

## **Bristol City Council Examination note – Surface water**

This note has been prepared by Bristol City Council as part of the examination of the Bristol Local Plan in response to the Inspectors' document **IN9: Action Points Matters 17 (Weeks 5 and 6) and Matter 18 (Week 7)**.

In particular, the following action point is addressed:

- **The Council undertook to provide additional information in relation to sites where surface water drainage issues have been identified, including demonstrating compliance with national policy.**

### ***1. National planning policy position, the general extent of surface water flooding in Bristol and the approach taken in this note***

1.1 This note summarises the extent to which the proposed development allocations and regeneration areas in the Bristol Local Plan are affected by areas at high risk of surface water flooding (i.e. areas with at least a 1% annual probability of flooding by surface water) and any implications in terms of the sequential and exception tests set out in national planning policy.

1.2 In Bristol, whereas the fluvial/tidal Flood Zones 2 and 3 occur in distinct areas strongly related to the city's watercourses (and therefore form a clear basis for the application of a sequential approach), surface water flood risk tends to occur more diffusely throughout the city. Consequently, many sites are subject to small areas of surface water flood risk which are not necessarily strategically significant.

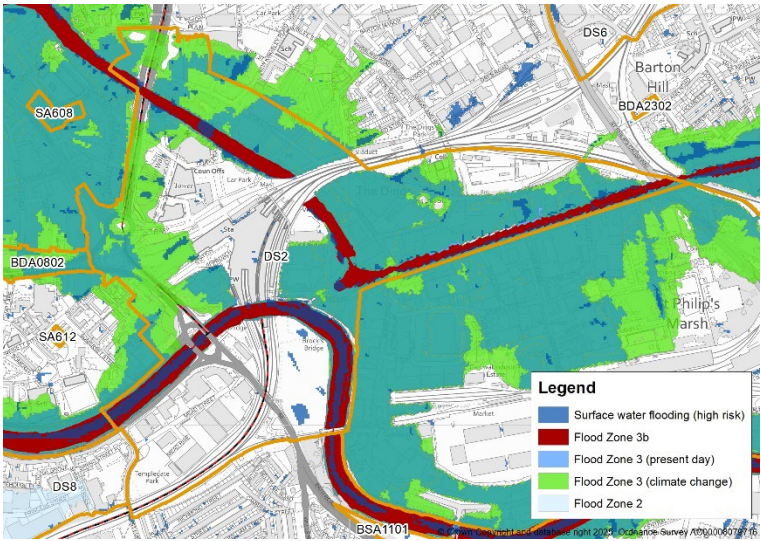
1.3 Paragraph 161 of the NPPF (September 2023), under which the Bristol Local Plan is being examined, states that the sequential, risk-based approach to the location of development should take account of flood risk from all sources. The NPPF and the accompanying Planning Practice Guidance go on to describe how the sequential and exception tests are applied in relation to fluvial/tidal Flood Zones 2 and 3. There is no specific guidance on how other sources of flooding such as surface water should be weighed against the fluvial/tidal flood zones in applying the sequential test.

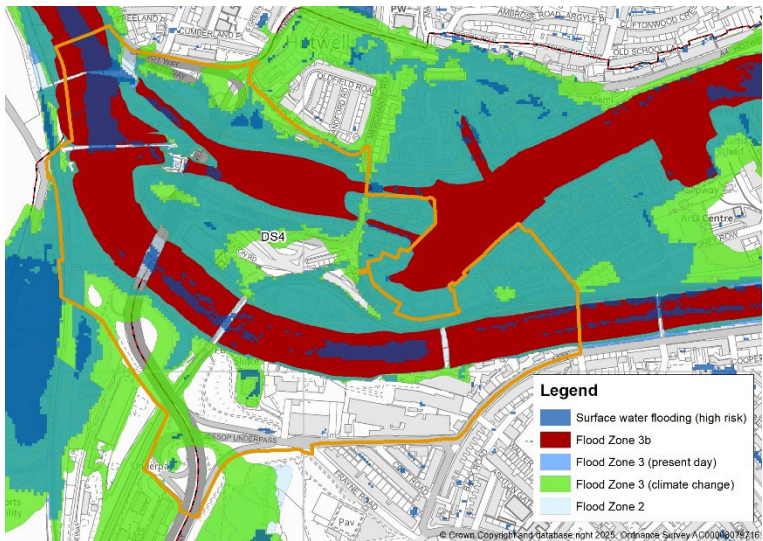
1.4 In the absence of clearer national guidance, the council has treated areas of high surface water flood risk as equivalent to areas within fluvial/tidal Flood Zone 3 for the purposes of the sequential test.

