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1. Introduction

- 1.1 National Planning Policy Framework (NPPF) paragraph 170 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 172 of the NPPF require that plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. This includes application of the sequential test to assess whether there are ‘reasonably available’ alternative sites that could accommodate the proposed development.
- 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 Exception Test is also required in line with NPPF paragraph 177 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.
- 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 2041. This includes residential, regeneration sites within the main towns of Weston-super-Mare, Clevedon, and Portishead, community uses, 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) Level 1.
- 1.5 In addition to the sequential test, in line with paragraph 31 of the PPG, an assessment is made as to whether the proposal would provide wider sustainability benefits to the community that outweigh the flood risk. Matters of development safety should be addressed at the planning application stage using the most up to date flood risk information available and based upon the specific development proposal, including consideration of proposed uses, layout of development, access and egress. This should be informed by a robust and comprehensive site-specific flood risk assessment in line with paragraph 178 of the NPPF.



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 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 developments

- 2.2 This section sets out the proposed developments within the Local Plan 2041 that require the sequential test.

Residential proposals

- 2.3 The Pre-submission Local Plan proposes 102 separate residential allocations as set out in Schedule 1 of the plan, in addition to two proposed Broad Locations, at Wyndham Way, Portishead and Monaghan Mushrooms, Langford that comprise residential or mixed use development, making **104** sites in total.
- 2.4 **51** of these are recorded as already having planning permission on part or all of the site, or a resolution to grant and are counted within the committed supply. Of the 52 remaining (including Wyndham Way), **48** 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, reservoir flooding or surface water flooding. Surface water flood risk accounts for the large majority and typically only relates to small parts of the sites that can be managed through the design approach to each site.
- 2.5 **29** of the sites with flood risk (set out in Table 1) are subject to a relatively small area of land at risk of flooding that can be avoided through a sequential approach to the design and layout of development in line with national and local planning policy, thereby avoiding the need for sequential assessment.



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

Proposed residential allocation in Reg 19 document	Commentary
Woodspring Strategic Location	Large area subject to reservoir flood risk however emerging policy LP2 requires that vulnerable development avoids land at higher risk of flooding. Further work is underway assessing flood risk in this location.
Wolvershill Strategic Location	Relatively minor surface water flood risk channels that can be avoided through layout of development.
Weston College Site, Somerset Square, Nailsea	Relatively minor surface water flood risk channels that can be avoided through layout of development.
Land north of Nailsea	Relatively minor surface water flood risk channels that can be avoided through layout of development.
Pound Lane, Nailsea	North fringe of site in flood zone 3a but can be avoided through development layout.
Poplar Farm, Nailsea	Northeastern fringe of site in flood zone 3a but can be avoided through development layout.
Land south of Nailsea	Relatively minor surface water flood risk channels that can be avoided through layout of development.
Land east of Backwell	Relatively minor surface water flood risk channels that can be avoided through layout of development.
Land at Lodway Farm, Pill	Western part of site in flood zone 3a tidal with parts 3b fluvial, but can be avoided through development layout.
Land at Pill Green, Pill	Relatively minor surface water flood risk channels that can be avoided through layout of development.
Land at Ham Green, Pill	Relatively minor surface water flood risk channels that can be avoided through layout of development.



Proposed residential allocation in Reg 19 document	Commentary
Land south of Manor Farm, WsM	Tidal zone 3a on north fringe of site can be avoided through layout.
Greenways Farm, Lyefield Road, WsM	Tidal zone 3a on north fringe of site can be avoided through layout.
Land west of Hutton	Relatively minor surface water flood risk channels that can be avoided through layout of development.
Elm Grove Nursery	Northern fringe of site in tidal flood zone 3a but can be avoided. Depending on location of site access(s), if this crosses land at higher risk of flooding and no alternative route is available, a sequential test assessment will likely be required at application stage.
Land north of Locking	Relatively minor surface water flood risk channels that can be avoided through layout of development.
Land north of Banwell Road/ Elborough	Relatively minor surface water flood risk channels that can be avoided through layout of development.
Downside, Portishead	Relatively minor surface water flood risk channels that can be avoided through layout of development.
Tower Farm, Portishead	Relatively minor surface water flood risk channels that can be avoided through layout of development.
Black Rock, Portishead	Southern edge of site in current or future tidal 3a zone, but can be avoided through development layout.
Land east of Ladymead Lane, Churchill	Relatively minor surface water flood risk channels that can be avoided through layout of development.
North of Pudding Pie Lane, Churchill	Relatively minor surface water flood risk channels that can be avoided through layout of development.



