# UPDATE TO FLOOD RISK ASSESSMENT

Site of West Green Recycling, West Green Way, Monk Bretton, Barnsley, S71 5SN

On behalf of Eric Lidster (West Green Recycling Ltd)

Proposal:

*Erection of store, erection of enclosure for external pipework, erection of aggregate wash plant and associated infrastructure; and laying of concrete slab (retrospective), and the construction of boundary treatment (part retrospective) and siting of filter presses for use in association with the existing treatment and management of non-hazardous waste.*

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

**Document Control**

| Issue | Date | Author | Comment |
|---|---|---|---|
| **DV** | | **STC** |  |
| **SV** | **10 December 2025** | **STC** |  |

**CONTENTS**

# 1 INTRODUCTION

1.1.1 In accordance with the Site-specific flood risk assessment: Checklist[1] a flood risk assessment must set out the following (which is addressed as set out below):

1. Describe the development site (the "site")
   *This is addressed in the original FRA and updated below.*
2. Provide a general summary of the development proposals (the "proposal")
   *This is addressed below as well as the FRA.*
3. Apply the sequential test if needed
   *This is updated below in line with recent PPG guidance below.*
4. Describe how flood risk at the site is likely to be affected by climate change is addressed
   *This is addressed in the original FRA and updated below.*
5. Describe the risk of flooding to and from the proposal
   *This is addressed in the original FRA and updated below.*
6. Include details of surface water management unless these are addressed separately in a drainage strategy
   *This is addressed in the submitted Drainage Plan / strategy.*
7. Provide a summary of the numbers of future occupants and users of the proposal
   *This is addressed below.*
8. If required apply the exception test
   *This is updated in line with recent PPG guidance below.*
9. Describe any residual risk; and
   *This is addressed in the original FRA and updated below.*
10. Provide the credentials of the author of the flood risk
    *This is addressed in the original FRA and below respectively.*

1.1.2 It has previously been agreed with the Local Authority and accepted at a recent appeal in respect of the site (ref: APP/R4408/W/25/3369666 dated 20 November 2025) by the Inspector that the original FRA, which was prepared to support the location of a previous Sub Station

[1] PPG, Paragraph: 80 Reference ID: 7-080-20220825, updated 17 September 2025

proposal in the position of the current Store as shown on the Site Layout Plan Reference: 100 Rev. C could be relied upon provided that the Planning Statement clarified the fact that the Store was being substituted for the Sub Station).

1.1.3 This update to the Flood Risk Assessment dated November 2022 (the "original FRA") has been prepared in the context of revised NPPF, paragraph 175, and the Environment Agency's (the "EA") updated flood risk map for planning in line with the relevant aspects of the checklist.

1.1.4 This update is to be read in conjunction with the original FRA such that it and the original FRA together with this FRA Update constitute an up to date Flood Risk Assessment for the proposal.

## 2 SITE

2.1.1 The application site is shown on the Location Plan and Site Layout Plan (Rev C) submitted with the planning application and relevant aspects are described in the original FRA and other parts of this FRA Update.

## 3 DEVELOPMENT PROPOSALS

3.1.1 The proposal is for the following development:

*Erection of store, erection of enclosure for external pipework, erection of aggregate wash plant and associated infrastructure; and laying of concrete slab (retrospective), and the construction of boundary treatment (part retrospective) and siting of filter presses for use in association with the existing treatment and management of non-hazardous waste.*

3.1.2 The proposal is shown on the Site Layout Plan (Rev. C) submitted with the planning application[2].

[2] Copy attached at Appendix C together with photographs of the site

3.1.3 The current number of occupants and users of the development permanently at the site are approximately 8 staff associated to the development. This is not anticipated to change in the future.

# 4 THE PROPOSAL IN THE CONTEXT OF UPDATED FLOOD RISK DATA

*4.1.1* The data for Flood Maps for Planning (FMiP) was updated in March 2025. The updates have resulted in marginal increases in Flood Zone 3, including the climate change uplift scenarios, within the site.