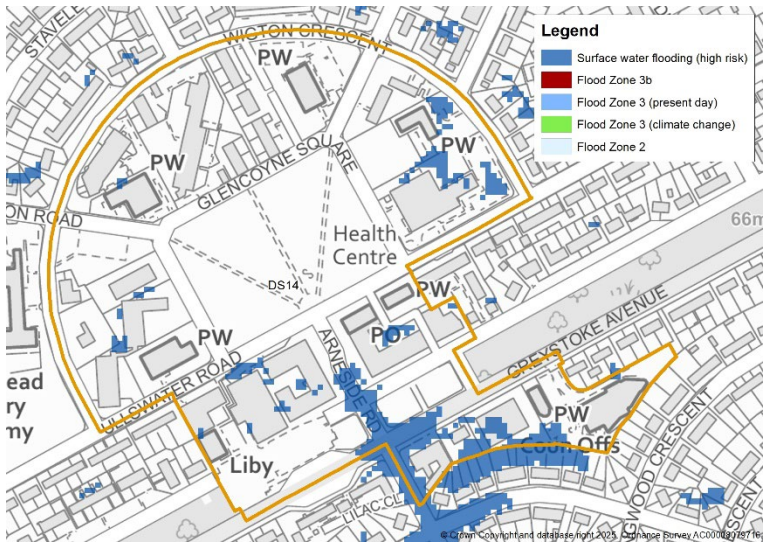
1.5 Where less than 5% of any given development allocation or regeneration area is affected by high surface water flood risk, it has been treated as not strategically significant. Where more than 5% is affected, consideration is given to whether there are any implications in relation to the sequential and exception tests.

1.6 This note determines that there is no change to the overall sequential test position as outlined previously by the council in the BCC Flood risk topic paper update (April 2025) (EXA043). However a main modification is suggested to the development considerations for allocation BSA0906 to reflect the presence of surface water flood risk on the site.