Proposed residential allocation in Reg 19 document	Commentary
Pudding Pie Lane, West, Churchill	Relatively minor surface water flood risk channels that can be avoided through layout of development.
Land south of Jubilee Lane, Churchill	Relatively minor surface water flood risk channels that can be avoided through layout of development.
Woodhill nurseries, Congresbury	Relatively minor surface water flood risk channels that can be avoided through layout of development.
Broadleaze Farm, Winscombe	Relatively minor surface water flood risk channels that can be avoided through layout of development.
Land at Colliters Way, north	Relatively minor surface water flood risk channels that can be avoided through layout of development.
The Inn at Yanley	Northern fringe indicated to be within reservoir flood risk area but can be avoided through layout of development.
Monaghan Mushrooms	Relatively minor surface water flood risk channels that can be avoided through layout of development.

2.6 This leaves **19** sites subject to more significant flood risk that will require a sequential assessment, set out in Table 2. The remainder of this section is concerned with these sites.

2.7 These sites are primarily 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. 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
Oxford Plasma	Yatton	58 dwellings	Current or future tidal zone 3
Land to the rear of Locking Road, Weston-super-Mare	Weston-super-Mare urban area	12 Dwellings proposed	Tidal zone 3a
Dolphin Square, Weston-super-Mare	Weston-super-Mare urban area	126 Dwellings proposed	Current or future tidal flood zone 3.
Land to the west of Winterstoke Road, Weston-super-Mare	Weston-super-Mare urban area	134 Dwellings proposed	Tidal zone 3a
Gas works, Winterstoke Road, Weston-super-Mare	Weston-super-Mare urban area	95 Dwellings proposed	Tidal zone 3a
Former Bournville School Site, Selworthy Road, Weston-super-Mare	Weston-super-Mare urban area	28 Dwellings proposed	Tidal zone 3a
Former Sweat FA site, Winterstoke Road, Weston-super-Mare	Weston-super-Mare urban area	37 Dwellings proposed	Tidal zone 3a
Land north of Churchill Avenue, Clevedon	Clevedon urban area	44 Dwellings proposed	Tidal zone 3a



Proposed residential allocation in Reg 19 document	Location	Development proposed	Flood status
Land off Millcross, Clevedon	Clevedon urban area	50 Dwellings proposed	Tidal zone 3a
Police Station/Magistrates Court/Roselawn, Weston-super-Mare	Weston-super-Mare urban area	19 Dwellings proposed	Tidal zone 3a
Sunnyside Road, Weston-super-Mare	Weston-super-Mare urban area	120 Dwellings proposed	Tidal zone 3a
Locking Road Car Park, Weston-super-Mare	Weston-super-Mare urban area	230 Dwellings proposed	Tidal zone 3a
Knightstone Road Hotels, Weston-super-Mare	Weston-super-Mare urban area	40 Dwellings proposed	Tidal zone 3a
Woodspring Stadium, Weston-super-Mare	Weston-super-Mare urban area	97 Dwellings proposed	Tidal zone 3a
Former Police Depot, Winterstoke Road, Weston-super-Mare	Weston-super-Mare urban area	39 Dwellings proposed	Tidal zone 3a
Leisuredome site and Parklands Site B/Phase E, Weston-super-Mare	Weston-super-Mare urban area	420 Dwellings proposed	Flood zone 3a.
Former Grand Central Hotel, WsM	Weston-super-Mare urban area	33 dwellings	Flood zone 3a.



Proposed residential allocation in Reg 19 document	Location	Development proposed	Flood status
Wyndham Way Broad Location	Portishead urban area	<p>Mixed use urban renewal to include 785 homes, town centre uses and net increase in jobs.</p> <p>As a mixed use site with uncertainty as to the eventual distribution of these uses across the site, the sequential assessment assumes alternative sites to accommodate the overall Broad Location Area.</p>	Current or future tidal 3a zone.
Castlewood, Clevedon	Clevedon urban area	120 Dwellings proposed	Tidal zone 3a.

Gypsy and traveller site proposals

- 2.8 The Pre-submission Local Plan 2041 proposes 2 separate allocations for Gypsy and Traveller pitches, both of which fall within flood zone 3. A separate Gypsies, travellers, and travelling showpeople Background Paper (October 2025), sets out the rationale for site selection and availability of alternative sites.



