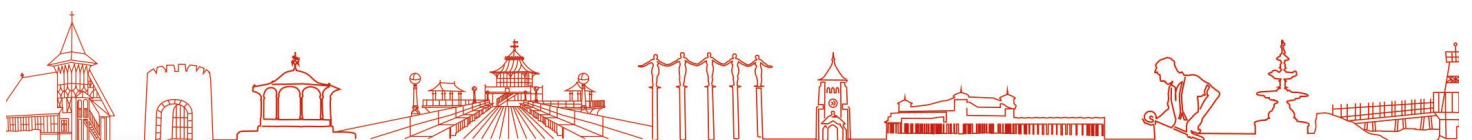




**North Somerset Local Plan 2039**

**Flood Risk Sequential  
Test of proposals within  
the Pre-submission  
Local Plan**

**November 2023**



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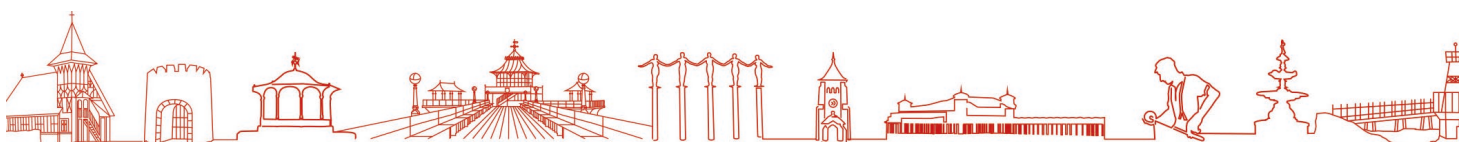
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# 1. Introduction

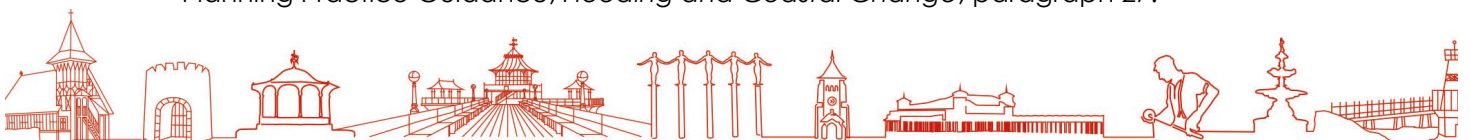
- 1.1 National Planning Policy Framework (NPPF: 2023) paragraph 159 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at higher risk – areas sequentially preferable in flood risk terms. Paragraph 161 and 162 of the NPPF require that allocations for development in areas of flood risk should apply the sequential approach to development to ensure that there are no suitable, ‘reasonably available’ alternative sites in a lower flood risk area. This is also referred to as the *sequential test* and if it is not implemented for sites at the plan making stage, national guidance<sup>1</sup> requires that it is implemented at the planning application stage.
- 1.2 The supporting Planning Practice Guidance (PPG) section on Flood Risk and Coastal Change provides guidance on the application of the sequential test, including regarding the definition of what might represent a ‘reasonably available’ alternative site (PPG, para. 28).
- 1.3 For residential proposals and other classes of development depending on their vulnerability, an Exceptions Test is also required in line with NPPF paragraph 164 to demonstrate wider sustainability benefits to the community that outweigh the flood risk, and that the development would be safe over its lifetime, including with reference to the future influence of climate change on flood risk. Only when both of these tests are satisfied, should development be directed to areas at higher risk.
- 1.4 This document provides a sequential assessment required to support the proposed allocation of land within a defined flood zone, within the Pre-submission Local Plan. This includes residential, regeneration sites within the main towns of Weston-super-Mare, Clevedon, and Portishead, and proposed business sites. Defined flood zones are those set out within the National Flood Map for Planning and the North Somerset Strategic Flood Risk Assessment (SFRA).

# 2. Methodology

- 2.1 Whilst residential and employment uses have different vulnerability to flooding as set out in Annex 3 to the NPPF – *Flood risk vulnerability*

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<sup>1</sup> Planning Practice Guidance, *Flooding and Coastal Change*, paragraph 27.



*classification*, the application of the sequential test applies to both with the same underlying objective. Broadly, the same key methodological steps apply as set out in the sections below.

## Identification of proposed development

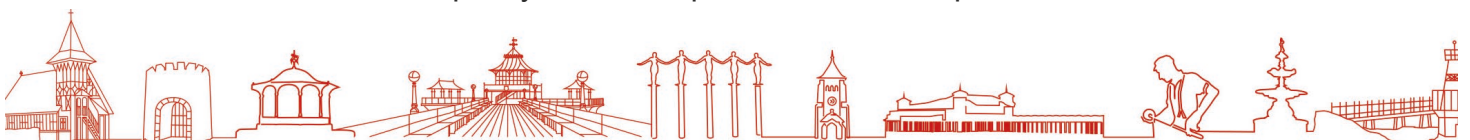
- 2.2 This section sets out the proposed development that requires the sequential test.