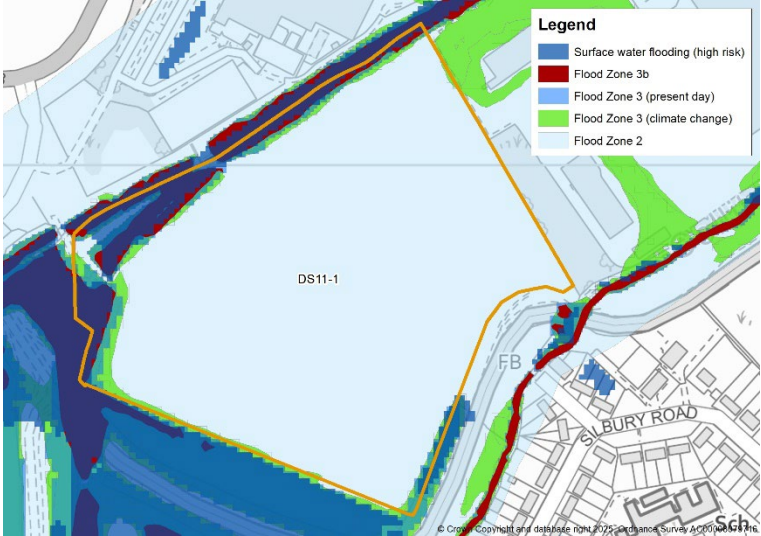
**2. Areas of growth and regeneration**

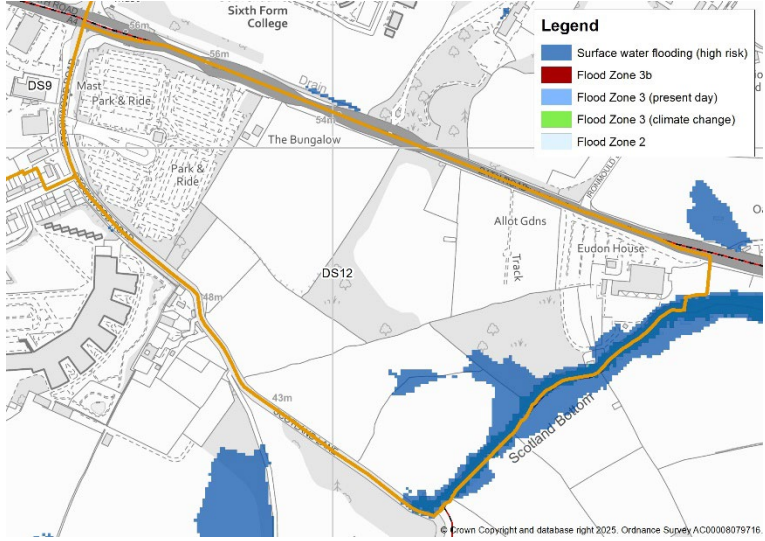
Site	Area (Ha)	Capacity to 2040 (homes)	% High Risk Surface Water Flooding
DS1A Broadmead, Castle Park and the Old City	54	2,793	2.0%
DS2 Bristol Temple Quarter	68	3,656	5.5%
<p>Surface water flood risk is confined largely to the waterways within the area and does not affect the site's sequential suitability on a citywide basis, the potential to carry out an effective sequential test within the area boundary or the potential for development to be made safe for its lifetime in accordance with the exception test.</p> 			
DS3 St. Philip's Marsh	69	1,924	0.9%

Site	Area (Ha)	Capacity to 2040 (homes)	% High Risk Surface Water Flooding
DS4 Western Harbour	36	320	6.6%
<p>Surface water flood risk is confined largely to the waterways within the area and does not affect the site's sequential suitability on a citywide basis, the potential to carry out an effective sequential test within the area boundary or the potential for development to be made safe for its lifetime in accordance with the exception test.</p> 			
DS5 Frome Gateway	15	1,208	4.8%
DS6 Lawrence Hill	56	509	3.2%
DS7 Central Fishponds	34	263	2.6%
DS8 Central Bedminster	53	4,026	2.4%
DS9 Brislington	28	224	1.1%
DS13 Lockleaze	107	829	4.9%

Site	Area (Ha)	Capacity to 2040 (homes)	% High Risk Surface Water Flooding
DS14 Central Southmead	9.5	300	5.9%
<p>Surface water flood risk, while present (with a minor concentration around Greystoke Avenue), does not affect the site's sequential suitability on a citywide basis, the potential to carry out an effective sequential test within the area boundary or the potential for development to be made safe for its lifetime in accordance with the exception test.</p> 			

**3. Green Belt sites**

Site	Area (Ha)	Capacity to 2040 (homes)	% High Risk Surface Water Flooding
DS11-1 Land at Ashton Gate	8.2	500	7.0%
<p>Surface water flood risk is confined largely to the functional floodplain area avoided by the consented development and does not affect the site's sequential suitability for development or the potential for development to be made safe for its lifetime in accordance with the exception test.</p> 			
DS11-2 Land at Elsbert Drive, Bishopsworth	3.5	150	0%

