

Barnsley Metropolitan Borough Council
Development Control

Our ref: RA/2025/149119/01-L01
Your ref: 2025/1077

Date: 14 January 2026

Sent via email

Dear Planning Team

Change of use from dwellinghouse (class c3) to 4-bed 4-person HMO (class c4) (amended description).

329 Midland Road, Royston, Barnsley, S71 4AZ

Thank you for consulting us on the above.

Environment Agency position

We **object** for the reasons detailed below.

Flood Risk

We note the proposal is for a change of use that introduces ground floor sleeping. We note there is no change to the existing footprint of the building. However the site is within Flood Zone 3 and is classed as More Vulnerable.

We note on the application form, the question “Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)?” the applicant has answered “no”. A culverted ordinary watercourse runs beneath property.

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

Reasons:

The application site lies within Flood Zone 3, which is land defined by the planning practice guidance as having a high probability of flooding. The NPPF (paragraph 181, footnote 63) and the Flood Risk and Coastal Change Planning Practice Guidance (paragraphs 20 and 21) states that an FRA must be submitted when development is proposed in such locations.

An FRA is vital to making informed planning decisions. In its absence, the flood risks posed by the development are unknown. This is sufficient reason for refusing planning permission.

Overcoming our objection

To overcome our objection, the applicant should submit an FRA which demonstrates that the development is safe without increasing risk elsewhere. Where possible, it should reduce flood risk overall.

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

Guidance on how to prepare a flood risk assessment can be found at [Flood risk assessments: applying for planning permission - GOV.UK](#).

FRA sources of information - advice to applicant

We do not prepare or provide FRAs, however, relevant flood risk data can be ordered via our [Flood Map for Planning page](#) or our Customers and Engagement teams can provide any relevant flood risk information that we have available. Please email neyorkshire@environment-agency.gov.uk. Your LPA should have undertaken a Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform your FRA. Please contact your LPA to determine what information is available. Further advice on what to include in an FRA can be found in the planning practice guidance including a checklist: [Flood risk and coastal change - GOV.UK](#).

Flood resistance and resilience - advice to LPA/applicant

We strongly recommend the use of flood resistance and resilience measures. Physical barriers raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the [Flood Risk and Coastal Change pages](#) of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

- Government guidance on flood resilient construction [Flood resilient construction of new buildings - GOV.UK](#)
- CIRIA Code of Practice for property flood resilience [Code of practice for property flood resilience C790](#)
- British Standard 85500 – Flood resistant and resilient construction [BS 85500:2015 | 30 Nov 2015 | BSI Knowledge](#)

Note to LPA

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Should you have any queries regarding this response, please contact me.

Yours faithfully

Miss Jennifer Wilson
Planning Specialist

Direct e-mail sp-yorkshire@environment-agency.gov.uk