### Residential proposals

- 2.3 The Pre-submission Local Plan proposes 81 separate residential allocations as set out in Schedule 1, including a proposed Broad Location a Wyndham Way, Portishead. 45 of these already have planning permission and are counted within the committed supply. Of the 36 remaining, 20 of these are indicated to be either partly, or entirely affected by one or more sources of flood risk either currently or in future associated with sea level rise and associated tidal flood risk. In line with national guidance these should be subject to the sequential test if land at risk of flooding is proposed for development, unless the site's development is proposed to avoid that part at greater risk in future. At plan making stage, the specific details of development proposals such as the layout of development and access arrangements is not known. For allocated sites partly affected by a flood zone, and confirmed through a Flood Risk Assessment, it is assumed that development will avoid the area at risk. Otherwise a sequential test would be required t the planning application stage.
- 2.4 The remainder of this section is concerned with the 20 proposed sites within the Pre-submission Local Plan that are unconsented where part or all of the site is within a defined area at risk of flooding either now or in the future.

### Proposed residential sites with smaller parts coinciding with areas at risk of flooding

- 2.5 2 of the 20 proposed sites (see Table 1) have smaller parts within a designated flood zone. The flood risk part of the site is sufficiently small to be avoided through the development of the site and accordingly, the sequential approach to site/development layout should be pursued on these sites. This approach is not anticipated to impact upon the proposed development capacity of these sites as set out in Schedule 1 of the Local Plan as the capacity is based upon the net developable area outside the



flood risk part. This avoids the need for sequential assessment of these sites. In all cases, at the planning application stage, proposals should apply the sequential approach to the layout of development as required by the PPG.

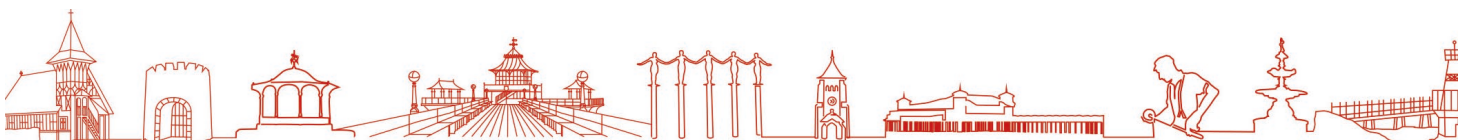
Table 1: Proposed sites with small areas subject to flood risk

Proposed residential allocation in Reg 19 document	Details
North west Nailsea	The western edge of the site accounting for around 35% of the site is indicated to be at greater risk in future related to tidal flood risk and future sea level rise.
Broadleaze Farm, Winscombe	A narrow band of fluvial flood zone accounting for around 13% of the site passes through the site

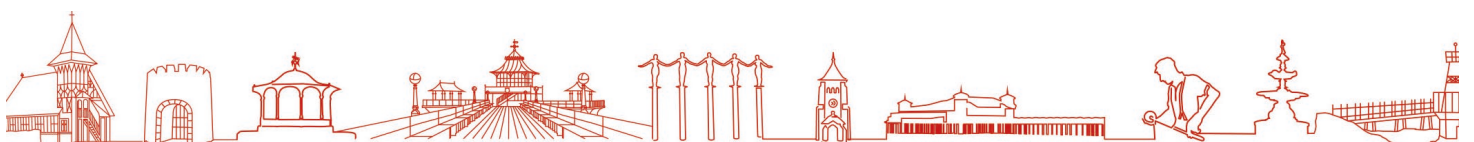
### Proposed residential sites with large parts coinciding with areas at risk of flooding

- 2.6 The remaining 18 proposed sites (see Table 2 – sites can be viewed on the Local Plan [Policies Map](#)) have large areas, or are entirely affected by current or future flood risk relating to either tidal or fluvial flood risk. These are subject to sequential assessment in this document.
- 2.7 These sites are located within the settlement boundaries of Weston-super-Mare, Clevedon, and Portishead, with the majority located within Weston-super-Mare. These three towns have large parts that are subject to tidal flood risk. By comparison, Nailsea is located on higher ground, inland and does not have the same flood risks. All of these sites are primarily subject to tidal flood risk 3a all being towns on the coastline. Whilst there are coastal flood defences in place, a sequential assessment is required to consider whether the development can be directed to sequentially preferable areas.

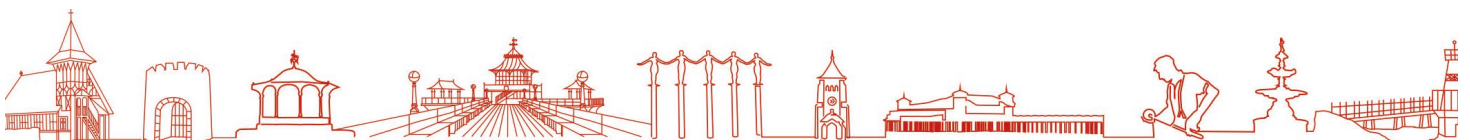
Table 2: Proposed sites with large parts, or entirety subject to flood risk.



