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Milton Keynes Level 2 Strategic Flood Risk Assessment

Final

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This report describes work commissioned by Milton Keynes City Council by an instruction dated 11th August 2025. The Client's representative for the contract was Rachel Larner from Milton Keynes City Council. Erica Godsland and Lucy Archer-Lock of JBA Consulting carried out this work.

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The conclusions and recommendations contained in this Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by JBA has not been independently verified by JBA, unless otherwise stated in the Report.

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Unless otherwise stated in this Report, the assessments made assume that the sites and facilities will continue to be used for their current purpose without significant changes.

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Abbreviations

AEP	Annual Exceedance Probability
AIMS	Asset Information Management System
BGS	British Geological Survey
CC	Climate Change
CCTV	Closed Circuit Television
EA	Environment Agency
FAA	Flood Alert Area
FMfP	Flood Map For Planning
FRA	Flood Risk Assessment
FWA	Flood Warning Area
GIS	Geographical Information System
JBA	Jeremy Benn Associates
LiDAR	Light Detection And Ranging
LLFA	Lead Local Flood Authority
LPA	Local Planning Authority
mAOD	metres Above Ordnance Datum
MKCC	Milton Keynes City Council
NaFRA2	National Flood Risk Assessment 2
NPPF	National Planning Policy Framework
OS	Ordnance Survey
PPG	Planning Practice Guidance
RBD	River Basin District
RMA	Risk Management Authority
RoFSW	Risk of Flooding from Surface Water
SFRA	Strategic Flood Risk Assessment
SuDS	Sustainable Drainage Systems

Definitions

1D model: One-dimensional hydraulic model, typically representing a watercourse and structures within the channel (for example bridges and culverts).

2D model: Two-dimensional hydraulic model, typically representing the floodplain flows.

Annual Exceedance Probability: The probability (expressed as a percentage) of a flood event occurring in any given year.

Brownfield: A previously developed parcel of land.

Climate change: Long term variations in global temperature and weather patterns caused by natural and human actions.

Design flood: A flood event of a given annual flood probability, which is generally taken as: fluvial (river) flooding likely to occur with a 1% annual probability (a 1 in 100 chance each year), or surface water flooding likely to occur with a 1% annual probability (a 1 in 100 change each year), plus an appropriate allowance for climate change, against which the suitability of a proposed development is assessed and mitigation measures, if any, are designed.

Dry island: Land which may not be at risk of flooding itself but is surrounded by flood risk and therefore may become cut off during a flood event.

Flood defence: Infrastructure used to protect an area against floods such as floodwalls and embankments; they are designed to a specific standard of protection (design standard).

Green infrastructure: A network of natural environmental components and green spaces that intersperse and connect the urban centres, suburbs, and urban fringe.

Greenfield: An undeveloped parcel of land.

Lead Local Flood Authority: The unitary authority for the area or if there is no unitary authority, the county council for the area as designated under Flood and Water Management Act 2010.

Local Planning Authority (LPA): The local government body which is responsible by law to exercise planning functions for a particular area.

Main river: A watercourse shown as such on the statutory main river map held by the Environment Agency. They are usually the larger rivers and streams. The Environment Agency has permissive powers (not duties) to carry out maintenance and improvement works on main rivers.

Major development: Defined in the National Planning Policy Framework as a housing development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more, or as a non-residential development with additional floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provide in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (gov.uk).

Natural Flood Management: Techniques that work with nature to reduce the risk of flooding for communities.

Ordinary watercourse: Any river, stream, ditch, drain, cut, dyke, sluice, sewer (other than a public sewer) and passage, above or below ground, through which water flows (water does not need to always flow through it) but which does not form part of a main river. The local authority or internal drainage board has permissive powers (not duties) on ordinary watercourses.

Permissive powers: Authorities have the power to undertake flood risk management activities, but not a duty to do so. This will depend on priorities in flood risk management.

Return period: An estimate of the interval of time between events of a certain intensity or size, in this instance it refers to flood events. It is a statistical measurement denoting the average recurrence interval over an extended period of time.

Riparian owner:. A person who lives on, owns or tenants land next to a watercourse as well as the environment next to a watercourse. This is relevant to both urban and rural locations.

Risk: In flood risk management, risk is defined as a product of the probability or likelihood of a flood occurring, and the consequence of the flood.

Risk Management Authority: The Environment Agency, Lead Local Flood Authorities, District and Borough Councils in an area where there is no unitary authority, Coast Protection Authorities in coastal areas, Water and sewerage companies, Internal Drainage Boards, and Highways authorities.

Standard of Protection (SoP): Defences are provided to reduce the risk of flooding (typically from a river, sea or surface water). A Standard of Protection is usually described in terms of an AEP flood event. For example, a flood embankment could be described as providing a 1% AEP Standard of Protection

Stakeholder: A person or organisation affected by the problem or solution or interested in the problem or solution. They can be individuals or organisations, includes the public and communities.

Sustainable Drainage Systems (SuDS): Sustainable Drainage Systems are methods of management practices and control structures that are designed to drain surface water in a more sustainable manner than some conventional techniques, such as grates, gullies, and channels.

Windfall site: A site which becomes available for development unexpectedly and therefore not included as allocated land in a planning authority's local plan.

Executive Summary

Introduction and context

This Level 2 Strategic Flood Risk Assessment (SFRA) document was prepared with the purpose of providing part of the evidence base for the Local Plan for Milton Keynes City Council. It follows on from the Milton Keynes Level 1 SFRA produced in February 2024 and should be read in conjunction.

The primary purpose of the Level 2 SFRA is to provide an appropriate understanding of the level of flood risk affecting development included in the updated Local Plan. The assessment takes into account all sources of flooding and considers other factors affecting flood risk such as residual risk. The information provided as part of the Level 2 SFRA enables Milton Keynes City Council to apply the Exception Test to sites in accordance with the National Planning Policy Framework (NPPF).

SFRA objectives

The Government's Planning Practice Guidance (PPG) on Flood Risk and Coastal Change advocates a tiered approach to risk assessment and identifies the Level 1 and Level 2 assessments.

The aim of the Level 2 assessment is to build on identified risks from Level 1 for proposed development sites, to provide a greater understanding of tidal, fluvial, surface water, groundwater, and reservoir related flooding risks to the sites. From this the Local Council and Developers can make more informed decisions and pursue development in an effective and efficient manner. The Level 2 assessment also identifies sites for further risk analysis at the site-specific Flood Risk Assessment (FRA) stage.

