



Head of Development Control  
Wokingham Borough Council

11<sup>th</sup> February 2025

(by email only)

Dear Sir/Madam,

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

Following the submission of the above planning application which proposes the redevelopment of the existing Retirement Home at Thamesfield, I write on behalf of Remenham Parish Council in order to object to the proposed development. For reasons explained below, it is strongly considered that the application should be refused due to its conflict with Development Plan policy and material considerations also indicating the inappropriateness of the scheme.

The fundamental concern raised is that the scheme is poorly designed. It has not given due consideration to the constraints and context of the site and surroundings. In particular, it will have a significant adverse impact upon the amenities of neighbouring properties, it will detract from the character of the environment, and openness of the Green Belt and will deliver insufficient parking provision. Taking these points in turn.....

Impact on Neighbouring Properties

Detailed submissions (dated 30.01.25) have already been made on behalf of the residents at Remenham Row, who directly adjoin the site to the northwest. It is not considered necessary to repeat the objections made on their behalf, but the Parish Council fully endorses the points made, and the earlier submission is included in full at Appendix 1 for reference.

In summary, the scale, orientation, elevational openings and location of the proposed accommodation will have a substantial adverse impact upon the outlook and privacy levels of the neighbouring residents at Remenham Row. As a result, the proposed scheme is in direct conflict with Policy CP3 of the Council's Core Strategy, which advises that developments will be supported if they do not have a detrimental impact on the amenities of the adjoining land users. There is no doubt that the proposal will have a significantly detrimental impact on the adjoining land users in this instance, and there is clear and direct conflict with Policy CP3 as a result.

In addition, the proposed development fails (by a significant margin) to adhere to the separation distances set out within the Council's Design Guide, providing a further material consideration to demonstrate that the scheme is unacceptable as proposed.

### Impact on the Environment and Openness of the Green Belt

The application site lies in the designated countryside, outside of any settlement boundary. As a result, Policy CP11 of the Core Strategy is applicable and constrains development in such locations in order to protect the identity of settlements and maintain the quality of the environment. The Policy sets out a number of criteria that development proposals need to adhere to if they are to be considered appropriate in such locations, including;

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

In this case the site has previously been subject to a number of extensions and redevelopments over the years and the planning history is helpful in identifying what works have been undertaken. This in turn helps us to understand the size of the 'original' buildings that Policy CP11 relates to.

Applications 16698 and 16769 from 1981/1982 related to the proposed redevelopment of Thamesfield and referred to existing buildings on site with a GIA of circa 715 sqm at the time. It is recognised that, at the time, the Thamesfield site area was different to that of the current application area. The current application area includes some land and buildings that formed part of the previous nursery estate to the west, so were not within the Thamesfield site in 1981/82. Precise building comparisons across the entirety of the site are therefore not straight forward. However, the 715 sqm GIA of 1981/82 is a useful indication of the original building at Thamesfield, as understood to be indicated on the historic 1968 OS Plan at Fig 13 of the Applicant's Archaeology Statement by RPS.

The existing building at Thamesfield occupies a GIA of 3,492 sqm (as referred to at 6.7 of the Applicant's DAS). This represents a 488% increase beyond the GIA recorded for Thamesfield in 1981/82. The proposed scheme would result in a GIA of 4,722 sqm. This equates to a 35% increase beyond the existing GIA. It represents an increase of 660% beyond the 715 sqm figure from 1981/82.

Debate will often occur when a scheme results in a building that is increased by anything above 30% beyond the original, as to whether such a scale of increase should be classed as excessive. The proposed increase in this case will result in a building that has a GIA which is more than 6 times greater than that in place at Thamesfield in 1981/82. It is completely disproportionate to the original building on site and results in a far greater level of encroachment/expansion of development across the site than is currently experienced, let alone that which was originally in place. This is very evident when the proposed plans are compared to the historic OS Plans included within the Applicant's Archaeology Statement.

It is noted that there will be demolition as part of the proposed scheme, and hence the net footprint increase will not be of the same level as the floorspace increases. But the floorspace increases are achieved primarily through an increase in the scale of development from the replacement of existing single storey buildings adjacent to the boundary with Remenham Row, with three storey development in its place. This is an excessive expansion of the existing development, let alone that of the original buildings that the policy refers to.

The Applicant's own Planning Statement, at 6.3.5, acknowledges that the proposed development does not fall within any of the categories of development listed at Policy CP11 that are considered to be appropriate in the countryside. However, the Statement

then suggests that this should not be of concern because the proposal aligns with the principles of the policy. Such a position is strongly contended. One of the underlying aims of the policy is to maintain the quality of the environment outside of settlements, and this is enabled by the principle of controlling development in a number of ways, one of which is how the new development compares to that originally on site. There can be no doubt that the proposed scheme will result in a development that bears little resemblance to that of the original buildings on site. It will cause excessive encroachment of the site and expansion of development beyond the original buildings, and as a result is in clear conflict with both the detailed requirement and underlying purpose of Policy CP11.

The NPPF sets out a very similar approach to Policy CP11 towards the constraint of the extension of buildings in the Green Belt. As recognised at many points within the Applicant's submission, the proposed scheme will result in the 'extension' of the main building at Thamesfield. Paragraph 154 of the NPPF sets out a number of exceptions for which development in the Green Belt will not be inappropriate. This includes the following when considering developments which propose an extension;

*c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building.*

As explained above, the increase beyond the existing building is 35%, which is typically on the border line of being classed as disproportionate. However, the addition beyond the size of the original building is substantial. It will result in a building with over 6 times the GIA that was in place in 1981/82. It will quite clearly be a disproportionate addition over the size of the original.