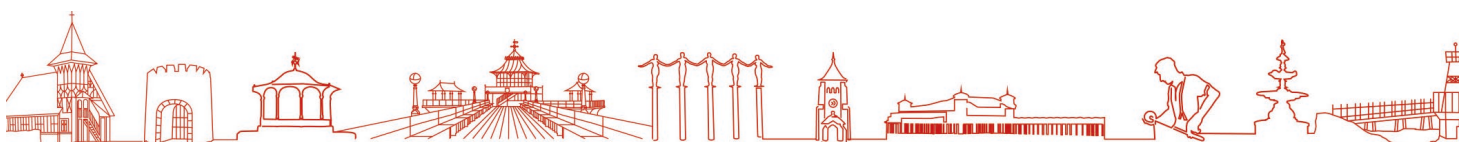
Proposed residential allocation in Reg 19 document	Location	Development proposed	Flood status
Land to the rear of Locking Road, Weston-super-Mare	Weston-super-Mare urban area	12 Dwellings proposed	Tidal zone 3 affecting 100% of site based upon review of National Flood Map.
Dolphin Square, Weston-super-Mare	Weston-super-Mare urban area	80 Dwellings proposed	Not currently indicated to be at risk based upon review of National Flood Map, however 100% of site area indicated to be at greater tidal risk by 2125.
Land to the west of Winterstoke Road, Weston-super-Mare	Weston-super-Mare urban area	134 Dwellings proposed	Tidal zone 3 affecting 90-100% of site based upon review of National Flood Map.



<b>Proposed residential allocation in Reg 19 document</b>	<b>Location</b>	<b>Development proposed</b>	<b>Flood status</b>
Gas works, Winterstoke Road, Weston-super-Mare	Weston-super-Mare urban area	95 Dwellings proposed	Tidal zone 3 affecting around 75-90% of site based upon review of National Flood Map, but indicated to be entirely at tidal risk by 2125.
Former Bournville School Site, Selworthy Road, Weston-super-Mare	Weston-super-Mare urban area	48 Dwellings proposed	Tidal zone 3 affecting 100% of site based upon review of National Flood Map.
Former Sweat FA site, Winterstoke Road, Weston-super-Mare	Weston-super-Mare urban area	37 Dwellings proposed	Tidal zone 3 affecting 100% of site based upon review of National Flood Map.
Land north of Churchill Avenue, Clevedon	Clevedon urban area	44 Dwellings proposed	Tidal zone 3 affecting 100% of site based upon review of National Flood Map.

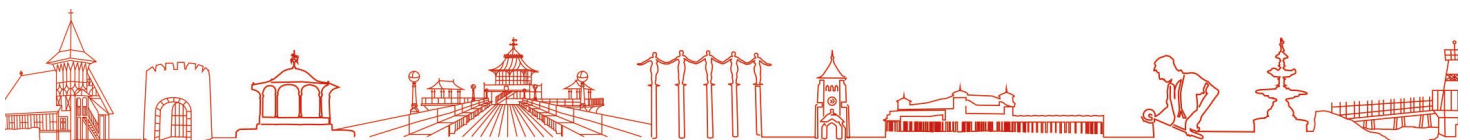


Proposed residential allocation in Reg 19 document	Location	Development proposed	Flood status
Land off Millcross, Clevedon	Clevedon urban area	70 Dwellings proposed	Tidal zone 3 affecting 100% of site based upon review of National Flood Map.
Police Station/Magistrates Court/Roselawn, Weston-super-Mare	Weston-super-Mare urban area	70 Dwellings proposed	Not currently indicated to be at risk based upon review of National Flood Map, however 100% of site area indicated to be at greater tidal risk by 2125.
Former TJ Hughes Store, High Street, Weston-super-Mare	Weston-super-Mare urban area	32 Dwellings proposed	Not currently indicated to be at risk based upon review of National Flood Map, however 100% of site area indicated to be at greater tidal risk by 2125.

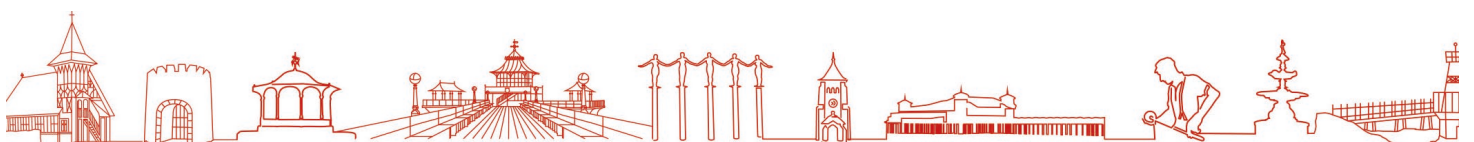




<b>Proposed residential allocation in Reg 19 document</b>	<b>Location</b>	<b>Development proposed</b>	<b>Flood status</b>
Sunnyside Road, Weston-super-Mare	Weston-super-Mare urban area	120 Dwellings proposed	Tidal zone 3 affecting around 50% of site based upon review of National Flood Map, but indicated to be entirely at tidal risk by 2125.
Locking Road Car Park, Weston-super-Mare	Weston-super-Mare urban area	230 Dwellings proposed	Tidal zone 3 affecting around 75 -90% of site based upon review of National Flood Map, but indicated to be entirely at tidal risk by 2125.
Knightstone Road Hotels, Weston-super-Mare	Weston-super-Mare urban area	40 Dwellings proposed	Tidal zone 3 affecting 100% of site based upon review of National Flood Map.
Woodspring Stadium, Weston-super-Mare	Weston-super-Mare urban area	100 Dwellings proposed	Tidal zone 3 affecting 100% of site based upon review of National Flood Map.



