

Barnsley Metropolitan Borough Council
Planning and Building Control
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S70 9GG

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Proposal: Installation of a multifunctional Communication Hub including
defibrillator
Site: Pavement o/s 22 May Day Green, Barnsley S70 1SH

I write further to my recent applications and subsequent correspondence concerning the above proposal.

This Flood Risk Assessment (FRA) Statement has been prepared on behalf of Infocus Public Networks in support of the proposed installation of a multifunctional Communication Hub, including a defibrillator, located on the pavement outside 22 May Day Green, Barnsley S70 1SH, within Flood Risk Zone 2.

The purpose of this statement is to conduct a Sequential Test in accordance with national and local planning policy, to assess any potential flood risk associated with the proposed development, and to demonstrate that the design and siting of the unit will not give rise to an increased flood risk to the site or surrounding area.

The application site is located within Flood Risk Zone 2, defined as land having a medium probability of river or sea flooding, with an annual probability of between 0.1% and 1%. Land within Zone 2 is recognised as being subject to potential flooding during more extreme events, but generally benefits from a degree of protection afforded by existing flood defences.

The proposed development comprises the installation of a single free-standing Communication Hub unit. The unit has been carefully designed and positioned to ensure a minimal impact on the existing streetscape and surrounding infrastructure, both physically and visually.

The development is small-scale, non-habitable infrastructure located entirely within the existing adopted highway. It does not introduce a new building or a more vulnerable land use and its occupation is limited to the transient presence of pedestrians who may stand adjacent to the hub for short periods while using its facilities.

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National policy requires decision-makers to apply a sequential, risk-based approach to the location of development in areas at risk of flooding. However, the NPPF and the Planning Practice Guidance (PPG) explain that some minor development and changes of use are not required to be subject to the Sequential or Exception Tests, provided that flood risk is not increased elsewhere and the development can be made safe for its lifetime. In flood risk terms, the proposed Communication Hub is directly comparable to other forms of minor operational development and street furniture, such as telephone kiosks, bus shelters and cabinets, whose presence within the highway does not materially affect flood risk vulnerability.

Given its limited physical scale, non-habitable nature and the transitory presence of users, the proposal could reasonably be regarded as “minor development”. However, in the absence of a definitive policy basis to exclude it from flood risk controls, a Sequential Test has been undertaken and a proportionate, site-specific assessment of flood risk is provided to demonstrate that the development will be safe for its intended use and will not increase flood risk on or off the site.

Sequential Test

National planning policy requires that development is directed to areas of lowest flood risk, applying a Sequential Test to steer new development away from flood risk areas wherever possible. For the purposes of the Sequential Test, the proposed Communication Hub constitutes ‘water-compatible’ or at most ‘less vulnerable’ infrastructure, reflecting its limited footprint, non-habitable nature and absence of any requirement for occupation during flood events.

1. Identification of Need and Functional Requirements

The primary purpose of the proposed unit is to provide public communication, wayfinding and emergency defibrillator provision within Barnsley town centre. The Hub must, by necessity, be located in a highly accessible public realm location where pedestrian footfall is concentrated and where 24-hour access is available for emergency equipment.

In this context, any realistic alternative site must:

- Be located within the established town centre pedestrian network;
- Provide immediate, step-free access from the public highway; and
- Allow for safe servicing and maintenance without impeding highway safety or emergency access.

2. Consideration of Alternative Sites in Lower Flood Risk Zones

The Sequential Test requires consideration of reasonably available alternative sites within areas of lower flood risk (i.e. Flood Zone 1), taking into account both planning and operational constraints.

A review of the town centre public realm has been undertaken, considering:

- Existing pedestrianised streets, public squares and key movement corridors;
- Land on unregistered adopted highways where installation can reasonably be accommodated as statutory undertakers; and
- Locations that can host a free-standing unit without causing obstruction to footways, access to premises, or statutory undertakers' equipment.

This exercise identifies that the main town centre streets and public realm suitable for a unit of this type are predominantly within Flood Zone 2. In practice, there are very limited, if any, sequentially preferable locations within Flood Zone 1 that:

- Are of comparable accessibility and visibility for emergency equipment; and
- Can accommodate the required unit without conflicting with other critical infrastructure or causing highway or public safety concerns.