Level 2 SFRA Outputs

The Level 2 assessment includes detailed assessments of the proposed site options. These include:

- An assessment of all sources of flooding including fluvial flooding, surface water flooding, groundwater flooding, reservoir flooding and the potential increase in surface water flood risk due to climate change.
- Reporting on flood defence infrastructure, where applicable.
- An assessment of existing flood warning and emergency planning procedures, including an assessment of safe access and escape during an extreme event.
- Advice and recommendations on the likely applicability of sustainable drainage systems for managing surface water runoff.
- Advice on whether the sites are likely to pass the second part of the Exception Test with regards to flood risk and on the requirements for a site-specific FRA.

Summary of Level 2 SFRA

As part of the Level 2 assessment 17 sites were taken forwards for further assessment. These sites were screened against flood risk datasets to assess the potential viability and provide flood risk recommendations.

Summary reports were prepared for all 17 sites and multiple sources of flood risk were assessed and can be found in Appendix A. Maps of depth and velocity of flooding as well as hazard mapping have been produced where modelled outputs were available, flood datasets are also outlined in Appendix A. The Risk of Flooding from Surface Water (RoFSW) mapping has also been used. The superseded (pre March 2025) RoFSW dataset has been used to consider depth, hazard and velocity as the NAFRA2 dataset is not currently suitable to support a Level 2 SFRA assessment as the NAFRA2 data does not include depth, hazard and velocity data for surface water. A comparison between the two surface water dataset extents has been undertaken.

The superseded dataset should not be relied upon to inform site specific flood risk assessments and developers should consult with Milton Keynes City Council and the Environment Agency at an early stage to discuss flood risk including requirements for site-specific FRAs.

Each table sets out the National Planning Policy Framework (NPPF) requirements for the site, as well as guidance for site-specific FRAs. A broadscale assessment of suitable SuDS options has been provided to give an indication of potential constraints to surface water drainage and where additional information may be required.

Recommendations

Section 7 sets out the recommendations based on the findings of this Level 2 SFRA. This includes recommendations for applying the Exception Test, where required, requirements for developers in developing the Local Plan allocations, and guidance for windfall sites and development of sites not included within the Local Plan

1 Introduction

1.1 Level 2 SFRA study area

Milton Keynes administrative area is located approximately 80 km north-west of London. The administrative area covers an area of approximately 300 km^2 and had an estimated population of approximately 270,000 in 2020[1]. There are 19 wards in the administrative area, the largest of which is Broughton with a population of approximately 18,000[2]. Milton Keynes administrative area was designated as a New Town in 1967, incorporating the existing towns of Stony Stratford, Wolverton, Bletchley and Fenny Stratford. When designated New Town had a population of 40,000 with an intended population of 250,000. By 2031 Milton Keynes will have an approximate population of 345,000.

Milton Keynes has a very high proportion of parks and open space, including linear parks, balancing lakes and detention ponds as part of the strategic drainage network for the design of the city. These measures were incorporated into the original design of the Milton Keynes administrative area, to prevent the development from exacerbating the flood risk in Newport Pagnell and areas downstream. Outside of the city of Milton Keynes, the surrounding area is rural with villages and small towns.

As discussed in Section 4.4 of the Level 1 SFRA report[3], the primary fluvial flood risk is along the River Great Ouse and its tributaries, including River Ouzel, River Tove, Tongwell Brook and Water Eaton Brook, which present fluvial flood risk to rural communities as well as to the main urban areas in Milton Keynes administrative area. Areas where there are properties at risk from Main River flooding include Newport Pagnell, New Bradwell, Bletchley, Water Eaton and Stony Stratford. Whilst the Main Rivers, by definition, have the greatest flows, small ordinary watercourses can still pose a material risk as they are generally not defended, aren't monitored and modelling is less likely to be available. Key areas at risk of flooding from ordinary watercourses include Stoke Goldington, Tathall End, Lavendon, Calverton and Loughton.

1.2 Purpose of the Strategic Flood Risk Assessment

Paragraph 171 of the National Planning Policy Framework (NPPF)[4] states that strategic policies should be informed by a Strategic Flood Risk Assessment (SFRA) and should manage flood risk from all sources. They should consider cumulative impacts in, or

1 Office for National Statistics (November 2021) Ward-level population estimates (Experimental Statistics) (Mid 2020)
2 Office for National Statistics (November 2021) Ward-level population estimates (Experimental Statistics) (Mid 2020)
3Milton Keynes City Council – Level 1 Strategic Flood Risk Assessment Feb 2024 (Ref: INK-JBAU-XX-XX-RP-HM-0001-A1-C01-Level_1_SFRA)
4https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as Lead Local Flood Authorities (LLFAs).

The Planning Practice Guidance (PPG) Flood Risk and Coastal Change (2025)[5] advocates a staged approach to risk assessment and identifies two levels of SFRA:

- Level 1 SFRA: where flooding is not a major issue and where development pressures are low. The assessment should be sufficiently detailed to allow application of the Sequential Test. Level 1 is completed first to understand whether a Level 2 assessment is required.
- Level 2 SFRA: where land outside Flood Zones 2 and 3 cannot accommodate all the necessary development creating the need to apply the NPPF's Exception Test. In these circumstances the assessment should consider the detailed nature of the flood characteristics within a Flood Zone and assessment of other sources of flooding.

This SFRA report fulfils the requirements for a Level 2 assessment of development sites identified for potential allocation within Milton Keynes and has been prepared in accordance with the NPPF (2024) and PPG (2025).

This report should be read alongside the 2024 Level 1 Milton Keynes Report[3] (Ref: INK-JBAU-XX-XX-RP-HM-0001-A1-C01-Level_1_SFRA) and builds upon information presented within the Level 1 SFRA.

1.3 Milton Keynes City Plan 2050

Milton Keynes City Council published the Draft MK City Plan 2050 in November 2025[6]. The plan seeks to bring transformational change while protecting that which is unique to Milton Keynes City, and most notably seeks to allocate land that can deliver around 37,000 additional homes by 2050.

The strategy contains a number of objectives under the categories:

- People-Friendly and Healthy Places;
- Climate and Environmental Action;
- High-Quality Homes;
- Economic and Cultural Prosperity;
- Central Milton Keynes.