4.1.2 By overlaying the Proposed Site Plan onto the latest flood mapping data[3], and with reference to the proposal the following can be said:

- The currently located Substation is located within FRZ 1
- the Filter Press is partially located with FRZ 2/Flood Zone plus Climate Change
- the proposed Store is located within FRZ 2; and
- the Storage Tanks (with one exception) are located within FRZ 1

4.1.3 With reference to the aggregate washing system and drawing number B02_C10088_00_01, only those components numbered 7 (conveyor belt), 8 (conveyor belt), 16 (conveyor belt) and 17 (conveyor belt) are located within the area of FRZ 2/Flood Zone plus Climate Change. The components so identified project from the main body of the Wash Plant and are elevated above the ground level. They are not designed to be 'accessed' in the manner of a building.

4.1.4 Regardless, as evidenced within the Topographical Survey:

[3] Local Authority's Appendix 6bi combined with drawing reference: Amended Proposed Site Plan – Rev D – October 2024 attached at **Appendix B**.

- Levels within the area of the Store (misidentified within the Topographical Survey and referred to as the Sub Station) are set between 42.090m AOD and 42.105m AOD, and the Store itself has a finished floor level of 42.259m AOD;
- Levels within the area of the aggregate washing system range from between 42.053m AOD and 42.132m AOD
- Levels within the area of the Filter Press range from between 42.061m AOD and 42.117m AOD
- Levels within the area of the Storage Tanks range from between 42.067m AOD to 42.103m AOD

4.1.5 Within the remainder of the site levels are set consistently at or above 42.00m AOD[4]. Levels rise along the line of the access road from 43.00m+ AOD to a high point of 47.445m AOD before falling to 42.705m AOD in the vicinity of the junction of the wider site with West Green Way.

4.1.6 The Applicant would stress that the levels recorded on the topographical survey are the most accurate. Those levels recorded/held by the EA to inform the extent of flood risk zones in so far as they relate to the site do not currently account for the data recorded as part of the topographical survey.

4.1.7 Thus, all levels within the site are above 41.6 AOD, which is sufficiently conservative for the purposes of ensuring that the proposal is suitable for the lifetime of the development.

# 5 NEED FOR SEQUENTIAL TEST

5.1.1 As per Paragraph 175 of the National Planning Policy Framework (the "NPPF"):

*The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land*

[4] Photographs showing the general layout within the site – indicating a 'level yard' **Appendix C**

*raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes and flood risk)*

According to the latest Planning Practice Guidance ("PPG")[5] published on 17 September 2025 in so far as it relates to Flood risk and coastal change:

*In applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping, without increasing flood risk elsewhere, then the sequential test need not be applied".*

5.1.2 In so far as the revised flood data affects the flood zone designation of the site and the proposal (which does not take into consideration the baseline datum levels contained within the topographical survey, and cannot therefore be a true reflection of the position as it is on the ground), it does so in relation to:

- the Filter Press as repositioned where part of the plant falls within FRZ 2
- the Store (where land on which the Store sits now falls into FRZ 2 rather than FRZ 3);
- in the area of the aggregate washing system where land beneath conveyor belts falls within the Flood Risk plus Climate Change Zone and FRZ2 levels; and
- in the area of one of the Storage Tanks where the position of the storage tank overlaps with land designated as FRZ2/Flood Risk plus Climate Change

5.1.3 However, as noted above, levels within the site sit at least a metre above 41.60m AOD, the minimum threshold required by the EA so as to enable it to extend its support, previously, for (essential infrastructure in the form of) the substation (application 2024/0329).

[5] PPG, Paragraph 027 Reference ID: 7-027-20220825, updated 17.09.2025

5.1.4 Given the design and layout of the proposal and the site, users would remain safe from current and future surface water flood risk for the lifetime of the development. The proportionate conclusion is that the sequential test need not be applied in this instance, a position that is supported by and in line with paragraph 175 of the NPPF

*5.1.5* As to whether the proposal would increase the risk of flooding elsewhere, the Local Authority's drainage engineer considers, based on the evidence and Drainage Plan submitted with the original planning application that *the existing site drainage and land drainage on site is acceptable as previously agreed, providing there are no changes to drainage plan and details.*

5.1.6 The Applicant confirms that the drainage plan and details remain unchanged.

*5.1.7* As per the most up to date PPG, there is no requirement to undertake a Sequential Test.