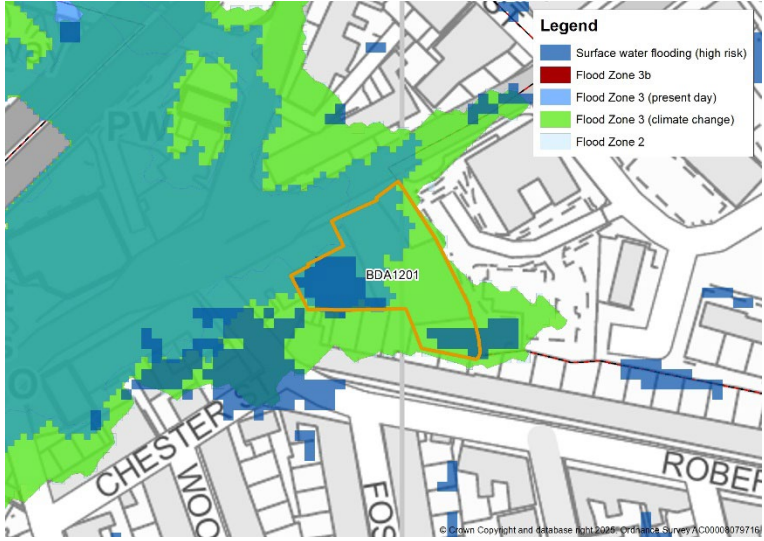
Site	Area (Ha)	Capacity to 2040 (homes)	% High Risk Surface Water Flooding
DS12 Bath Road, Brislington	30	750	5.6%
<p>Surface water flood risk is confined largely to the area around the Scotland Bottom stream and does not affect the site's sequential suitability for development or the potential for development to be made safe for its lifetime in accordance with the exception test.</p> 			

#### 4. Development Allocations

Site	Area (Ha)	Capacity to 2040 (homes)	% High Risk Surface Water Flooding
BDA0103 Land at Cheltenham Road / Bath Buildings, Montpelier	0.14	20	0.6%
BDA0105 Land to the rear of 64-68 Stokes Croft, St. Paul's	0.04	10	0%
BDA0302 Land to West of Ashton Gate Stadium, Marsh Road / Winterstoke Road	2.2	125	2.0%
BDA0304 1-25 Bedminster Down Road, Parson Street	0.24	20	0%
BDA0305 233-237 West Street, Bedminster	0.22	20	0%
BDA0401 Land at Gloucester Road / Merton Road, Horfield	1.2	100	4.2%
BDA0601 Land at Latimer Close, Brislington	0.39	19	0%
BDA0702 Land at Marmalade Lane (south), Brislington	0.56	40	4.7%
BDA0703 Land at Marmalade Lane (north), Brislington	0.15	15	0%
BDA0801 The Grove & Prince Street Car Park, Harbourside	0.49	0	0%

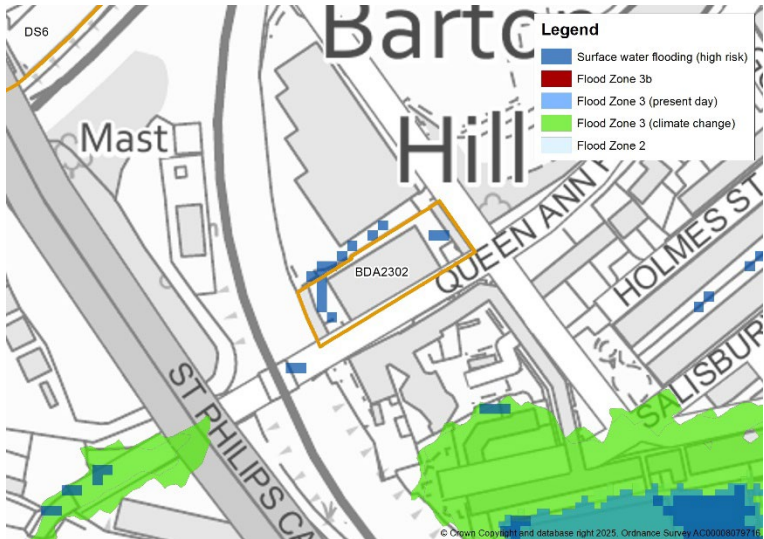
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<b>Site</b>	<b>Area (Ha)</b>	<b>Capacity to 2040 (homes)</b>	<b>% High Risk Surface Water Flooding</b>
BDA0802 Redcliffe Way	3.1	0	0.1%
BDA0901 2-16 Clifton Down Road	0.10	10	0.3%
BDA1001 Land west of Hampton Lane, Clifton Down	0.27	10	3.8%
BDA1002 Land at Whiteladies Gate, Clifton Down	0.19	10	0.2%
BDA1003 Land adjacent Alma Vale Road and Alma Court	0.13	10	0%
BDA1004 Barley House, Oakfield Grove	0.12	20	2.6%
BDA1101 Land at Gibson Road	0.56	10	4.1%
BDA1102 Land at Sydenham Lane	0.34	10	18%