1.4 Milton Keynes City Council's Local Flood Risk Management Strategy

Local Flood Risk Management Strategies set out how Lead Local Flood Authorities (LLFAs) such as Milton Keynes City Council will manage local flood risk i.e. from surface water runoff, groundwater and ordinary watercourses, for which they have a responsibility as

5 https://www.gov.uk/guidance/flood-risk-and-coastal-change

6 https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/mk-city-plan-2050/mk-city-plan-2050

LLFA and the work that other Risk Management Authorities are doing to manage flood risk in Milton Keynes administrative area.

As discussed within Section 2.6.6 of the Level 1 SFRA, the Local Flood Risk Management Strategy 2016[7] sets out the LLFA's plan for managing local flood risk. The objectives for managing flood risk are:

- Ensure that drainage management is tailored to Milton Keynes administrative areas unique drainage system.
- Improve the Council's understanding of flood risk from all sources.
- Ensure future development does not have a negative impact on flood risk and lowers the risk where possible.
- Make best use of resources for maximum protection from flooding.
- Improve public awareness of flooding and help communities to become more resilient to flooding.
- Improve communications between asset owners and build on existing partnership working.
- Ensure emergency planning is linked to the Council's best understanding of the risks.

1.5 Surface Water Management Plans

As discussed in Section 2.6.9 of the Level 1 SFRA, Milton Keynes City Council published the Milton Keynes Surface Water Management Plan (SWMP)[8] in 2016. As part of the SWMP, Critical Drainage Catchments (CDCs) were identified across the administrative area which represent areas of catchments at greatest risk. These are located in Stony Stratford, Newport Pagnell, Olney, West Bletchley, Woburn Sands, Ravenstone, Bradwell Abbey, Wymbush/Two Mile Ash, Medbourne/Crownhill, Brinklow, Oldbrook, Bradwell, Downs Barn and Conniburrow, Stoke Goldington, Lavendon, Bletchley and Fenny Stratford, Bradwell West of Conniburrow, Wolverton, Calverton, Eaglestone, Sherington, Haversham, Tathall End and Bow Brickhill.

1.6 Catchment Flood Management Plans

Catchment Flood Management Plans (CFMPs) are high-level strategic plans providing an overview of flood risk across each river catchment. The Environment Agency use CFMPs to work with other key-decision makers to identify and agree long-term policies for sustainable flood risk management.

7 https://www.milton-keynes.gov.uk/sites/default/files/2022-02/MKC%20LFRMS_FINALpost_consultation_report_COMBINED%20MKFLO004.pdf
8 https://www.milton-keynes.gov.uk/media/2695/download?inline

As discussed within Section 2.6.3 of the Level 1 SFRA, Milton Keynes administrative area falls within the Great Ouse CFMP[9]. The Great Ouse CFMP is complemented by the Anglian River Basin District Flood Risk Management Plan. The actions specific to the Milton Keynes administrative area in the Great Ouse CFMP were:

- Develop a flood risk study for Milton Keynes, the Stratfords and Newport Pagnell to investigate options to reduce flooding.
- Reduce the consequences of flooding by improving public awareness of flooding and encouraging people to sign up to, and respond, to flood warnings.
- Consider developing a surface water management plan for Milton Keynes.
- Develop environmental enhancement projects to improve the natural state of the rivers and their habitats.
- Ensure any policies within the Local Development Framework or any revisions are in line with the CFMP policy.

1.7 SFRA objectives

Objectives of this Level 2 SFRA are to:

1. Assess the flood risk to potential development sites using the latest available flood risk data and climate change uplifts where available;
2. Using available data to provide information and a comprehensive set of maps presenting flood risk from all sources for each site option.
3. Where the Exception Test is required, provide recommendations for making the site safe throughout its lifetime.
4. Consider the most recent policy and legislation in the NPPF, Planning Policy Guidance (PPG) and LLFA Sustainable Drainage Systems (SuDS) guidance.

1.8 Consultation

SFRAs should be prepared in consultation with other risk management authorities. The following parties (external to Milton Keynes City Council) have been approached for comment during the preparation of this Level 2 SFRA:

- Environment Agency
- Anglian Water
- Bedford Group of Drainage Boards

1.9 How to use this report

Table 1-1 below outlines the contents of this report and details how different users can apply this information.

9 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288877/Great_Ouse_Catchment_Flood_Management_Plan.pdf

Table 1-1: Outline of the contents of each section of this report.

Section	Contents	How to use
1. Introduction	Outlines the purpose and objectives of the Level 2 SFRA.	For general information and context.
2. The Planning Framework and Planning Policy for Flood Risk Management	Includes information on the implications of recent changes to planning and flood risk policies and legislation and signposts to relevant sections of the Level 1 SFRA.	Users should refer to this section and the relevant sections of the Level 1 SFRA for any relevant policy which may underpin strategic or site-specific assessments.
3 Level 2 Strategic Flood Risk Assessment	Summarises the data used in the Level 2 detailed site assessments and mapping.	Users should refer to this section in conjunction with the detailed site assessments and mapping (Appendix A) to understand the data presented.
4. Level 2 Assessment Methodology	Summarises the sites taken forward to a Level 2 assessment and the outputs produced for each of these sites.	Users should refer to this section in conjunction with the detailed site assessments and mapping (Appendix A) to understand the data presented.
5. Flood risk management requirements for developers	Identifies the scope of the assessments that must be submitted in Flood Risk Assessments (FRAs) supporting applications for new development. Refers to relevant sections in the Level 1 SFRA for mitigation guidance.	Developers should use this section alongside the relevant sections of the Level 1 SFRA to understand requirements for FRAs, which conditions/guidance documents should be followed, and information on flood mitigation options.
6. Surface water management and SuDS	Signposts to relevant sections of the Level 1 SFRA for information on the management of surface water including types of SuDS, SuDS policy and guidance, and SuDS constraints.	Developers should use this section alongside the relevant sections of the Level 1 SFRA to understand what national, regional, and local SuDS standards are applicable.
7. Summary of Level 2 assessment and recommendations	Summarises the results and conclusions of the Level 2 assessment, and signposts to the Level 1 SFRA for planning policy recommendations.	Developers and planners should use this section to see a summary of the Level 2 assessment and understand the key messages from the detailed site assessments. Developers should refer to the Level 1 SFRA

