

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Fwd: West Berks PVFF Representation  
**Date:** 31 January 2025 21:21:23  
**Attachments:** [REDACTED]

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**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

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Please see attached representations on the Local Plan Review



xmas card list  
2024.docx

**West Berkshire Local Plan Review 2022-2039 (LPR)  
Consultation on Proposed Main Modifications  
(6 December 2024 – 31 January 2025)**

Representation Form

**Ref:**  
(For official use only)

<b>Please complete and return this form:</b>	<b>By email:</b> [REDACTED]
	<b>By post:</b> Planning Policy, Development and Housing, Council Offices, Market Street, Newbury, RG14 5LD
<b>Return by:</b>	<b>11:59pm on Friday 31 January 2025</b>

Please read the **Guidance Note**, available on the Council's website <https://www.westberks.gov.uk/lpr-proposed-main-modifications>, before making your representations.

This form has two parts:  
PART A – Your details  
PART B – Your representation(s)

Please complete a new form for each representation you wish to make.

<b><u>PART A: Your details</u></b>		
<i>Please note the following:</i>		
<ul style="list-style-type: none"> <li><i>We cannot register your representation without your details.</i></li> <li><i>Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.</i></li> </ul>		
	1. Your details	2. Agent's details (if applicable)
Title	Mr	
First Name*	Benjamin	
Last Name*	Mitchell	
Job title <i>(where relevant)</i>	Trustee, Flood Risk Specialist	
Organisation <i>(where relevant)</i>	Pang Valley Flood Forum	
Address*. <i>Please include postcode</i>	[REDACTED]	
Email address*	[REDACTED]	
Telephone number	[REDACTED]	
Consultee ID <i>(if known)</i>		

\*Mandatory Field

**PART B – Your representation(s)**

All comments made at previous stages of the LPR have been taken into account by the Inspector and there is no need to resubmit these. Publication of the proposed Main Modifications is a regulatory stage and any representations made should relate specifically to the legal compliance and soundness of the proposed Main Modifications and should not relate to parts of the Plan that are not proposed to be modified.

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.*

Your name or organisation (and client if you are an agent):	Pang Valley Flood Forum
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**Proposed Main Modifications and Proposed Changes to the Policies Map**

1. Please indicate whether your representation relates to the Schedule of Proposed Main Modifications or the Schedule of Proposed Changes to the Policies Map and provide the modification/change number you are commenting on below:

Document name	Schedule of Proposed Main Modifications
Modification/Change reference number (MM / PMC)	MM10

2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:  
(please tick/mark 'X' one answer for a and one for b)

- a) Legally compliant                      Yes                       No
- b) Sound    Yes                       No

*Please refer to the guidance notes for a full explanation of 'legally compliant' and 'soundness'*

If you consider the Proposed Main Modification or Proposed Policy Map Change not to be sound, please identify which test of soundness your representation relates to:  
(please tick/mark 'X' all that apply)

<b>Positively Prepared:</b> The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.	<b>x</b>
<b>Justified:</b> the LPR should be the most appropriate strategy, when considered against the reasonable alternatives	
<b>Effective:</b> the LPR should be deliverable	<b>x</b>
<b>Consistent with national policy:</b> the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF	<b>x</b>

**3. If you have answered 'No' to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.**

*You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

<b>SEE ATTACHED LETTER</b>
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**Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)**

**4. Do you have any comments on the updated Sustainability Appraisal/Strategic Environmental Assessment Report – Proposed Main Modifications (November 2024)?**  
*(Please be as precise as possible)*

Page number	
Paragraph number	
Comments:	

**Habitats Regulations Assessment**

**5. Do you have any comments on the addendum to the Habitats Regulations Assessment of the Proposed Main Modifications (November 2024)?**

*(Please be as precise as possible)*

Page number	
Paragraph number	
Comments:	

**Notification of Progress of the Local Plan Review**

**6. Do you wish to be notified of any of the following?**

*(please tick/mark 'X' all that apply)*

<i>The publication of the report of the Inspector appointed to carry out the examination</i>	
<i>The adoption of the Local Plan Review</i>	

Please ensure that we have either an up-to-date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy Team.

Signature		Date	31 Jan 2025
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**Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.**



# Pang Valley Flood Forum

Working collaboratively to reduce flood risk throughout the communities in the Pang Valley

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**31/01/2025**

West Berkshire Council  
Planning Policy  
Development and Housing  
Council Offices  
Market Street  
Newbury RG14 5LD

Dear Local Plan Review,

I understand from SP5/MM10 it is required that the developer will produce a surface water drainage strategy to deal with runoff from the site which will not exacerbate existing flood risk in Thatcham. In principle this is fairly standard stuff except that the only way that the strategy can truly be compliant is by creating a separate drainage route through to the Kennet...for which there is currently no provision I assume.

On site SuDS will maximise on reducing peak discharge to the existing 'green field' rate of discharge through storage systems with hopefully soakage facilities where possible. However, this does not address the increased volume of run off which will be stored and released after the storm. Recent experience shows us that storms can come in fairly quick succession, as has been the case over the past couple of weeks with Storms Darragh, Eowyn and Herminia. If the flood storage facilities are already full from the previous storm then flooding will result in Thatcham.

The recently constructed flood storage facilities along the foot of the hills to the north of Thatcham are designed to protect against a repeat of the 2007 event, if the green field slopes above these facilities are developed then there will no longer be any natural soakage into the underlying geology. This soakage ability cannot be replicated in small areas of concentrated soakage...hence the increase in volume of runoff. The available capacity in the surface water sewer and culverted watercourse system through Thatcham and on to the River Kennet is used up by the recently completed Surface Water Management Plan...the increased volume of runoff from proposed new development cannot be taken into this system without increasing flood risk in Thatcham. The proposed development is therefore not deliverable



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unless a new route is found to take surface water away to the River Kennet. If a proposed development is undeliverable within the required performance criteria then it cannot be approved.

If the development is approved then, without a new drainage route to the River Kennet, the surface water drainage strategy will ultimately be a fudge necessitated by the need to deliver the scheme and this certainly will not be sustainable.

As the requirement for a surface water drainage strategy is included within the LPR aspects currently under consideration then a submission pointing out the above position would be allowable and valid.

I have a forty year career in flooding and surface water drainage during which time my expert evidence has prevailed at fifteen public inquiries. I have often appeared on national television news programmes to give my expert opinion and represented the British Property Federation on the UK Government's Policy Advisory Board for the SuDS standards following the Flood and Water Management Act 2010.

Benjamin Mitchell [REDACTED]