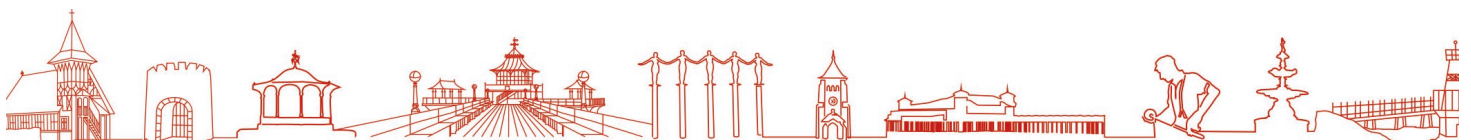
Proposed residential allocation in Reg 19 document	Location	Development proposed	Flood status
Former Police Depot, Winterstoke Road, Weston-super-Mare	Weston-super-Mare urban area	36 Dwellings proposed	Tidal zone 3 affecting around 50% of site based upon review of National Flood Map, but indicated to be entirely at tidal risk by 2125.
Leisuredome site and Parklands Site B/Phase E, Weston-super-Mare	Weston-super-Mare urban area	400 Dwellings proposed	Tidal zone 2 affecting around 50-75% of site based upon review of National Flood Map, but indicated to be entirely at tidal risk by 2125.



Proposed residential allocation in Reg 19 document	Location	Development proposed	Flood status
Wyndham Way Broad Location	Portishead urban area	350 dwellings town centre uses, and a net increase in employment space. As a mixed use site with uncertainty as to the eventual distribution of these uses a cross the site, the sequential assessment assumes alternative sites to accommodate the overall Broad Location Area.	Tidal zone 2 affecting around 90% of site, and zone 3, 50-75% based upon review of National Flood Map, but indicated to be entirely at tidal risk by 2125.
Castlewood, Clevedon	Clevedon urban area	120 Dwellings proposed	Tidal zone 3 affecting 100% of site based upon review of National Flood Map.

## Business development proposals

2.8 The Pre-submission Local Plan proposes 16 separate employment/ business use allocations. 14 of these are either part or entirely within a



current or future flood risk zone. 7 of the 14 have an existing consent for employment development or development as part of the larger Weston Villages development for which the Strategic Flood Solution has been implemented. The remainder of this document is concerned with proposed 7 sites that are unconsented where part or all of the site is within a defined area at risk of current or future tidal or fluvial flooding.

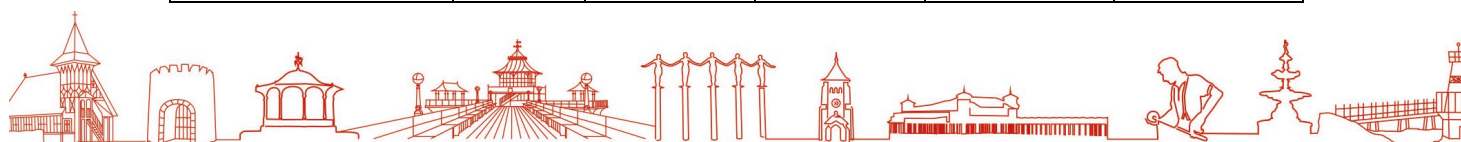
2.9 The following proposed employment sites are subject to a sequential assessment and the boundaries of these can be viewed on the [Policies Map](#) under proposed Policy LP2: *Housing, employment, and mixed use allocations*, and listed under Schedule 2 of the Pre-submission Local Plan. All of these with the exception of east of J20 are existing business allocations in the Site Allocations Plan (2018) that are proposed to be carried forward into the new local plan.

- Land to the west of Kenn Road
- Land east of J20, Clevedon
- West Wick Business Park, WsM
- Summer Lane, north of A370
- Gordano Gate, Portishead
- Moor Park, A371
- Aisecombe Way, WsM

2.10 Table 3 identifies the relevant flood source and indicative extent of coverage across the site.

Table 3: Tidal and fluvial flood risk approximate coverage on site

<b>Proposed business allocation in Pre-submission document</b>	<b>Zone 2 (%)</b>	<b>zone 3a tidal (%)</b>	<b>zone 3b tidal (%)</b>	<b>zone 3a fluvial (%)</b>	<b>zone 3b fluvial (%)</b>
Gordano Gate, Portishead	90	35	0	5	0
West Wick Business Park - Land adjacent to west of M5	100	100	0	0	0
Summer Lane, North of A370	100	40		50	30