Section	Contents	How to use
		recommendations when considering requirements for site-specific assessments.
Appendix A: Detailed site assessments and mapping	Provides a detailed summary of flood risk for sites requiring a more detailed assessment, which considers flood risk, emergency planning, climate change, broadscale assessment of possible SuDS, Exception Test requirements, and requirements for site-specific FRAs. Also provides mapping of the flood risk at each of the sites afforded a detailed site assessment. Includes depth, velocity and hazard information for surface water flood risk where available, alongside climate change risk.	Planners should use this appendix to inform the application of the Sequential and Exception Tests, as relevant. Developers should use these assessments to understand flood risk, access and escape route requirements, climate change, SuDS, and FRA requirements for site-specific assessments.
Appendix B: Amber Sites	Provides a high-level summary of flood risk for sites at lower risk with general recommendations for developers.	Planners should use this appendix to inform the application of the Sequential and Exception Tests, as relevant. Developers should use these to understand flood risk, access and escape route requirements, climate change, SuDS, and FRA requirements for site-specific assessments.
Appendix C: Level 2 sites summary	Provides a high-level summary of flood risk for sites assessed as part of the Level 2 SFRA with general recommendations for developers.	Planners should use this appendix to inform the application of the Sequential and Exception Tests, as relevant. Developers should use these to understand flood risk, access and escape route requirements, climate change, SuDS, and FRA requirements for site-specific assessments.

Section	Contents	How to use
Appendix D: Data sources used in this SFRA	Summarises the data used in the Level 2 detailed site assessments and mapping.	Users should refer to this section to understand the data used and where this data can be obtained.

2 The Planning Framework and Planning Policy for Flood Risk Management

The flood risk management roles and responsibilities for different organisations and relevant legislation, policy and strategy are detailed within Section 2 of the Milton Keynes City Council – Level 1 Strategic Flood Risk Assessment[3].

This contains details on:

- Flood risk policy and strategy
- Roles and responsibilities for Flood Risk Management in Milton Keynes
- Relevant legislation
- Relevant Flood Risk Policy and Strategy Documents
- Key legislation for flood and water management
- Key national, regional and local policy documents and strategies

The following sections summarise any changes to flood risk legislation, policy, and strategy since publication of the Level 1 SFRA.

2.1 National Planning Policy Framework

The NPPF (December 2024) (gov.uk) sets out Government's planning policies for England and how these are expected to be applied. The NPPF is based on core principles of sustainability and forms the national policy framework in England, also accompanied by a number of PPG. It must be taken into account in the preparation of local plans and is a material consideration in planning decisions.

At the time of the Level 1 SFRA, the latest version of the NPPF was the December 2023 update. The NPPF has since been updated in December 2024. Overall, the changes in relation to flood risk (Paragraphs 170 to 182) are considered to be relatively minor and strengthen ambiguity within the previous framework rather than materially changing anything and therefore no changes to the Level 1 SFRA are considered necessary.

The following points summarise the changes in the December 2024 NPPF:

- **Paragraph 173**: A new paragraph has been added with the purpose of specifying that the Sequential Test should apply to individual applications as well as plans. This was already included within the PPG and as such has been included in the NPPF for completeness.
- **Paragraph 174 (previously Paragraph 168)**: Reference to the sequential approach ('the sequential approach should be used in areas known to be at risk now or in the future from any form of flooding') has been deleted from this paragraph.
- **Paragraph 175**: A new paragraph has been added which brings across changes which were made in the Environment Agency standing advice in August. This addition clarifies under what circumstances the Sequential Test would not need

to be applied; where a site-specific FRA demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).

- **Paragraph 176**: This paragraph is largely the same as paragraph 174 in the previous version of the NPPF, but it has been moved further up the document to a more appropriate location.
- **Paragraph 177 (previously Paragraph 169)**: The start of this paragraph has been updated to include 'Having applied the sequential test' – providing more clarification that the Sequential Test needs to be applied before the Exception Test.
- **Paragraph 182 (previously Paragraph 175)**: The reference to 'Major developments' has been removed, thus applying the need for SuDS to all development. A statement on proportionality has also been included in place of 'unless there is clear evidence that this would be inappropriate'. Greater emphasis has also been placed on the multifunctional benefits.

2.2 Planning Practice Guidance

The Planning Practice Guidance (PPG) stands alongside the NPPF and was last updated in February 2024. The Flood Risk and Coastal Change guidance[10] was most recently updated in September 2025 to include updates to paragraphs 23, 27 and 28, and an addition of paragraph 27a.

2.2.1 The Sequential Test

The Sequential Test aims to ensure that areas of little or no flood risk are prioritised for development over areas at a higher risk of flooding. This means areas at a medium or high risk of flooding from any source, now or on the future should be avoided for development where possible.

It should be noted that, following the September 2025 update, the Sequential Test is no longer required for surface water where a Flood Risk Assessment demonstrates that the development will remain safe for its lifetime and will not increase flood risk elsewhere, specifically for windfall development.

2.2.2 The Exception Test

It may not always be possible for all new development to be allocated on land that is not at risk from flooding. To further inform whether land should be allocated, or planning permission granted, a greater understanding of the scale and nature of the flood risks is required. In these instances, the Exception Test will be required.

10 https://www.gov.uk/guidance/flood-risk-and-coastal-change

The Exception Test should only be applied following the application of the Sequential Test. It applies in the following instances, where it is not possible for development to be located in areas with a lower risk of flooding:

- Development classified as 'More vulnerable' in Flood Zone 3a
- Development classified as 'Essential infrastructure' in Flood Zone 3a or 3b
- Development classified as 'Highly vulnerable' in Flood Zone 2 (this is NOT permitted in Flood Zone 3a or 3b)
- Details of Flood risk vulnerability classifications can be found in Annex 3 of the NPPF[11].

2.3 Use of SFRA data

This SFRA has been developed using the best available information, supplied at the time of preparation. This relates both to the current risk of flooding from rivers, the sea, surface water and groundwater and, where available, the potential effects of future climate change.

Datasets used to inform this SFRA may be updated following the publication of this SFRA and new information on flood risk may be produced by Risk Management Authorities. This new information (such as updated mapping and modelling) may supersede the information included in this SFRA. Guidance should be sought from Milton Keynes City Council and the Environment Agency as appropriate to check that the most up to date information is used for future flood risk assessments.