# 6 EXCEPTION TEST

6.1.1 According to the PPG[6]:

*The Exception Test requires two additional elements to be satisfied (as set out in Paragraph 154 of the National Planning Policy Framework) before allowing development to be allocated or permitted in situations where suitable sites at lower risk of flooding are not available following application of the sequential test.*

*It should be demonstrated that:*

- *development that has to be in a flood risk area will provide wider sustainability benefits to the community that outweigh flood risk; and*
- *the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and where possible, will reduce flood risk overall.*

[6] PPG, Paragraph: 031 Reference ID: 7-031-20220825

*The Exception Test is not a tool to justify development in flood risk areas when the Sequential Test has already shown that there are reasonably available, lower risk sites, appropriate for the proposed development.*

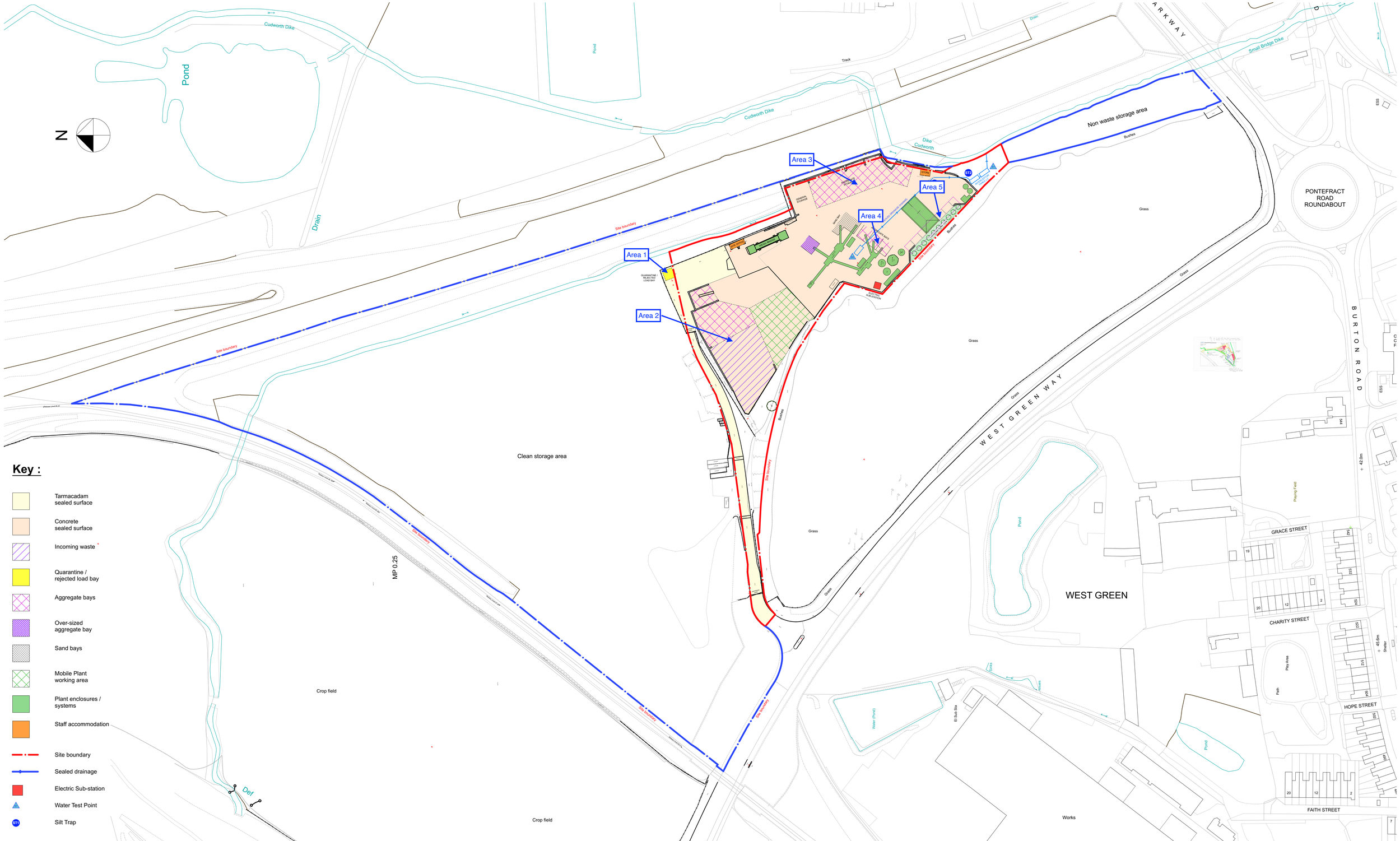
6.1.2 As there is no requirement to undertake the Sequential Test, the requirement to undertake the Exception Test does not apply.