Business site proposals

- 2.9 The Pre-submission Local Plan proposes 10 separate employment/ business use allocations listed in **Schedule 2** not including business land allocations within the larger strategic locations (Policies LP1, LP2, and LP3). All of these are either part or entirely within a current or future flood risk zone. Five of the 10 have an existing consent for employment development as part of the larger Weston Villages strategic development for which a Strategic Flood Solution has been implemented. The remainder of this document is concerned with the proposed 5 sites listed in Paragraph 2.10 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.
- 2.10 The following proposed employment sites are subject to a sequential assessment and the boundaries of these can be viewed on the policies map under Policy LP5: *Housing, and employment allocations*, and the sites are listed under Schedule 2 of the Pre-submission Local Plan. All of these 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
 - West Wick Business Park, WsM
 - Summer Lane, north of A370
 - Gordano Gate, Portishead
 - Moor Park, A371

Community development proposals

- 2.11 Reviewing the proposed community facilities set out in **Schedule 4** of the Local Plan 2041, allowing for proposals that already have planning permission, the following proposals require a sequential assessment:
- **Land next to village hall, Kewstoke** – replacement primary school
 - **Land fronting Drove Road roundabout** – new primary school and nursery
 - **Land off Smallway, Yatton** – new secondary school



Selection of an appropriate area of search for alternative sites

Residential proposals

- 2.12 The area of search for sequentially preferable residential sites is within the relevant town urban area as defined by the settlement boundary. This approach is in line with the current adopted policy approach as set out in Core Strategy Policy CS3. The same approach to the area of search is proposed within the emerging Local Plan 2041 (See proposed Policy DP9: *Flood Risk*). This approach also reflects findings of the Sustainability Appraisal for the Local Plan 2041 in terms of the wider sustainability benefits of focusing development in urban areas, including the reuse of brownfield land. It is also consistent with recent changes to the PPG in respect of identifying suitable areas of search.
- 2.13 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.
- 2.14 The Oxford Instruments Yatton site is previously developed, although not within a main town. The site currently has a planning application under consideration where the sequential test will need to be considered. This is expected to be determined before the local plan is submitted.

Business development proposals

Sites within the town settlement boundaries

- 2.15 Three of the five sites (*West Wick Business Park; Summer Lane; and Gordano Gate*) 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

- 2.16 The remaining two sites (*West of Kenn Road*; 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.
- 2.17 West of Kenn Road, 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.
- 2.18 In 2018, the [Employment Land and Sites Review](#) highlighted the importance of proximity to the M5 for the allocated business sites at Moor Park and West of Kenn Road. The area of search for these sites is proposed to form a corridor along the M5 corridor and the wider Weston-super-Mare settlement area.

Community proposals

- 2.19 The proposals are all education related and therefore the catchment area for these is related to a specific geographic area to which they will serve. Accordingly, the search area is identified as the same settlement to which the proposal relates.
- Land next to village hall, Kewstoke – **Kewstoke settlement**
 - Land fronting Drove Road roundabout – **Weston-super-Mare settlement**
 - Land off Smallway, Yatton – **Yatton settlement**



Identification of alternative sites within the area of search

- 2.20 Information the council hold on land availability, notably set out in the 2025 Strategic Housing Land Availability Assessment (SHLAA), has been drawn upon to determine the availability of alternative sites that could accommodate **residential** development.
- 2.21 For **business** sites, those sites considered through the Sustainability Appraisal (SA) process and shown in the Employment Sites proformas to the SA report are considered.
- 2.22 For the three **community** uses, a desktop review of available land within or adjacent to the associated settlement outside of areas at risk of flooding has been carried out. This has been compared to land availability information for other uses, especially residential to indicate any constraints to the potential availability of land i.e. due to it being promoted for other uses.



3. Assessment

Residential proposals

Portishead

- 3.1 The SHLAA does not indicate any potential sites in Portishead, beyond those already proposed for allocation that could accommodate the proposed capacity of the Wyndham Way development at a lower flood risk.
- 3.2 SHLAA site HE20U06 – *land at Downside* is a much smaller site, could not accommodate the proposed development at Wyndham Way and in any case is already proposed for allocation in its own right.

Weston-super-Mare

- 3.3 The SHLAA does not indicate any potential sites in Weston-super-Mare, beyond those already proposed for allocation, that could accommodate the proposed residential development within the town at a lower flood risk.
- 3.4 SHLAA site HE208046 – *Worlebury Hill Road*, HE20715 – *Midhaven Rise*, and HE20714 – *Lynton House*, and HE201052 – *Claremont Crescent* are all outside of the flood zone, however are too small collectively to accommodate the proposed development within the town.

Clevedon

- 3.5 The SHLAA does not indicate any additional potential sites in Clevedon on land at a lower risk of flooding.

Business development proposals

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

None of the alternative business sites considered for employment use are located within the respective town boundaries or are sequentially preferable. Two sites, Old Mill Road, Portishead, and Woodview Terrace, Weston-super-Mare are within the urban areas but are located within flood zone 3a. The Old Mill Road site is part of the wider Wyndham Way Broad Location.