11 National Planning Policy Framework - Annex 3: Flood risk vulnerability classification - Guidance - GOV.UK

3 Level 2 Strategic Flood Risk Assessment

This section outlines the datasets used in assessing the Local Plan proposed development sites in the Level 2 SFRA Appendix A.

It should be noted that datasets used to inform this SFRA may be updated following the publication of this SFRA and new information on flood risk may be produced by RMAs. Guidance should be sought from Milton Keynes City Council and the Environment Agency as appropriate to check the most up to date source of information is used for future flood risk assessment.

Appendix C provides an overview of the supplied data used to inform the appraisal of flood risk for Milton Keynes including when the data was provided, the source of the data, and how the data can be obtained by a developer if applicable.

3.1 Historic flooding

The Environment Agency's 'Recorded Flood Outlines' dataset has been used to understand whether historic flooding has been recorded at the sites. This dataset takes into account the presence of defences, structures, and other infrastructure where they existed at the time of flooding. Additionally, Milton Keynes City Council Section 19 Reports and the Level 1 report were used to inform areas of additional historic flooding.

It is important to note that the absence of historic flood records does not mean that an area has never flooded, only that records are not held. For previously undeveloped sites, it is likely that historic flooding incidents may have gone unreported due to a lack of site use or interest. In addition, it is also possible that flooding mechanisms have changed since the date of a recorded flooding incident, making it more or less likely for flooding to occur on site.

3.2 River networks

Main Rivers are represented by the Environment Agency 's Statutory Main River layer. Ordinary Watercourses are represented by the OS Open Rivers dataset. Caution should be taken when using these layers to identify culverted watercourses which may appear as straight lines but, in reality, are not.

3.3 Fluvial flooding

Since the publication of the Level 1 SFRA report, the Flood Map for Planning was updated (on 25 March 2025) as part of the new National Flood Risk Assessment (NaFRA2). This included new and updated flood zones. As a result, as part of the Level 2 Site Screening both the old and the new Flood Zones were assessed for each of the sites for comparison.

However, it should be noted that only the most recent Flood Zones (updated November 2025) at the time of producing the SFRA have been used within the site sheets.

Only two sites within the Level 2 assessment were identified to be within an area at risk of fluvial climate change flooding, and neither were taken forwards within a Level 2 site sheet due to the size of the developable area of the site and location of flooding. These sites are discussed within Appendix B as an 'Amber Site'. Please see Section 4 for more information on how sites were taken forwards.

The Environment Agency is in the process of updating the modelling of the River Great Ouse, but this was not available in the timescales of the SFRA. Guidance should be sought from Milton Keynes City Council and the Environment Agency as appropriate to check the most up to date source of information is used for future flood risk assessment.

3.4 Flood defences

For sites where existing flood defences provide a reduction in the flood risk to the site, it is important to understand the standard of protection these structures and measures provide. It is also necessary to understand how this level of protection changes over time, considering the implications of climate change.

Current flood defence data has been taken from the Environment Agency's Asset Information Management System (AIMS) Spatial Defences data set.

3.5 Surface water flooding

Mapping of surface water flood risk in Milton Keynes has been taken from the Environment Agency's Risk of Flooding from Surface Water (RoFSW) mapping updated in March 2025 as part of NaFRA2. It should be noted that both the current RoFSW dataset and the superseded data (available prior to March 2025) have been discussed within this assessment. The superseded data (pre March 2025) has been considered due to the availability of specific depth, hazard and velocity information, which is not available in the most recent banded dataset. A comparison between the two surface water dataset extents has been undertaken.

The superseded dataset should not be relied upon to inform site specific flood risk assessments and developers should consult with Milton Keynes City Council and the Environment Agency at an early stage to discuss flood risk including requirements for site-specific FRAs.

As defined within the dataset available prior to March 2025 the surface water flood risk is subdivided into the following four categories:

- **High**: An area has a chance of flooding greater than 3.3% AEP (1 in 30-year) each year.
- **Medium**: An area has a chance of flooding between 1% AEP (1 in 100-year) and 3.3% AEP (1 in 30-year) each year.
- **Low**: An area has a chance of flooding between 0.1% AEP (1 in 1,000-year) and 1% AEP (1 in 100-year) each year.
- **Very Low**: An area has a chance of flooding of less than 0.1% AEP (1 in 1,000-year) each year.

The results should be used for high-level assessments. If a particular site is indicated in the Environment Agency mapping to be at risk from surface water flooding, a more detailed assessment would be required to illustrate the flood risk more accurately at a site-specific scale. Such an assessment should use the RoFSW in partnership with other sources of local flooding information to confirm the presence of a surface water risk at that particular location.

3.6 Climate change

Climate change mapping is shown in the mapping in Appendix A for surface water flooding using modelled outputs with the latest climate change uplifts where available.

As mentioned above the surface water dataset available prior to March 2025 is used within this assessment, due to the availability of specific depth, hazard and velocity information, which is not available in the most recent banded dataset.

The superseded dataset should not be relied upon to inform site specific flood risk assessments and developers should consult with Milton Keynes City Council and the Environment Agency at an early stage to discuss flood risk including requirements for site-specific FRAs.

3.6.1 Climate change allowances for peak flows

Climate change is expected to increase the peak flows of rivers, meaning that flows which were previously thought to be extreme will now be considered far more possible. Areas benefiting from flood defences will find the standard of protection changes over time with overtopping of defences more likely unless they are upgraded.

Peak river flow climate change allowances developed by the Environment Agency are divided into Management Catchments. The details of the Upper and Bedford Ouse Management Catchment are shown below in Table 3-1.

Table 3-1: Peak river flow allowances for the Upper and Bedford Ouse Management Catchment.

Allowance category	Total potential change (%) anticipated for '2020s' (2015 to 2039)	Total potential change (%) anticipated for '2050s' (2040 to 2069)	Total potential change (%) anticipated for '2080s' (2070 to 2125)
Upper end	24	30	58
Higher Central	10	11	30
Central	5	4	19

3.6.2 Climate change allowances for peak rainfall

Climate change is predicted to result in wetter winters and increased summer storm intensity in the future. This increased rainfall intensity will affect land and urban drainage systems, resulting in surface water flooding, due to the increased volume of water entering

the systems. The potential impacts of surface water plus climate change will likely need to be considered at site-specific assessment stage.