Site	Area (Ha)	Capacity to 2040 (homes)	% High Risk Surface Water Flooding
BDA1201 16-20 Fishponds Road, Easton	0.25	20	25%
<p>Surface water flood risk is confined to the area that is also in Flood Zone 3 and does not affect the site's sequential suitability for development or the potential for development to be made safe for its lifetime in accordance with the exception test.</p> 			
BDA1301 Stapleton Cricket Club	1.1	50	1.4%
BDA1302 Land south of Rose Green Close, Eastville	0.87	50	0%
BDA1303 Land at Hendys Yard, Lower Grove Road	0.31	15	1.3%
BDA1304 Land to the rear of Rose Green Road, Eastville	0.20	10	0%
BDA1305 525 Stapleton Road, Fishponds	0.16	18	3.5%

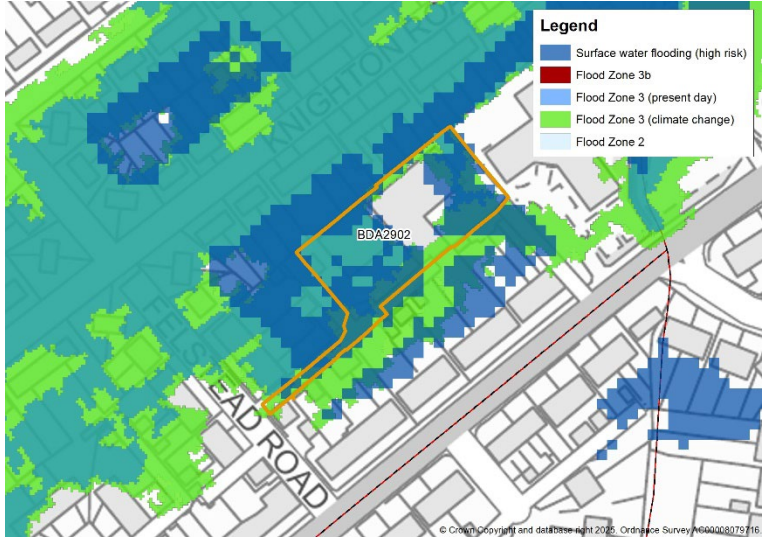
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<b>Site</b>	<b>Area (Ha)</b>	<b>Capacity to 2040 (homes)</b>	<b>% High Risk Surface Water Flooding</b>
BDA1401 Previously developed land at Hartcliffe Way, Bedminster	0.88	55	0.6%
BDA1402 Previously developed land to the west of Redford House, Nover's Hill	0.56	35	1.7%
BDA1501 Land at College Road, Fishponds	0.46	20	0%
BDA1601 Land to the rear of 96 Church Road/ Orchard Drive, Bishopsworth	0.43	25	0%
BDA1702 14 Wyck Beck Road, Brentry	0.26	15	0%
BDA1901 Land at the corner of Lodge Causeway / Berkeley Road, Fishponds	0.20	17	0%
BDA2001 3 Kelston Road	0.46	25	1.4%
BDA2002 272-276 and 290-298 Southmead Road	0.14	10	0%
BDA2101 94-96 & 119 Cumberland Road, Spike Island	0.18	35	0%
BDA2102 Maritime Heritage Centre Public Car Park, Gas Ferry Road	0.76	0	0.6%

