

Jessica Duffield  
Barnsley Metropolitan Borough Council  
Development Control

**Our ref:** RA/2024/147502/05-L01  
**Your ref:** 2024/0580

**Date:** 28 November 2025

By email:

[DevelopmentManagement@barnsley.gov.uk](mailto:DevelopmentManagement@barnsley.gov.uk)

Dear Jessica

**HYBRID PLANNING APPLICATION COMPRISING A) FULL PLANNING APPLICATION FOR 250NO DWELLINGS INCLUDING 2, 2.5, AND 3 STOREY HOUSES TOGETHER WITH ATTENUATION BASIN AND TEMPORARY ACCESS ROUTE, LANDSCAPING AND ASSOCIATED WORKS AT AREA 1 AND B) OUTLINE PLANNING APPLICATION WITH ALL MATTERS RESERVED FOR UP TO 200NO. DWELLINGS ON AREA 2 (AMENDED RED LINE BOUNDARY, DESCRIPTION AND PLANS). LAND SOUTH OF DONCASTER ROAD AND ADJACENT TO STRAWBRIDGES GARDEN CENTRE, DARFIELD, BARNSELY, S72 5EZ**

Thank you for re-consulting us on this application following submission of a letter from the applicant in response to EA comments (their ref: E18/7309/MD/04A dated 30 October 2025) which we received on 10 November 2025.

Based on the letter, we are not able to remove our previous objection for the reasons outlined below.

Our previous comments and reasons for objection are from the specific perspective of fluvial (river source) flooding and not surface water flooding. We are not the competent authority on surface water flood risk issues. This is managed by the Lead Local Flood Authority.

When we referred to the FRA not accounting for climate change, it was specifically for fluvial flooding. Because the site boundary is partly within Flood Zone 3, the FRA must demonstrate that the proposed development doesn't increase fluvial flood risk up to and including the design event (the 1% Annual Exceedance Probability event, taking the impacts of climate change into account).

To do this, the FRA will need to demonstrate an understanding of the baseline design flood (both level and extent) and show that the proposed development won't be at risk from the design flood or impact it, so that flooding is directed offsite, increase risk to others.

With regard to our comments on the proposed basin, our concerns aren't around the basin's capacity to contain surface water, but actually, that we don't consider that enough detail has been provided on the basin design, to understand whether it could impact fluvial flood risk, for instance by incorporating raised embankments or reprofiling within the fluvial design floodplain.

It should be noted that a surface water detention basin can't be considered as providing any storage volume for fluvial flooding as it has to be assumed that it is full, from surface water.

Regarding the rerouting of the watercourse, the FRA will need to demonstrate that the proposed rerouting will not increase fluvial flood risk in fluvial events up to and including the design event. The information provided appears to focus on surface water flooding and while the explanations of topography may also apply to fluvial flooding to some extent, we consider that it isn't enough alone to show a comprehensive understanding of fluvial risk (with climate change accounted for) and show what the implications of the rerouting will be. The FRA will need to be updated to show an understanding of fluvial flood risk and how it will be impacted by the rerouting of the watercourse. The FRA will need to demonstrate, with clear evidence, that in fluvial flood events up to and including the design event, the rerouting will not cause increased off site flood risk. This could be achieved by presenting the pre and post development design flood extents or potentially by providing further details of the surrounding topography. This would need to be detailed topographical information.

In light of the above, we are not able to remove our previous objection. Slightly revised objection wording (for clarity) is provided below:

### **Environment Agency position**

In the absence of an adequate flood risk assessment (FRA) we object to this application and recommend that planning permission is refused.

### **Reasons**

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere.

In particular, the FRA fails to:

- Consider how a range of fluvial flooding events (including extreme events up to and including 1% Annual Exceedance Probability plus Climate Change uplift will affect people and property. (There is no assessment of the impact of climate change using appropriate climate change allowances (Don and Rother Management Catchment peak river flow allowances for more vulnerable development in 2080s is 28%).)
- Consider how people will be kept safe from the identified flood hazards.
- Demonstrate that the proposed rerouting of the watercourse, does not increase offsite fluvial flood risk.
- Demonstrate that the proposed basin, does not increase offsite fluvial flood risk.

- Consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event.

### **Overcoming our objection**

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us if a revised FRA is submitted and we will respond within 21 days of re-consultation.

The applicant could redefine the site red line boundary, ensuring that the site is entirely within Flood Zone 1.

If the red line boundary remains as it is, then the applicant will have to:

Identify the 1% AEP plus CC fluvial design flood level and demonstrate that the proposed development doesn't increase flood risk. Measures should include:

- Finished floor levels no lower than 600mm above the designed flood level.
- Ensure the proposed development does not increase offsite flood risk by displacing flood water during fluvial flood events.
- Evidence the proposed watercourse rerouting and basin development do not increase offsite fluvial flood risk by displacing or re-routing flood water.
- Demonstrate that site users have a safe means of access and egress up to and including the fluvial design flood event.

If you need any clarification or further information, please contact us.

Yours sincerely

**Bev Lambert**  
**Sustainable Places - Planning Advisor**

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