Peak rainfall climate change allowances developed by the Environment Agency are divided into Management Catchments. The details of the Upper and Bedford Ouse Management Catchment are shown below in Table 3-2.

Table 3-2: Peak rainfall intensity allowances for small and urban catchments for the Upper and Bedford Ouse Management Catchment.

Allowance category	Total potential change (%) anticipated for '2050s' (2022 to 2060) for 3.3% AEP	Total potential change (%) anticipated for '2050s' (2022 to 2060) for 1% AEP	Total potential change (%) anticipated for '2070s' (2061 to 2125) for 3.3% AEP	Total potential change (%) anticipated for '2070s' (2061 to 2125) for 1% AEP
Upper end	35	40	35	40
Central	20	20	25	25

3.7 Groundwater flooding

The JBA Groundwater Emergence map has been used to assess potential areas that are likely to be at higher risk of groundwater flooding. The JBA Groundwater Emergence map, shows the likelihood of groundwater emergence posing a risk to both surface and subsurface assets, based on predicted groundwater levels during a 1% AEP event. Surface water mapping and topographic data is used to gain an understanding of the overland flow routes which may be impacted by this emergence.

The JBA Groundwater Emergence mapping is categorised into five different classes; a detailed description of the classes is in Table 3-3 below.

Table 3-3: JBA Groundwater Emergence Map category descriptions.

Category	Potential risk
Groundwater levels are either at or very near (within 0.025m of) the ground surface.	Within this zone there is a risk of groundwater flooding to both surface and subsurface assets. Groundwater may emerge at significant rates and has the capacity to flow overland and/or pond within any topographic low spots.
Groundwater levels are between 0.025m and 0.5m below the ground surface.	Within this zone there is a risk of groundwater flooding to both surface and subsurface assets. There is the possibility of groundwater emerging at the surface locally.
Groundwater levels are between 0.5m and 5m below the ground surface.	There is a risk of flooding to subsurface assets, but surface manifestation of groundwater is unlikely.

Category	Potential risk
Groundwater levels are at least 5m below the ground surface.	Flooding from groundwater is not likely.
Low risk.	This zone is deemed as having a negligible risk from groundwater flooding due to the nature of the local geological deposits.

3.7.1 Groundwater flooding and climate change

The impact of climate change is more uncertain for groundwater flooding associated with rivers and land catchments and those watercourses where groundwater has a large influence on winter flood flows. Changes in frequency and intensity of groundwater flooding due to climate change would depend on the flooding mechanism and geological characteristics.

Milder wetter winters may increase the frequency of groundwater flooding incidents in areas that are already susceptible, but warmer drier summers may counteract this effect by drawing down groundwater levels to a greater extent during the summer months.

3.8 Reservoir flooding

The risk of inundation as a result of a breach or failure of a number of reservoirs within the area has been identified from the Environment Agency's Reservoir Flood Extents dataset (gov.uk). Although it is predicted that there is a risk to life if these reservoirs were to fail, the risk of such an event occurring is very low.

This dataset consists of flood extents for two scenarios including 'Wet Day' and 'Dry Day', for all large, raised reservoirs. The 'Dry Day' scenario shows flood extents in the event that reservoirs were to fail and release the water they hold when local rivers are at normal levels. The 'Wet Day' scenario shows flood extents in the event that reservoirs were to fail and release the water they hold when local rivers are in flood.

Flood extents are not included for smaller reservoirs or for reservoirs commissioned after the reservoir modelling programme began in October 2016. Furthermore, only those reservoirs with an impounded volume greater than 25,000 cubic metres are governed by the Reservoir Act 1975. It should be noted that only three sites were identified to be at risk of reservoir flooding within the Level 2 screening. Brickhill Street has been identified to be an 'Amber site' and is discussed in more detail in Appendix B. The other two sites were either not identified as requiring a Level 2 assessment or were not allocated.

3.9 Sewer flooding

Anglian Water are the main water company responsible for the management of the sewerage networks across Milton Keynes. There are other NAV (New Appointment and Variations) companies approved by Ofwat that provide water and/or sewerage services to specific sites instead of the usual water company responsible for the area.

As part of this assessment an Anglian Water flooding incidents dataset was used to identify sewer flooding within the area.

The 2,342 Anglian Water sewer historic flooding data points provided between 2012 to 2022 are shown to be dispersed across Milton Keynes administrative area. These are mostly from foul sewer, but there are also combined sewer and surface sewer records. Within the administrative area the majority of points are located within the southern half of the boundary in the town centre, with smaller clusters in the north in Castlethorpe, Hanslope, Ravenstone, Olney and Sherington.

Due to licencing and confidentiality restrictions, sewer data has not been represented on the mapping, but incidents within 100m of the site were referred to within the detailed site assessments.

As discussed within Section 3.2.4 of the Level 1 SFRA the Anglian Water Drainage and Wastewater Management Plan (DWMP) is not considered a suitable dataset to use as there is no mapping available that enables risk to be compared at site scale (as it is prepared at sewer catchment scale).

3.10 Residual risk

Five sites assessed within Milton Keynes are located within close proximity of raised flood defences which may present a residual risk should they breach or be overtopped. It should be noted that two of these sites (Brickhill Street and Lakes 2.3) are noted as an 'Amber Site' and discussed in more detail in Appendix B. One of the sites was detailed by MKCC as not being allocated, and the other two sites (Lakes 2.1 and Lakes 2.4) were not identified to require a Level 2 assessment. These two sites are located in close proximity to the canal and are also potentially at risk if a canal breach were to occur. The residual risk for these sites should be investigated prior to development, with consultation with the Canal and Rivers Trust.

The remainder of the sites and all of those assessed within a Level 2 site sheet were not identified to contain any residual flood risk to the site from flood risk management structures. However, residual risk may still arise from potential blockages in highway, culverts or sewer drainage infrastructure, or as a result of a canal breach. These risks have not been assessed as part of this study and should be investigated prior to development.

3.11 Canal flooding

As discussed within Section 4.8 of the Level 1 SFRA[3], there is one canal within the administrative area of Milton Keynes, the Grand Union Canal. The Canal and River Trust have two records of breaches on the Grand Union Canal in 1808 and 1971. There are also two records of overtopping of the Grand Union Canal to the west of the administrative area in South Northamptonshire, in 2007 and 2013.