Site	Area (Ha)	Capacity to 2040 (homes)	% High Risk Surface Water Flooding
BDA2301 Land to the south of Warwick Road / Oxford Place, Easton	0.22	25	0%
BDA2302 Former Barton Hill Nursery School, Queen Ann Road, St Philips	0.16	12	6.4%
<p>Surface water flood risk is confined to a small area and does not affect the site's sequential suitability for development or the potential for development to be made safe for its lifetime in accordance with the exception test.</p> 			
BDA2401 Bridge Farm, Land at South Hayes, Lockleaze	1.7	15	1.2%
BDA2501 33 Zetland Road, Redland	0.15	10	3.5%
BDA2502 Land at Cossins Road, Redland	0.11	12	0%
BDA2601 Land at Two Mile Hill Road / Charlton Road, St George	0.61	40	1.9%


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<b>Site</b>	<b>Area (Ha)</b>	<b>Capacity to 2040 (homes)</b>	<b>% High Risk Surface Water Flooding</b>
BDA2602 81-83 Two Mile Hill Road, St George	0.23	25	0%
BDA2603 Land at Two Mile Hill Road / Waters Road, St George	0.22	28	0%
BDA2605 Land at Broad Road / Lodge Road, St George	0.19	15	0%
BDA2702 Land at corner of Bryants Hill and Furber Road, St George	0.25	16	0.9%
BDA2703 Land at Nags Head Hill, St George	0.10	10	0%
BDA2801 Land to the south of Blackswarth Road	0.65	75	2.0%
BDA2802 Part of Soaphouse Industrial Estate, Howard St	0.27	20	0%
BDA2803 222-232 Church Road, St. George	0.06	10	0%
BDA2901 Land at Lanercost Road	0.53	35	0.3%

Site	Area (Ha)	Capacity to 2040 (homes)	% High Risk Surface Water Flooding
BDA2902 Works at Felstead Rd	0.32	10	56%
<p>Surface water flood risk is a more significant constraint on this site. However, it is confined to the area of the site that is also in Flood Zone 3 and does not affect the site's sequential suitability for development or the potential for development to be made safe for its lifetime in accordance with the exception test.</p> <p>The development considerations for BSA2902 incorporate requirements in relation to surface water mitigation and drainage.</p>  <p>© Crown Copyright and database right 2022. Ordnance Survey 1000008075716</p>			
BDA3002 1-7 Smyth Road, Southville	0.14	15	0%
BDA3101 Greville EPH, Lacey Road, Stockwood	0.69	25	0.9%
BDA3201 Land at Sanctuary Gardens, Sneyd Park	0.54	20	0%
BDA3301 Former St Ursula's Academy, Brecon Road, Westbury-on-Trym	0.83	35	0%

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<b>Site</b>	<b>Area (Ha)</b>	<b>Capacity to 2040 (homes)</b>	<b>% High Risk Surface Water Flooding</b>
BDA3401 122 Bath Road, Totterdown, Bristol	0.13	20	2.5%
BSA0103 Land to the west and south-west of Deering Close, Lawrence Weston	1.0	20	0%
BSA0111 Land off Ermine Way, Shirehampton	0.19	10	0%
BSA0212 19-21 Pen Park Road, Southmead	0.19	15	0%
BSA0302 Coombe House Elderly Persons' Home, Westbury-on-Trym	0.24	15	0%
BSA0404 BT Depot, Filton Road, Horfield	1.9	60	0.7%