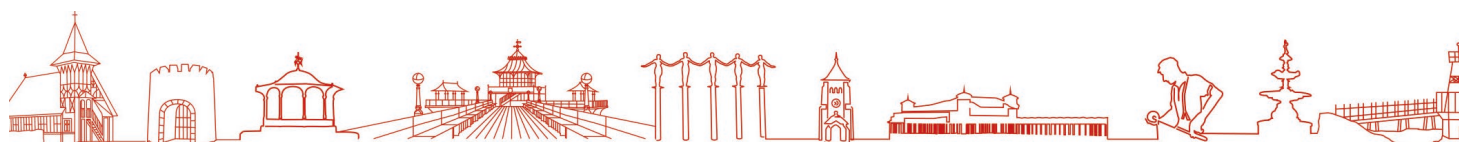


Proposed business allocation in Pre-submission document	Zone 2 (%)	zone 3a tidal (%)	zone 3b tidal (%)	zone 3a fluvial (%)	zone 3b fluvial (%)
Moor Park, A371	100	100	0	5	0
Aisecombe Way, Weston-super-Mare	100	90	0	0	0
West of Kenn Road	100	100	0	0	0
East of Junction 20, Clevedon	100	100	0	0	0

## Selection of an appropriate area of search for alternative sites.

### Residential proposals

- 2.11 The area of search for sequentially preferable sites is within the relevant town urban area as defined by the current designated settlement boundary. This approach is in line with the current policy approach as set out in Core Strategy Policy CS3, and the same approach to the area of search is proposed within the Pre-submission Local Plan (See proposed Policy DP9: *Flood Risk*). This approach also reflects findings of the Sustainability Appraisal for the Local Plan 2039 in terms of the wider sustainability benefits of focusing development in urban areas, including the reuse of brownfield land.
- 2.12 Seeking alternative sites within the existing urban area therefore reflects the objectives of maximising residential development within existing urban areas with the benefits this brings in terms of maximising the use of brownfield land, minimising pressure on greenfield sites, and focussing development close to existing services and facilities and public transport infrastructure in line with the plan's spatial strategy.



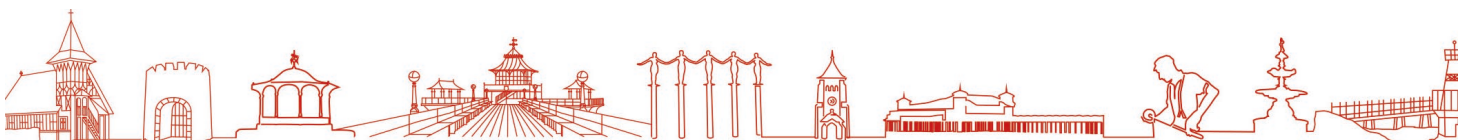
## Business development proposals

### Sites within the town settlement boundaries

- 2.13 Four of the seven sites (*West Wick Business Park; Summer Lane; Gordano Gate; and Aisecombe Way*) are within the defined urban areas of Weston-super-Mare and Portishead. The area of search for these sites is the relevant town urban area with the same policy basis as explained above for residential proposals.

### Sites outside of the towns but requiring access to the Strategic road network

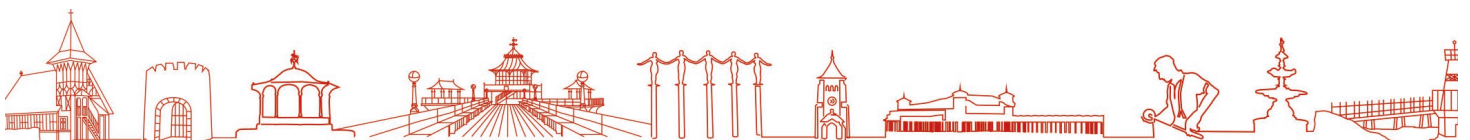
- 2.14 The remaining three sites (*West of Kenn Road; East of J20; and Moor Park*) fall outside of the main town settlement boundaries and the starting point is a district-wide search area, unless a more focused search area is justified based upon the specific needs or catchment area of the development proposed. Paragraphs 2.15 to 2.17 provide justification for a more focused area of search for these business sites.
- 2.15 West of Kenn Road, East of J20, and Moor Park proposed business sites are considered to benefit from and indeed be reliant upon a location in close proximity to the Strategic Road Network (SRN), notably good access to the M5 motorway. Successive employment land evidence prepared in North Somerset has emphasised the opportunity along the M5 corridor, the commercial attractiveness of proximity to the motorway for certain types of business activity, and the future demand for such uses.
- 2.16 In 2016 the West of England Economic Development Needs Assessment (EDNA) identified a Functional Economic Market Area relating to the West of England area. However, it also emphasised the significance of the M5 corridor from Weston-super-Mare to Bristol. Addressing this corridor, the EDNA stated that:
- “Weston-super-Mare is a sufficiently large settlement and far enough away from Bristol to have a degree of economic self-sufficiency and thus its own sub-market. Due to its proximity it also forms part of a M5 corridor sub-area that stretches into Avonmouth around Portbury and includes Clevedon, Nailsea and Portishead”* (paragraph 4.37).
- 2.17 In 2018, an Employment Land Review highlighted the importance of proximity to the M5 for the allocated business sites at Moor Park and West of Kenn Road. This was reiterated later in 2020 through the West of England Employment Land and Spatial Needs Assessment (ELSNA).



