes or with relatives.	Very Limited
Makes effective use of brownfield land (para 124 of NPPF) (Appellants vsc)	Might be the case if it was a well-designed scheme. It's not. Para 124 also requires the environment and living conditions to be safeguarded and improved – exactly what the appeal scheme fails to do.	n/a
Ensures the retention of Thamesfield with improved financial viability.	The Viability Assessment is dated Dec 2024, so doesn't allow for the proposed scheme, or any change in market conditions since then. There is no evidence within it that Thamesfield cannot continue if the extension is not introduced. Even if such additional units are required, they can be delivered in an alternative form on this large site. The improved financial viability/return of the Appellants should not justify poor development.	n/a
Economic benefit through construction and future spend of staff/residents	Some benefit acknowledged during construction. Future resident spend likely to be v limited.	Limited
Enhanced and new green infrastructure	Given the large site area, a comparatively small amount of landscape/infrastructure works are proposed and will only be available to private residents.	n/a
Robust landscaping and planting	Repeats the above. Poor layout means there is no opportunity to introduce planting to where it is most needed.	n/a
10% BNG (Appellant's vsc)	As is currently required by all developments of this	Very Limited

	scale. The scale of the site allows for a much greater BNG to be achieved – Appellants have chosen the minimal amount possible. Given the upcoming changes to BNG regulations it might not happen at all.	
--	---	--

Table 2: Adverse Impacts

Adverse Impact / Harm	Comment	Weight
Heritage harm	To the two Conservation Areas and other heritage assets, as explained in detail in the Heritage Officer's Consultation response.	Significant
Neighbours Harm	To existing Remenham Row and Thamesfield residents – see associated objection letters.	Significant
Green Belt Openness	The replacement of single storey with three storey development, which will be apparent and obvious from the wider area including well used public footpaths.	Moderate

It is considered relevant to note that paragraph 11(d) (ii) of the NPPF specifically encourages consideration of securing well-designed places and providing affordable homes, when undertaking the tilted balance. For reasons set out in this and other objections the appeal scheme is quite clearly not a well-designed place due to the harm that will be caused, and it will provide zero affordable housing.

In conclusion, for the reasons set out above, there are not sufficient public benefits of the scheme to justify the heritage harm (re paragraphs 125 and 126 of the NPPF). The above tables show that the 'very special circumstances' put forward by the Appellant do not clearly outweigh the harm to the Green Belt by reason of inappropriateness and the other harm resulting from the proposal, as required by paragraph 153 of the NPPF. And with regards the tilted balance, if the Inspector considers it necessary to assess criterion (ii) of paragraph 11(d), the above tables explain why the adverse impacts significantly and demonstrably outweigh the benefits.

For the reasons set out above, and in earlier objections, it is therefore strongly considered that the appeal proposal fails to adhere with relevant development plan policy. It should therefore be dismissed unless material considerations indicate otherwise. In this instance, material considerations, most notably in the form of the

Council's Design Guide, and the NPPF, have set out further reasons why the appeal should be dismissed.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Meader'.

Andy Meader BSc Hons Dip TP MRTPI

Director

andy.meader@am2planning.co.uk