3. Justification for the Application Site

Within this constrained town centre context, the application site on May Day Green is considered an appropriate and justified location for the following reasons:

• Town Centre Function and Accessibility

The site sits on a key pedestrian thoroughfare within Barnsley town centre, offering high public footfall and 24-hour accessibility to the defibrillator and communication functions. This level of accessibility cannot be replicated in more peripheral or lower-risk locations without undermining the primary public benefit of the proposal.

• Operational and Technical Constraints

The unit requires connection to existing electrical and communication networks and sufficient pavement width to avoid obstruction. The May Day Green location accommodates these requirements while maintaining safe pedestrian movement and servicing arrangements. Alternative sites either lack the necessary utility connections, have insufficient width, or would conflict with existing street furniture or highway safety considerations.

- **Nature of Development and Flood Vulnerability**

The Hub is a free-standing, non-habitable structure with no requirement for occupation during flood events. Its vulnerability to flooding is therefore inherently low, and its design has been tailored to withstand and safely manage potential floodwater interaction. In this context, remaining within Flood Zone 2 is considered acceptable, provided that the development does not increase flood risk elsewhere and remains safe for its intended use.

On the basis of the above, it is concluded that there are no reasonably available alternative sites in areas of lower flood risk that could deliver the required town centre function, accessibility and technical connections. The Cheapside site therefore satisfies the Sequential Test as the most appropriate location, notwithstanding its Flood Zone 2 designation.

Assessment of Flood Risk: Pavement o/s 22 May Day Green, Barnsley S70 1SH

1. Design and Siting:

- The proposed unit is designed with resilience in mind and will be constructed using materials that are resistant to flood damage.
- The unit will be elevated on suitable supports where necessary to reduce any potential ground-level flooding interactions. As shown in *Appendix B – Hub Unit Detail*.
- The application site has been positioned in an area that does not obstruct or alter existing drainage pathways, ensuring the natural flow of water is maintained.

2. Impact on Flood Risk:

- The installation of the unit is not anticipated to exacerbate flood risk. Its design minimises obstruction of water flow, and its siting on reinforced supports prevents water displacement.
- There will be no substantial change in ground levels or increased impermeable surfaces that could affect local water drainage or increase flood risk.

3. Mitigation Measures:

- Regular inspections will be put in place to ensure there is no debris accumulation around the unit that could affect water drainage.
- Non-permanent anchoring allows for temporary removal during extreme weather events, if deemed necessary.

Each of the Hub units will be powered by an electrical supply from Western Power, the Distribution Network Operator (DNO) for this Region. The supply feeds into a fuse head position 300mm off the ground within the base of the unit, please see attached plan at **APPENDIX FRA1** that shows the fuse head location. The power connections are IP65 rated, which gives protection against water splashed or jets but not full immersion. Should that event occur then the RCB within the unit will trip and cut off the electrical supply.

A further protective measure is provided by the DNO in the event of the supply feed being fully immersed or compromised, by which the LST fuse will blow, resulting in a dead supply. The unit itself and internal connections are earthed to neutralize any residual current. The unit will therefore be completely safe and have no live connections in the case of the unit becoming fully immersed in water.

Conclusion

Having regard to the Sequential Test, the constrained town centre context and the compatible nature of the proposed development, the May Day Green site is considered an appropriate and justified location for the Communication Hub within Flood Zone 2. There are no reasonably available, sequentially preferable sites in areas of lower flood risk that could deliver the necessary town centre accessibility, utility connections and operational requirements.

Furthermore, taking into account the limited physical footprint of the unit, its resilient design and elevation, and the management and electrical safety measures set out above, the installation of the free-standing Communication Hub on May Day Green, Barnsley, will not adversely affect the existing flood risk profile of the site or surrounding properties. The proposal does not materially alter existing drainage arrangements or overland flow paths and does not compromise the function of existing flood defences.

Given the non-intrusive character of the development and the measures incorporated to ensure safety in flood conditions, no additional flood risk management measures are considered necessary.

I trust the above provides the detail and assurance required. However, should you require any further information or clarification, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Stephen Herraghty'. The signature is fluid and cursive, with the first name 'Stephen' being more legible than the last name 'Herraghty'.

Stephen Herraghty MRTPI
Senior Town Planner
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