3.7 West of Kenn Road site and Moor Park site

Beyond sites already proposed for allocation in the plan e.g. employment provision as part of the Wolverhill Strategic Location, there are no sequentially preferable sites indicated to be available that could accommodate the proposed development at West of Kenn Road and Moor Park, in close proximity to the M5 corridor.

3.8 This reflects the geographic extent of the tidal flood zone that stretches inland from the coast covering much of the land throughout the M5 corridor.

Community development proposals

Kewstoke Primary School

3.9 Given the extensive coverage of flood risk at Kewstoke there are not considered to be any sequentially preferable alternative sites that could accommodate the proposal in the Kewstoke area. Whilst an updated sequential assessment will be required at the point of planning application, the proposal will also be subject to the Exception Test that will ensure the development is safe for its lifetime.

Land fronting Drove Road roundabout

3.10 Upon review of the availability of alternative sites to accommodate the school within the Weston-super-Mare settlement, there are not considered to be any alternative sites that are sequentially preferable and 'reasonably available'. The town is extensively subject to flood risk effectively leaving the hillside outside of land at risk of flooding. However no alternative sites are known in this area that could accommodate the school, particularly on the basis that this would need to be located near to the town centre as this is where the majority of housing growth (and therefore future pupil yield) is expected to be generated.

Yatton Secondary School

3.11 Based upon a desktop review of land availability options in the Yatton area (within the village and adjacent), there are not any identified alternative sites that are reasonably available that could accommodate the school, within a lower flood risk area. At circa 13 hectares, the site is large and the selected site is identified as the most suitable for a school use.

3.12 Part of the site is not within land identified at flood risk and so a sequential approach can be taken to the layout of development locating the buildings and other key elements of the scheme in more suitable parts of the site. If



land at risk of flooding is required once the detailed design has been completed, a sequential test assessment may be required to reappraise the potential for alternative sites.



4. Wider sustainability benefits to the community

- 4.1 Due to the vulnerability of the residential and community uses, the Exception Test will also apply in line with national planning policy. At this stage, requirement of this test associated with demonstrating wider sustainability benefits to the community is considered.
- 4.2 For the residential sites, this is justified since the proposed sites cumulatively meet the housing needs of North Somerset as well as those arising within each of the settlements specifically, in locations consistent with the spatial strategy. The SA has demonstrated the sustainability of the main towns as focal points for a range of services, facilities, infrastructure and employment (see for example SA Main Report Table 4.1 *SA findings for the alternative spatial approaches*). Most of the sites are large sites that will contribute to the regeneration of the town centre locations including redevelopment of brownfield land e.g. *Castlewood* in Clevedon, *Land at Wyndham Way* in Portishead, and the *Gasworks*, *Dolphin Square*, and *Locking Road Car Park* in Weston-super-Mare. The development of these sites will deliver a range of wider sustainability benefits including:
- Meeting development needs in the most sustainable locations in line with the SA;
 - Redeveloping brownfield land;
 - Stimulating regeneration including business, and community uses as well as homes;
 - Providing investment for infrastructure where needs are greatest; and,
 - Making use of many redundant sites lessening the need for greenfield release, thus protecting countryside where possible.
- 4.3 The school proposals are also considered to pass this element since they will provide a wider benefit to the community in meeting education needs close to a large population catchment. Schools also create permanent employment and other direct and indirect benefits within the local economy.



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 could accommodate the proposed development, or that are not already proposed as part of the Pre-submission Local Plan 2041.
- 5.2 For the proposed employment sites considered as set out in paragraph 2.10, 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, and West of Kenn Road.
- 5.3 For the community uses proposed, there are not considered to be any alternative sites available to accommodate the proposals within the associated settlements at areas of lower risk. This reflects both the limited availability of sites to accommodate these uses as well as the extensive flood risk that affects the settlements of Weston-super-Mare, Yatton, and Kewstoke.
- 5.4 The proposed sites are therefore considered to pass the sequential test as set out in national planning policy, although it should be noted that in line with PPG, the sequential test will be required to be carried again at the point of planning application that can take into account any new or additional information on alternative sites.
- 5.5 With regards to the residential and community proposals, the requirement to demonstrate wider sustainability benefits that outweigh the flood risk is considered to be satisfied. In order to justify development of these proposals, the safety element of the Exception Test will need to be confirmed at the point of any future planning application submissions once detailed development proposals and layouts are identified and using the most up-to-date mapping and information on flood risk available at that time.