# 7 CREDENTIALS

**7.1.1** The original FRA was produced by Roy Lobley Consulting. Rob Lobley is a highly respected, experienced engineer and manager, having worked for over 35 years in land drainage, flood defence and flood risk management for both the public and private sectors. He began his career with an Internal Drainage Board, before moving to the newly formed National Rivers Authority and then the Environment Agency. After working for various multidisciplinary consultancies, he founded Roy Lobley Consulting in 2016.

7.1.2 This FRA Update was produced by Susan Crowley, who is a Town Planner qualified to MRTPI standards with over 35 years' experience in the planning profession including; at a senior level, as a Major Projects Officer within Sheffield City Council; in higher education, at Sheffield Hallam University as Course Leader for the RTPI accredited MSc in Urban Planning; and working with consultancies in the private sector before founding her own planning consultancy.

## APPENDIX A - PHOTOGRAPHS OF SITE




## Key :

- Tarmacadam sealed surface
- Concrete sealed surface
- Incoming waste
- Quarantine / rejected load bay
- Aggregate bays
- Over-sized aggregate bay
- Sand bays
- Mobile Plant working area
- Plant enclosures / systems
- Staff accommodation
- Site boundary
- Sealed drainage
- Electric Sub-station
- Water Test Point
- ST1 Silt Trap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SLA Design Technical LLP
The Link Building
24A St Andrew's Road
Sheffield
South Yorkshire
S11 9AL

**www.SLAdesign.co.uk**
**E-mail:** enquiries@SLAdesign.co.uk
**Tel:** (+44) 0114 2585603 **Fax:** (+44) 0114 2362918

**SLA Design Technical LLP**
Reg. No. OC432637 Registered in England and Wales
Reg. Office: 39-43 Bridge Street, Swinton, Mexborough, South Yorkshire S64 8AP


Client:

E J LIDSTER LTD

Revision : Date :

Rev A - 25/11/25 - Press machinery building layout amended / rotated.
Rev B - 26/11/25 - Press machinery building layout amended / concrete wall relocated and landscape buffer zone added.
Rev C - 10/12/25 - Site boundary line amended, concrete wall and landscape buffer zone line amended.

Project Title:

West Green Recycling
West Green Way
BARNSLEY
S71 5SN

Drawing Title:

# Site Layout Plan

| Project No: | Drawing No: | Revision: |
|---|---|---|
| 25/038 | 100 | C |
| **Date:** | **Drawn by:** | **Scale:** |
| Oct 2025 | PH | 1:1000@A1 |