Addressing the West of England Logistics and Distribution Market, the ELSNA stated in 4.4.2:

*“Areas in North Somerset and along the M5 corridor are likely to experience an increased proportion of demand as supply reduces elsewhere – including Weston-super-Mare, Portishead, and Clevedon.”*

- 2.18 This is borne out by land being promoted in these areas especially WsM and Clevedon, including at the Land West of Kenn Road and East of J20 proposed sites. The types of business proposed on these sites require a motorway location and this was emphasised through an analysis of business space locational requirements through the ELSNA (e.g. Table 5-1).
- 2.19 The latest evidence on employment land requirements for North Somerset (Hardisty Jones Associates, (2023) *Employment Sites and Premises Evidence*) also reflects this demand with a significant demand indicated for B8 (warehousing) space. This document too, draws a reference to the significance of the M5 corridor to distribution and logistics and within the Sector Profiles set out in Appendix 2, references a current lack of supply for such uses in this area particularly to satisfy the larger distribution, manufacturing, and logistics requirements. This message was also emphasised by local commercial agents at a business workshop as part of the Pre-submission Local Plan preparation.
- 2.20 The allocation of the East of Clevedon site has the following reference within the Justification to Policy SP9:
- “At Clevedon, a new 25ha business site is proposed to the east of J20 of the M5 with a focus on distribution, logistics, and warehousing demands, well located to the strategic road network.”*
- 2.21 Accordingly, the east of Clevedon site and similarly, the west of Kenn Road site is considered to meet a specific demand for commercial business needs that require a location well connected to the Strategic Road Network, and a large amount of land able to accommodate large format warehousing, distribution and logistics type business space. Accordingly, the area of search for these sites is proposed to form a corridor along the M5.
- 2.22 The Moor Park site is also considered to meet a specific demand for commercial business needs that require a location well connected to the Strategic Road Network, notably the M5. It is also likely to respond more to the Weston commercial market. The Employment Land Review (2018) noted the accessibility to the M5 for this site. The area of search for this



proposed development is proposed to form a corridor along the M5 corridor and the wider Weston-super-Mare settlement area.

## Identification of alternative sites within the area of search

### Residential proposals

2.23 The sequential assessment for this document has drawn upon information in the North Somerset Urban Intensification: Interim Report (April 2021). This document identified sites within the respective urban areas considered to have development potential over the plan period and these sites were carried forward into the SHLAA. Having identified the suitability in principle of these sites, they form a source of potential that can be considered in sequential assessments within the urban areas.

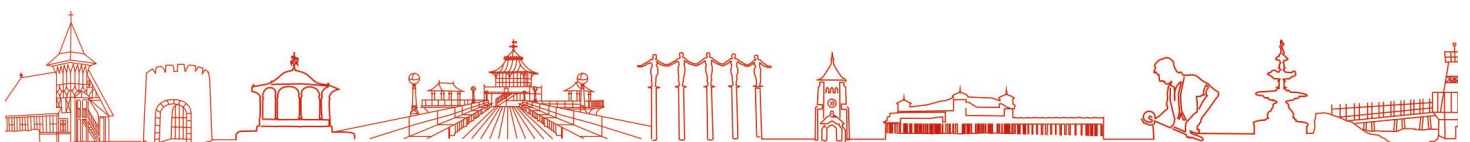
2.24 In addition, information the council hold on land availability has been used to determine whether alternative sites at a lower flood risk could be utilised within the towns to accommodate the scale of development proposed.

### Business development proposals

2.25 The sequential assessment for this document has drawn upon information from a previous call for sites carried out in 2020 where sites have been submitted to the Council for consideration for employment use, and in many cases other uses too.

2.26 In addition, information the council hold on land availability has been used to determine whether alternative sites at a lower flood risk could be utilised within the broad areas of search identified for the 7 business sites.

2.27 Any alternative candidate sites identified can be compared to the proposed sites to identify whether they form 'reasonably available' alternative at a lower risk of flooding. This should include a comparison of the flood zone status of any alternatives.