The Applicant's Planning Statement suggests that the proposed scheme should be considered as a 'redevelopment', rather than as an extension, and hence makes reference to a different exception at paragraph 154 of the NPPF. The Parish Council disagree. The proposed works will quite clearly extend the existing main building at Thamesfield. The DAS refers to the works being an extension, and the Applicant's own application description is 'Part demolition of existing building and replacement *with a three-storey extension* to provide extra-care units (Use Class C2).....'. (my underlining)

The proposal should quite clearly be assessed against the requirements of criterion (c) of paragraph 154 of the NPPF and it quite clearly fails to meet such requirements.

With regard to the scheme's impact upon the Green Belt, the NPPF at paragraph 142 advises that the essential characteristics of Green Belts are their openness and their permanence. For reasons explained above, the openness of this part of the Green Belt will be harmed by the siting, height and scale of the proposed extension.

With regards the impact of the scheme upon the wider environment, the chosen materials for the extension, combined with its significant 3 storey scale, will mean that it is very apparent in views beyond the site. A decision has been made by the Applicant for the design to be striking and in contrast with the white rendered finish of the main building. Its very modern appearance will highlight its addition to the main building when viewed from a number of public views in addition to the substantial impact upon outlooks from the neighbours at Remenham Row.

One of the most relevant angles from which the extension will be very apparent is from the opposite side of the river, within Henley on Thames. This is relevant for two primary reasons: Firstly, the view is from a very well used riverside public right of way, offering

many residents and visitors to the town views across the river, towards the countryside and Green Belt beyond. Thamesfield falls within this view and the proposed extension will be readily apparent from it. Secondly, such views are obtained from within a Conservation Area. As a result, the harm caused by the extension to the character and openness of the site, is of even greater concern due to the resulting harm caused to the character and enjoyment of the adjacent Conservation Area.

It follows that the proposal is in conflict with Core Strategy Policy CP3 (a), which requires proposals to be of an appropriate scale of massing, height, materials and character to the area amongst other things. It is also in conflict with Policy CP3 (c) which requires proposals to have no detrimental impact upon important heritage features, the adjacent Conservation Area being one of these. The Council's Managing Development Delivery Document refers to Heritage Assets in greater detail at Policy TB24, requiring that they are conserved or enhanced by proposed works. Due to the detrimental impact of the proposed extension upon the Conservation Area, the proposal will also be in conflict with Policy TB24.

Given the close proximity of Thamesfield to the Conservation Area within Henley on Thames, the site makes a strong contribution to Green Belt purpose (d) as set out in the NPPF, which is '*to preserve the setting and special character of historic towns*'. It follows that the site cannot be classed as 'Grey Belt' land as defined within the NPPF.

#### Parking Provision

The Council's Parking Standards recommend that for Residential Care Homes 1 space should be provided per full-time staff member plus 1 visitor space per 3 residents. The Application Form advises that there will be the equivalent of 13 full-time staff if the proposal is built (compared to 8 at present). As a result, there will be a net increase of 12 additional residential units on site and 5 additional full time staff. Applying the Council's standards for Care Homes this would require an additional 9 car parking spaces. Only 8 additional spaces are proposed, hence there is conflict with the standards.

However, the standards also comment that if independent units form part of the Care Home, then the above standards might not be appropriate. This is understandable due to the use of cars by those living in independent units likely to be higher than those who are in dependent units. It follows that the deficit in provision is even more of a concern given that there are independent units proposed in this case.

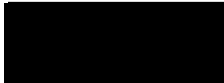
The Applicant's Transport Statement suggests that the proposed parking provision will be appropriate based upon a survey of parking availability that was undertaken on a single Thursday and Friday in February. It is suggested that such a short period for a survey will not give a true reflection of the true parking requirements for the site.

The provision of sufficient parking is of particular importance in this location. If parking is unavailable on site, this is no alternative authorized parking provision nearby. Any shortage of provision on site is likely to encourage unauthorized parking on Wargrave Road, with subsequent highway danger caused.

The proposal is therefore considered to be in conflict with Policy CC07 of the MDD relating to parking.

This submission has explained why the poorly designed proposal has given insufficient consideration to the impact it will have upon the site and its surroundings. It follows that the proposal is in clear conflict with relevant development plan policies and should be refused by the Council unless material considerations indicate otherwise. It is noted that the Applicant suggests that weight should be given to material considerations, including the demand for such accommodation. Others will be able to advise upon whether such demand really exists, but even if it does, there is still no justification to approve a scheme that will have such a detrimental impact upon the amenities of neighbours and appearance and character of the site in the wider environment. The recent NPPF provides further justification as to why the proposal is unacceptable and should be refused.

Yours sincerely,



**Andy Meader BSc Hons Dip TP MRTPI**

Director

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Head of Development Control  
Wokingham Borough Council

30th January 2025

(by email only)

Dear Sir/Madam,

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

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

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

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

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

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

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



**Photo 1**

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

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

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

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

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

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

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

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



**Photo 2**

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

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

*'Planning permission will be granted for proposals that:*

- a) Are of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life*

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

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

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

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



Yellow Brick - Non verified view

### **Extract from DAS page 28**

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

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

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

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

Yours sincerely,



**Andy Meader BSc Hons Dip TP MRTPI**

Director

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