Drawing Status : REVISION


Main Yard looking East/Southeast

View Southeast past Wash Plant

Quarantine Bay Area 1

Aggregate Storage Area 2

**Photo 2 – Area 2**

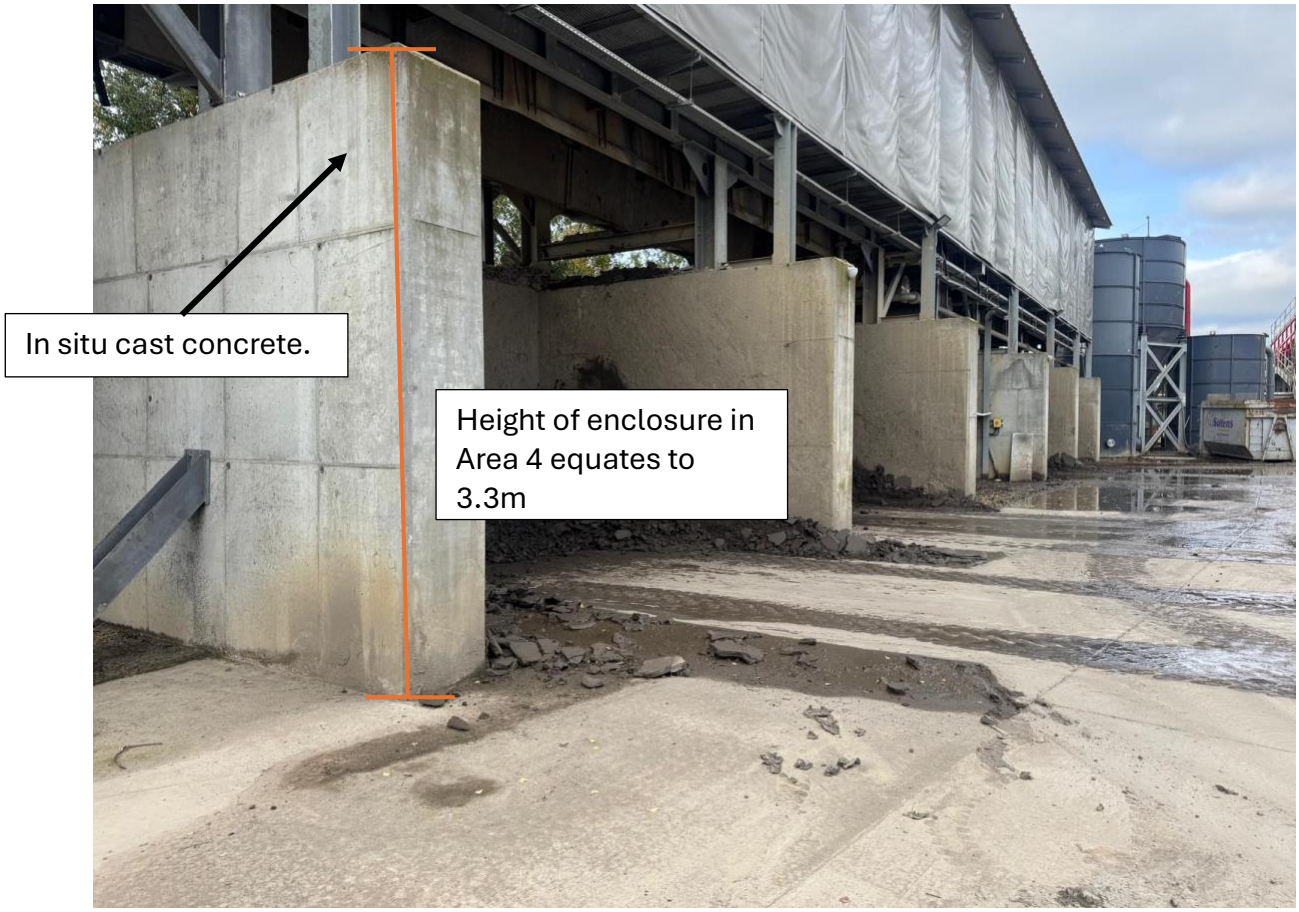
**Photo 3 – Area 3**

Main Yard looking East

Aggregate Storage Area 2 looking South into Main Yard

Filter Press looking Southwest

**Photo 6 – Area 5**



Looking Northeast towards Wash Plant

**Photo 4 – Area 4**