The canals have the potential to interact with other watercourses in the study area, including the River Great Ouse. These have the potential to become flow paths if these canals were overtopped or breached. Any development proposed adjacent to a canal

should include a detailed assessment of how a canal breach would impact the site, as part of a site-specific Flood Risk Assessment.

3.12 Internal Drainage Board

Internal drainage boards are risk management authorities responsible for managing water levels within their internal district. They have (amongst others) the following functions to manage the risk of flooding.

- carrying out works to manage flood risk from ordinary watercourses and the sea and to manage water levels within their internal drainage district (Land Drainage Act 1991).
- consenting to certain structural changes on ordinary watercourses (Land Drainage Act 1991).

The Milton Keynes administrative area is located within the Buckingham and River Ouzel Internal Drainage Board district as part of the larger Bedford Group of Drainage Boards.

3.13 Critical Drainage Catchments

Milton Keynes Surface Water Management Plan (2016) identified 13 Critical Drainage Catchments (CDCs), through an initial risk assessment, which represent areas or catchments across the administrative area of Milton Keynes at greatest risk of surface water flooding. Details of the CDC's are included within the individual site sheets. Where development is within a Critical Drainage Catchment specific policy requirements should be considered prior to development.

In Critical Drainage Catchments, a Flood Risk Assessment is required to demonstrate that the development will not increase the flood risk to the Critical Drainage Catchment, and where possible will provide an improvement to the existing situation.

3.14 Cumulative Impact Assessment

When allocating land for development, consideration should be given to the potential cumulative impact of the loss of floodplain storage volume and potential effects of increased volumes of runoff from proposed development. Whilst the loss of storage or potential increase in flow volume for individual developments may only have minimal impact on flood risk, the cumulative effect of multiple developments may be more severe.

As part of the Level 1 Assessment a cumulative impact assessment was carried out and identified which catchments within the Milton Keynes administrative area are more sensitive to the cumulative impact of development and where more stringent policy regarding flood risk is recommended. Any development in these areas should seek to contribute to work that reduces wider flood risk in those catchments. This exercise has not been repeated as part of the Level 2 SFRA.

The Cumulative Impact Assessment ranking from the Level 1 SFRA has been included in each site sheet for the Level 2 SFRA sites.

3.15 Depth, velocity, and hazard to people

The Level 2 assessment seeks to map the probable depth and velocity of flooding as well as the hazard to people and use this within the detailed site assessments.

The surface water present day and climate change depth, hazard and velocity data has been used and discussed within each site sheet.

Hazard to people has been calculated using the below formula as suggested in Defra's Supplementary note on flood hazard ratings and thresholds for development planning and control purpose (gov.uk). The different hazard categories are shown in Table 3-4. Developers should also test the impact of climate change depths, velocities, and hazard on the site, as part of the site-specific FRA.

Table 3-4: Defra's 'Flood Risks to People' classifications

Description of Flood Hazard Rating	Flood Hazard Rating	Classification Explanation
Very Low Hazard/ Caution	<0.75	'Flood zone with shallow flowing water or deep standing water'
Danger For Some (i.e. children)	0.75 - 1.25	'Danger: flood zone with deep or fast flowing water'
Danger For Most	1.25 - 2.00	'Danger: flood zone with deep fast flowing water'
Danger For All	>2.00	'Extreme danger: flood zone with deep fast flowing water'

3.16 SuDS suitability

The hydraulic and geological characteristics of each site have been assessed to determine the factors that potentially constrain schemes for surface water management. This assessment is designed to inform the early-stage site planning process and is not intended to replace site-specific detailed drainage assessments. A high-level assessment of suitability of SuDS is included in the site assessments in Appendix A.

The assessment is based on catchment characteristics using the following data:

- Environment Agency 1m LiDAR
- The British Geological Survey website (bgs.ac.uk) geology and soils mapping
- JBA Groundwater Emergence Mapping (see Section 3.7 for further details)
- Historic landfill sites
- Groundwater Source Protection Zones
- Nitrate Vulnerable Zones
- Main Rivers
- RoFSW mapping
- Flood Zones (see Section 3.3 for further details)

This data was then collated to provide an indication of particular groups of SuDS systems which might be suitable at a site. SuDS techniques were categorised into five main groups, as shown in Table 3-5.

Table 3-5: Summary of SuDS categories

SuDS Type	Technique
Source Controls	Green Roof, Rainwater Harvesting, Rain Gardens
Infiltration	Infiltration Trench, Infiltration Basin, Soakaway, Pervious Pavements
Detention	Pond, Wetland, Subsurface Storage, Shallow Wetland, Extended Detention Wetland, Pocket Wetland, Submerged Gravel Wetland, Wetland Channel, Detention Basin
Filtration	Surface Sand Filter, Sub-Surface Sand Filter, Perimeter Sand Filter, Bioretention, Filter Strip, Filter Trench
Conveyance	Dry Swale, Under-drained Swale, Wet Swale

The suitability of SuDS have been described within the detailed site assessments, where applicable. The assessment of suitability is broadscale and indicative only; more detailed assessments should be carried out during the site planning stage to confirm the feasibility of different types of SuDS.

SuDS in the plan area should be designed in accordance with the following documents:

- National standards for sustainable drainage systems (SuDS)
- Milton Keynes Surface Water Drainage Guidance for Developers
- Anglian Water's Surface Water Drainage Policy

3.17 Emergency Planning

Flood Warning Areas (FWAs) and Flood Alert Areas (FAAs) are detailed in the Environment Agency 's GIS datasets and can be used to inform emergency planning. FAAs inform the Environment Agency when there is flooding first in the catchment, irrespective of properties, hence this coverage tends to apply to whole watercourses or stretch of coastline. FWAs are derived from the extreme flood outline (0.1% AEP event), focussed on communities, properties, and/or infrastructure. Modelled depth, velocity and hazard data can be used to understand safe access and escape routes for each site.

4 Level 2 Assessment Methodology

This section outlines how sites were screened against flood risk datasets to determine which sites required a Level 2 detailed site assessment. It also identifies other sites, referred to in this SFRA as 'amber sites', at lower risk with general recommendations for developers.