Site	Area (Ha)	Capacity to 2040 (homes)	% High Risk Surface Water Flooding
<p>BSA0502 Glenside Campus, Blackberry Hill, Fishponds</p>	6.8	300	7.9%
<p>Surface water flood risk on this site is concentrated in areas where the fall of the land is interrupted by the existing Grade II Listed buildings on the site. Given that the future redevelopment of this site likely to consist of the conversion of the existing Grade II Listed buildings and any new build will need to respect their character and setting, the areas at risk of surface water flooding are likely to remain undeveloped.</p> <p>Consequently, the surface water flood risk is not considered to affect the site's sequential suitability for development or the potential for development to be made safe for its lifetime in accordance with the exception test.</p> <p>The development considerations for BSA0502 incorporate a requirement for a site-specific flood risk assessment.</p>  <p>The map shows the BSA0502 site (outlined in orange) within the Glenside Campus. It identifies areas of high risk surface water flooding in dark blue, and various Flood Zones: Flood Zone 3b (red), Flood Zone 3 (present day) (light blue), Flood Zone 3 (climate change) (green), and Flood Zone 2 (light blue). Key landmarks include Frome Bridge, Air St, and Quarry Way. The University of the West of England is also labeled.</p>			
<p>BSA0513 Garage site, Woodland Way, Chester Park / Hillfields</p>	0.23	10	0%

Site	Area (Ha)	Capacity to 2040 (homes)	% High Risk Surface Water Flooding
<p>BSA0906 Car Sales site at 62-74 Bell Hill Road, St George</p>	0.19	10	30%
<p>Surface water flood risk is a more significant constraint on this site. However, the site is considered to pass the sequential test for the same reasons as other comparable sites set out in paragraphs 5.11-5.14 of the BCC Flood risk topic paper update (April 2025) (EXA043).</p> <p>In relation to the exception test, if brought forward in accordance with the development considerations set out in the allocation, the redevelopment of this prominent previously developed site on one of the main easterly approaches to central Bristol will offer regeneration benefits that outweigh flood risk. To pass the second part of the exception test, a site-specific flood risk assessment will be required to manage the surface water flood risk without increasing flood risks elsewhere. As well as an appropriate strategy for drainage, this may include raising the floor level of any development of the rear part of the site. Safe access and escape can be provided to Bell Hill Road through the front part of the site.</p> <p>A modification will be required to the development considerations for BSA0906 to address the surface water flood risk. This will be added to the schedule of suggested main modifications (EXA002).</p> 			
<p>BSA0907 47 - 49 Summerhill Road, St George</p>	0.13	10	2.5%

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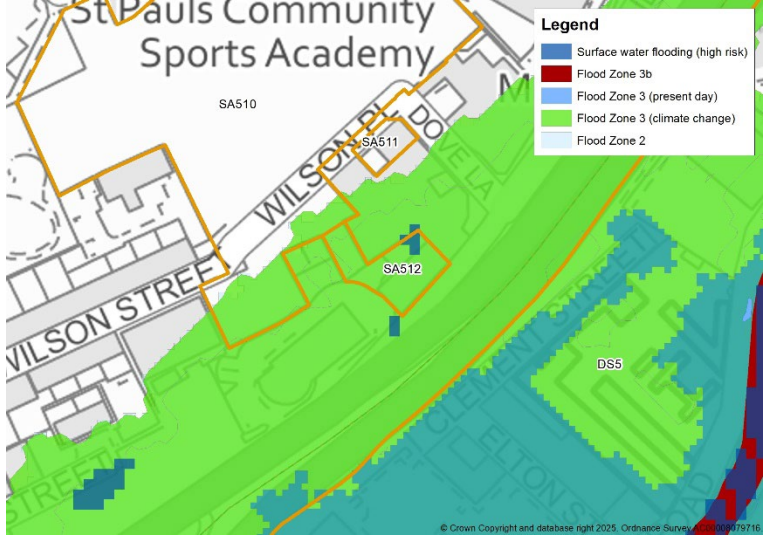
<b>Site</b>	<b>Area (Ha)</b>	<b>Capacity to 2040 (homes)</b>	<b>% High Risk Surface Water Flooding</b>
BSA1011 Site adjacent to Holy Cross Church, Dean Lane, Bedminster	0.12	10	0%
BSA1101 Bath Road Open Space (west of Totterdown Bridge), Totterdown	0.92	40	1.1%
BSA1103 Red Lion Works, Greenleaze Road / Wells Road, Knowle Park	0.44	30	1.1%
BSA1108A Previously developed land at Novers Lane, east of Hartcliffe Way and west of Novers Lane	1.1	60	0%
BSA1109 Land adjoining Hartcliffe Way and Hengrove Way, Inn's Court.	8.8	0	3.5%
BSA1115 Former Florence Brown school, west of Leinster Avenue	1.7	85	1.1%
BSA1116 Open spaces either side of Inns Court Drive	1.5	70	0.2%
BSA1118 Broad Plain House and associated land, Broadbury Road	1.0	50	0%

