
**REBUTTAL PROOF OF EVIDENCE:
PLANNING MATTERS**

**Prepared by Mrs Brigid Taylor MSc LLB
MRTPI PISEP MIEEnvS**

**LAND NORTH OF READING ROAD,
ARBORFIELD**

**Appeal against the decision of Wokingham
Borough Council to refuse outline planning
permission for up to 111no. dwellings with
associated works, parking, landscaping,
publicly accessible open space, with access
from Reading Road (All matters reserved save
for means of access).**

Prepared by: Woolf Bond Planning Ltd

On behalf of:

Dandara Southern Ltd and Elstree Land Ltd

PINS Ref: APP/X0360/W/25/3371069

LPA Ref: 243099

WBP Ref: 9015

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1. This Planning Rebuttal Proof of Evidence has been prepared by me, Brigid Taylor, in response to the Planning Proof of Evidence prepared by Joanna Carter of Wokingham Borough Council. My qualifications and experience are outlined in my original Proof of Evidence. I confirm that this statement and my evidence is true and reflects my professional opinion.
2. This rebuttal relates, in particular, to statements in Joanna Carter's Proof of evidence regarding the need for a Sequential Test in light of the updated flood risk information following the Environment Agency's revision to the Flood Map for Planning on 25th March 2025 (page 15 of her proof).
3. At paragraph 4.7 of her Proof Ms Carter notes that the "The appeal is in outline, with no fixed layout and no fixed development parameters, except for the access. The Illustrative Masterplan and Indicative Land Use Parameter Plan are, therefore, non-determinative." On that basis, and as explained at paragraph 4.12 of her proof, she states that given that the application does not fix the developable area, the decision-maker must assess the reasonable worst-case flood-risk scenario, such as the access route being located in Flood Zone 2 and 3.
4. Notably, the vehicular accesses into the Site have been fixed and do not pass through Zone 2 or 3, so it is assumed that she is concerned with the internal access route within the Site rather than the point of access into/out of the Site. Notably, the only areas of Zone 2/3 are around the Main River which bisects the Site and the western landscaped boundary. It is clear from the indicative Land Use Plan and Masterplan that it is not proposed to take the access road across the Main River (given the need to maintain an 8m maintenance strip around the same) or indeed through the landscaping belt on the western boundary. No vehicular access has been proposed on that boundary.
5. The Indicative Land Use Parameter Plan does not show any built development in Flood Zone 2 or 3. The Appellant is content to agree that the Indicative Land Use Parameter Plan be bound in by condition so as to avoid built development in Flood Zones 2 or 3. Accordingly, this could become a fixed rather than indicative parameter plan so as to provide further comfort that no built development would come forward in Zones 2 or 3.
6. Additionally, an amended masterplan (appended to the Appellant's Highways Rebuttal and submitted with these rebuttals) shows the pedestrian link onto Church Lane connecting onto that road at a point further north so as to avoid passing through Flood Zone 2 or 3. The Arboriculture Rebuttal confirms this is acceptable in terms of arboriculture impacts.
7. The Site is identified in the Council's SFRA as being at low risk of groundwater flooding (as per paragraph 2.2.1 of Appellant's Flood Risk and Drainage Rebuttal). The Council's Sequential Test for the emerging Local Plan Update also regards sites as having low groundwater flood risk where a site has less than 10% of its area at a level of between 0 and 0.025m below

ground or with less than 75% of their area at a level of between 0.025m and 0.5m below ground have been considered low risk. At paragraph 2.2.4 of the Flood Risk Rebuttal the witness confirms this Site falls below this threshold.

8. Accordingly this overcomes Ms Carter's point regarding the need for a Sequential Test.
9. Regarding the issue of veteran trees and impacts thereupon, the fixing of the Land Use Parameter Plan (by condition, to secure compliance at Reserved Matters stage) would ensure no built development or domestic curtilages come forward within the Root Protection Areas of the veteran trees which are the subject of discussion between the agriculture witnesses. Indeed the Council would have full control over the layout at Reserved Matters stage. The Appellant is also content to agree a condition which secures the submission and approval of a landscape management plan which ensures suitable management of public open space areas within the RPAs of veteran trees (for example, to limit access thereto by fencing or landscaping) and to do so would not prejudice the ability of the scheme to deliver the necessary public open space requirements.