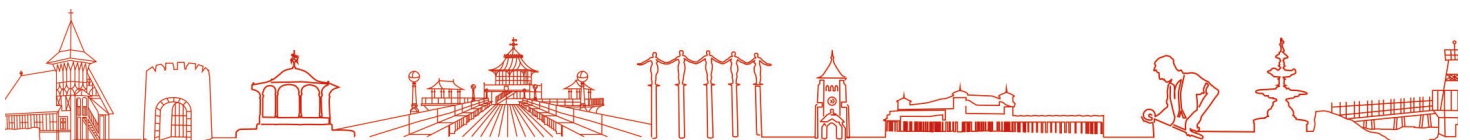


## 3. Assessment

### Residential proposals

#### Portishead

- 3.1 Sequentially preferable land has been considered to accommodate the development proposed in Portishead on those sites identified in Table 1. For Portishead this is the Wyndham Way Broad Location.
- 3.2 The Urban Intensification Interim Report (April 2021) identified 2 sites in Table 1 within Portishead identified as having potential during the local plan period. These include the Old Mill Road site and land at Downside. Downside is sequentially preferable but is already proposed for development in the Pre-submission local plan and could not accommodate the scale of development proposed at the Wyndham Way Broad Location. The Old Mill Road site is within the wider Wyndham Way Broad Location area.
- 3.3 Within Appendix 2 of the Urban Intensification Interim Report 3 other sites were considered in the Portishead area but deemed unlikely over the plan period. Therefore, these are not considered suitable alternatives for the delivery of development as they would be unlikely to be available for development at the point in time envisaged for the development. They are also considerably smaller than the Wyndham Way site.
- 3.4 The latest Strategic Housing Land Availability Assessment does not indicate any further potential sites in Portishead, and there are not alternative sites with planning permission that could accommodate the proposed development at a lower flood risk.
- 3.5 For the single site proposed in Portishead within the Pre-submission Local Plan that coincides with land at risk from flooding, review of the Urban Intensification Report and other information on land availability indicates there to be no sequentially preferable sites that fit the 'reasonably available' definition as set out in the Flood Risk and Coastal section of the PPG. Whilst the Downside site is within flood zone 1, it is already proposed within the Pre-submission Local Plan and is not of a scale able to accommodate the development proposed on the Wyndham Way site.

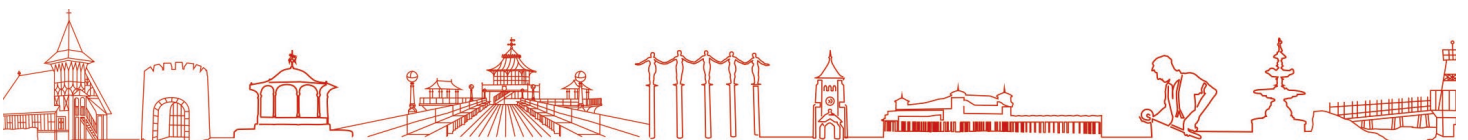


### Weston-super-Mare

- 3.6 Sequentially preferable land has been considered to accommodate the development proposed in Weston-super-Mare on those sites identified in Table 1.
- 3.7 The Urban Intensification Interim Report (April 2021) identified 16 sites within Table 1 within Weston-super-Mare identified as having potential during the local plan period. These are either already proposed for development in the Pre-submission local plan or are not sequentially preferable in flood risk terms. Of the 16 sites, only Lynton House Hotel is sequentially preferable in flood risk terms however it is a relatively small site and is not under construction.
- 3.8 Within Appendix 2 of the Urban Intensification Interim Report, 39 other sites were considered in the Weston-super-Mare area but deemed unlikely over the plan period. Therefore, these are not considered suitable alternatives for the delivery of development as they would be unlikely to be available for development at the point in time envisaged for the development. Many are also similarly subject to flood risk, as is much of the urban area of the town of Weston-super-Mare.
- 3.9 The latest Strategic Housing Land Availability Assessment does not indicate any sequentially preferable potential sites in Weston-super-Mare, and there are not alternative sites with planning permission that could accommodate the proposed development at a lower flood risk.
- 3.10 For the fourteen sites identified above, review of the Urban Intensification Report and other information on land availability indicates there to be no sequentially preferable sites to accommodate the proposed development.

### Clevedon

- 3.11 Sequentially preferable land has been considered to accommodate the development proposed in Clevedon on those three sites identified in Table 1.
- 3.12 Appendix 2 of the Urban Intensification Interim Report (April 2021) identified 3 sites in Clevedon identified as having potential during the local plan period. These include the Millcross site, and land north of Churchill Avenue, that are both already proposed for allocation. Land at Great Western Road now has planning consent. None of these sites are sequentially preferable and are the subject of this assessment being proposed for residential development.



- 3.13 Within Appendix 2 of the Urban Intensification Interim Report, 5 other sites were considered in the Clevedon area, including the Castlewood site that is now a proposed allocation, but were deemed unlikely over the plan period. Therefore, aside from the Castlewood site, these are not considered suitable alternatives for the delivery of development as they would be unlikely to be available for development at the point in time envisaged for the development. Many are also similarly subject to flood risk, as is much of the southern half of the town of Clevedon.
- 3.14 The latest Strategic Housing Land Availability Assessment does not indicate any sequentially preferable potential sites in Clevedon, and there are not alternative sites with planning permission that could accommodate the proposed development at a lower flood risk.
- 3.15 For the three sites identified above, review of the Urban Intensification Report and other land availability information indicates there to be no reasonably available, and sequentially preferable sites to accommodate the proposed development.

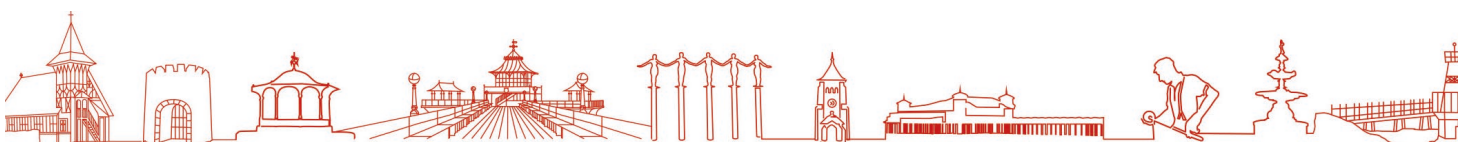
## Business development proposals

- 3.16 Proposed business sites within the towns (*West Wick Business Park; Summer Lane; Gordano Gate; and Aisecombe Way*)

None of the relevant call for sites submitted for employment use are located within the respective town boundaries are sequentially preferable. Two sites, Old Mill Road, Portishead, and Woodview Terrace, Weston are within the urban areas but are located within flood zone 3a. The Old Mill Road site is also a proposed allocation as part of the wider Wyndham Way Broad Location. There are also no sites identified with planning permission for a similar business use within the respective towns that could accommodate the proposal at a lower risk of flooding.