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<b>Site</b>	<b>Area (Ha)</b>	<b>Capacity to 2040 (homes)</b>	<b>% High Risk Surface Water Flooding</b>
BSA1120 Land and buildings between 2 to 20 Filwood Broadway	0.57	20	0.3%
BSA1122 Sports court and former swimming pool site on the north-east corner of the Filwood Broadway and Creswicke Road	0.53	35	0%
BSA1123 Filwood Library and adjoining land, Filwood Broadway	0.09	10	1.9%
BSA1207 493-499 Bath Road, Kensington Park, nr Arno's Vale	0.71	85	0%
BSA1305 Land to the north-west of Vale Lane, Bedminster Down	0.83	0	0%
BSA1402 Former New Fosseyway School, Hengrove	3.4	175	0.1%
SA101 Wapping Wharf, Wapping Road	3.5	600	0%
SA102 Waterfront Site, Millennium Square	0.45	0	0%
SA202 Land to the west of Lodge Street	0.10	20	0%

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SA301 55-59 St. Michael's Hill	0.06	15	0%
SA403 Old Seaman's Chapel, Royal Oak Avenue	0.20	0	0%
SA404 Gap site, 16 Narrow Quay	0.03	0	0%
SA501 Lakota Nightclub / Former Coroner's Court, Upper York Street / Backfields	0.25	60	0.1%
SA506 97-101 Stokes Croft	0.07	20	2.2%
SA507 27-33 Jamaica Street	0.02	5	0%
SA509 Land at Wilder Street / Argyle Road	0.29	30	0%
SA510 Land at Dove Lane / Ervine Terrace / Wilson Place / Cheapside	1.6	250	0%
SA511 F C Hammonds 13-17 Dove Lane St Pauls	0.03	5	0%

Site	Area (Ha)	Capacity to 2040 (homes)	% High Risk Surface Water Flooding
SA512 109 - 119 Newfoundland Road	0.08	0	5.3%
<p>Surface water flood risk is confined to a small area and does not affect the site's sequential suitability for development.</p> <p>This city centre site at risk of flooding is allocated for less vulnerable uses. The exception test will not be required.</p> 			
SA608 Land and buildings at Victoria Street / Temple Street	0.60	0	1.4%
SA610 Railway cutting, Lower Guinea Street	0.17	0	0%
SA612 The Bell and adjoining buildings, Prewett Street	0.13	15	0%

### **5. Avonmouth Site Allocations**

<b>Site</b>	<b>Area (Ha)</b>	<b>Capacity to 2040 (homes)</b>	<b>% High Risk Surface Water Flooding</b>
ASA001 Land at Kings Weston Lane (south)	27	0	0.3%
ASA002 Land at Kings Weston Lane (north)	5.7	0	0.2%
ASA003 Land east of Packgate Road	4.8	0	0.1%
ASA004 Land east of Chittening Road	18	0	3.4%
ASA005 Land south of Seabank Power Station	2.5	0	2.5%