

Q4. Will the development of West Wisbech be a viable option given flood risk considerations and transport infrastructure requirements?

The Environment Agency did not raise any soundness concerns regarding the allocation in our representations to the proposed submission. Viability and delivery of development are not topics we are required to be consulted on. However, we are mindful of a new duty to enable sustainable economic growth in the Growth and Infrastructure Act 2013.

We would welcome evidence of viability testing or cost estimates for flood mitigation works to deliver the site. If no evidence is present, we acknowledge that there may be significant costs involved in securing typical mitigation as we set out below.

The Wisbech Level 2 SFRA did not investigate mitigation measures in any level of detail, or provide a steer on which mitigation method(s) the development would be likely to need to satisfy exception test criteria. These are that the development is safe, does not increase risks to others, and demonstrates an overall reduction in flood risk.

In terms of safety, the site would be affected by a breach scenario. This would probably require the development to be either further protected or raised up. The extent of raising is not assessed. We advise that floor level raising alone could result in 'tall buildings' or limited ground floor habitable accommodation – e.g. garaging and bathrooms. There is also the risk of potentially unsafe access and egress routes unless roads or paths are raised. Access ramps installed to each building are normally needed to meet Buildings Regulations. More commonly however, sites propose land raising or secondary defences.

Land raising on site would normally involve very substantial costs, and may require storage compensation if it would displace water to various properties that envelope the site. Similarly, secondary defences may involve significant compensatory works. In these scenarios, viability could be a significant issue in the context of other typical infrastructure – transport, open space, schools, drainage, health community etc.

Being defended floodplain, existing policy (PPS25 Practice Guide) does not always insist on floodplain compensation. However if raised ground or secondary defences increase risks to other existing properties [by displacing flood water], compensation would be required. This adds further costs and may imply off-site works and agreements.

Alternatively, the risk of breaching could be reduced by strengthening defences along the stretches liable to flood the site if there were a breach. Whilst this might

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help to reduce risks overall, given the length and size of defences involved, it would involve very significant cost with inevitable impacts of what the development could deliver. We are not aware that these have been calculated or presented in an objective assessment. Landowners would also need to agree.

Conclusion

We advise that we are unaware of but would welcome evidence that could make a preliminary estimate on the costs on the mitigation measures that would be required. Mitigation options would need to be resolved before assessments of any preferred option can be calculated.

Our experience is that in any event, flood mitigation costs could impact significantly on net land take (for flood storage), and have knock on effects for the provision of other infrastructure on site. Sites at lower risk of flooding could have a competitive advantage in terms of wider infrastructure provision.

From our experience, we could not rule out the possibility that the development could be unviable. We find that sites with breach flood risks typically cost significantly more to deliver than is laid bare during the allocation process. Indeed, it was rare to see any such information with a development plan pre-NPPF. Historically, this mismatch has come to light when developers seek to renegotiate key site development principles at pre-application stage, once plan allocations are adopted.

If there is a confirmed absence of viability information, we recommend that the plan is flexible to viability issues. The site development requirements we would advise for the site are minimum in any event, so we advise that there would be limited flexibility for cost saving through reducing mitigation provision on this site through a successful planning application. This suggests to us that any flexibility in the plan would need to be found off site for the scale of development envisaged.

Consistent with our role defined by government, we did not comment on the merits of the flood risk sequential test in the allocation process.