- 3.17 East of J20 business site

Alternative sites have been assessed with reference to other similar commercial sites being promoted to the Local Plan. The most notable alternative site is located to the east of Junction 21 (SHLAA site reference HE20496 *Land east of J21*) that is being promoted for mixed use commercial and residential development. However, whilst this opportunity is potentially available to be developed at a similar point in time as the East of J20 site, this site is not assessed as being sequentially preferable as it is not at a lower risk of flooding. There are no other comparable alternative sites identified that could accommodate the proposed



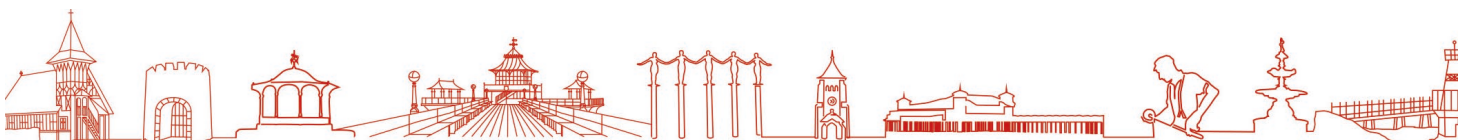
development at a lower flood risk, including with reference to any sites with planning permission for the proposed use, other sites being promoted along the M5 corridor or any alternative allocated sites.

### 3.18 West of Kenn Road site

The only comparable opportunity to accommodate the scale of employment proposed is identified on flood zone 1 land east of J21 as part of the proposed Wolverhill development. However, it is unlikely that the employment land at Wolverhill would meet the same type of business development as the West of Kenn Road site due to it falling within a proposed, residential/ mixed use area., In addition, employment at Wolverhill is unlikely to be available to be developed at a similar point in time. Another key difference between these sites, is the existing allocated status of the West of Kenn Road site compared to the Wolverhill employment land that requires adoption of the new local plan to confirm the proposal in principle. This further differentiates the 'point in time' requirement associated with paragraph 28 of the Flood Risk and Coastal Change section of the PPG.

### 3.19 Moor Park site

The only likely alternatives are identified employment land at Parklands Village and Wolverhill. At Parklands there is 0.7ha of land proposed for allocation in a lower flood risk area (Parklands Village Site H, and Parklands Village Site I), however these are not sufficiently large enough to compared to the Moor Park site. The emerging employment land at Wolverhill (6.5ha as part of the Wolverhill Strategic Location -see Policy LP1 of the Pre-submission plan) is unlikely to be available to be developed at the same point in time in comparison to the Moor Park site that is a standalone business site. Similar to the employment sites considered within the Weston settlement boundary, there are also not any identified alternative business sites in a lower flood risk area that could accommodate this proposal.



## 4. Approach to sequential assessment of small site windfalls

4.1 The Pre-submission Local Plan proposes within Policy DP9: *Flood risk* that small site windfalls (less than 10 dwellings) within the settlement boundaries of Weston-super-Mare, Portishead, and Clevedon should not be subject to the sequential test at the planning application stage. This is due to the need to accommodate such development within those towns at sustainable locations for development and in order to deliver the identified housing requirement.

4.2 The Pre-submission Local Plan identifies a small-site windfall component as an element of supply including at Weston-super-Mare, Clevedon, and Portishead. The windfall supply within those towns is underpinned by the windfall information presented in the Strategic Housing Land Availability Assessment published separately. A significant element of this is anticipated to come forward on previously developed land such as urban infill sites/ redevelopment proposals that are likely to fall within a flood risk area. Such proposals are assumed to have passed the sequential test but would still be required to ensure through a flood risk assessment that the development would be safe over its lifetime, and flood risk would not be increased elsewhere, incorporating appropriate measures to address any residual flood risk.

## 5. Conclusions

5.1 For the proposed residential sites identified in Table 1, based on the sources considered, there are no reasonably available, sequentially preferable sites that are identified as having potential within the plan period, within the defined settlements of the proposed sites, and that are not already proposed as part of the Pre-submission Local Plan.

5.2 For the proposed employment sites considered as set out in paragraph 2.9, there are not considered to be reasonably available and sequentially preferable sites to those proposed either within Weston-super-Mare or Portishead, or in close proximity to the M5 corridor with respect to Moor Park, East of Clevedon, and West of Kenn Road.

5.3 Sites (both small scale windfall and allocated sites) proposed within the Pre-submission Local Plan that are within an identified flood zone are therefore considered to pass the sequential test.