4.1 Site screening

Milton Keynes City Council provided 84 sites for assessment. These sites were screened using an 'overlap analysis' tool in GIS. This analysed various flood risk datasets against the site allocations layer and calculated the percentage cover for each flood risk dataset against each site. This was used to provide a summary of risk to each site, including:

- the proportion of the site in each Flood Zone derived from detailed hydraulic model outputs where available, and where detailed modelling was unavailable the information is taken from the Environment Agency 's NaFRA2 FMfP (see Section 3.2 for a summary of how the Flood Zones were derived for this SFRA). It should be noted that both the superseded and recently released flood zone datasets were assessed as part of the site screening process.
- Whether the site is shown to be at fluvial flood risk from the 2%, 1% and 0.1% AEP plus 19% and 30% climate change scenarios from detailed modelling.
- whether the site is shown to be at risk from surface water flooding in the RoFSW mapping for the 3.3%, 1%, and 0.1% AEP events, and the 3.3% AEP plus 35% and 1% AEP plus 40% climate change scenarios. It should be noted that both the superseded and recently released NaFRa2 datasets were assessed as part of the site screening process.
- whether the site is within, or partially within, the reservoir 'Dry Day' or 'Wet Day' flood extents.
- whether the site is within, or partially within, the Environment Agency 's Recorded Flood Outlines dataset.
- whether the site is within 100m of watercourses shown within the Main Rivers and Ordinary Watercourses datasets.
- whether the site is located within the top two highest risk categories of groundwater emergence using the JBA Groundwater Emergence Map.
- Whether the site is located within a Critical Drainage Catchment.

The results of the screening provide a quick and efficient way of identifying sites that are likely to require a Level 2 assessment, assisting Milton Keynes City Council with Sequential Test decision-making so that flood risk is taken into account when considering allocation options.

The screening also provides an opportunity to identify sites which may show to be 100% in Flood Zone 1, but upon visual inspection in GIS, have an ordinary watercourse flowing through or adjacent to them. Although there are no Flood Zone maps available for these

watercourses, it does not mean the watercourse does not pose a risk, it just means no modelling has yet been undertaken to identify the risk.

Flood Zones are not provided for specific sites or land where the catchment of the watercourse falls below 3km². For this reason, the Flood Zones are not of a resolution to be used as application evidence to provide the details of possible flooding for individual properties or sites and for any sites with watercourses on, or adjacent to the site. The RoFSW has been used to assess flood risk in these cases because it is comparable to fluvial flooding from smaller watercourses and is therefore a reasonable representation of the floodplain of such watercourses to use for a strategic assessment.

4.2 Sites taken forward to a Level 2 assessment

Milton Keynes City Council provided the net developable area for each site. This has been used to inform which sites need to go forwards to a Level 2 assessment.

In cases where the proportion of the site at risk of flooding is smaller than the proposed non developed area of a site, a sequential approach at the site level would be appropriate and enable development to be placed in locations at low risk of flooding (by avoiding high risk areas that might exist at a particular site).

A spreadsheet was formulated taking into account the 84 sites assessing their flood risk from fluvial and surface water flooding extents. Sites were taken forward based on the percentage of flooding within the datasets list above in Section 4.1, within each sites developable area.

Sites have been flagged as potentially needing a Level 2 assessment where more than 5% of the net developable area of the site is at risk of flooding.

Sites were grouped into three categories depending on the nature of the flood risk:

- Red – Level 2 assessment needed
- Amber – Individual Level 2 assessment not required but recommendations for sites to be provided in Main Level 2 Report
- Green – Individual Level 2 assessment not required

Out of the 84 sites, 32 sites were identified as potentially needing a Level 2 assessment. A further 12 sites were identified as an amber site, due to their surface water flood risk.

Consideration was also given to each site to identify any site-specific information; for example, where detailed modelling is needed, or if the RoFSW dataset can be used to assess flood risk.

Following a discussion with Milton Keynes City Council eleven sites were then removed as the sites will not be allocated in the new Local Plan or have resolution to grant planning permission:

- Caldecotte Site C
- MRTCoffee6.1
- MRTCoffee6.2

- MRTLakes2.2
- MRTNeth5.1
- MRTNeth5.2
- MRTTatt9.1
- MRTWolv17.1
- Land between Sark Drive and Furzey Way Newton Leys (recent resolution to grant planning permission)
- Land north of Furzey Way Newton Leys (recent resolution to grant planning permission)
- Hockliffe Brae

Milton Keynes City Council have requested that Campbell Park G4.3, G4.1 and G4.2 are combined and assessed as one site, and that F1.2, F1.3 and F1.4 are combined and assessed as one site.

Therefore, out of the 84 sites provided by Milton Keynes City Council, 17 sites have been identified to be carried forward to a Level 2 assessment. These sites are summarised within Appendix C.

- Brunel Centre, Bletchley
- Buckingham House
- Campbell Park G4.3, G4.1, G4.2
- CMK
- F1.2, F1.3, F1.4
- F4.4
- Former Police & Fire Stations
- Former Sainsburys site
- H1.1
- Isaacson Drive
- Land at Bergamot Gardens
- Parcel 3 - Open University
- Powis Lane
- Singleton Drive
- Wadhurst Lane
- West of Vernier Crescent
- Wolverton Works

4.3 Detailed site assessments

As part of the Level 2 SFRA, detailed site assessments have been produced for the 17 sites identified in Section 4.2. The site assessments with the mapping can be found in Appendix A. Table 4-1 sets out the information contained within each section of the site assessment.

Table 4-1: Summary of the information within each section of the detailed site assessments.

Section	Information
1. Background	• Location of the site • Area, current land use (greenfield/brownfield), proposed site use • Topography of the site • Geology and soil characteristics
2. Sources of flood risk	• Location of the site within the catchment • Existing drainage features • Fluvial – proportion of site at risk including description from mapping/modelling, utilising depth, hazard, and velocity information from detailed hydraulic models where available • Surface Water – proportion of site at risk including description from RoFSW mapping using available depth, hazard, and velocity information • Reservoir flood risk in both the 'Dry Day' and 'Wet Day' scenarios • Groundwater emergence risk • Canal flood risk • Sewer flood risk - reported incidences within the site and any additional known risks identified by Anglian Water • Flood history - historic incidents on or surrounding the site from the Environment Agency Recorded Flood Outline dataset and Section 19 Reports • Critical Drainage Catchment identification
3. Climate Change	• Fluvial climate change risk • Surface water climate change - summary of available climate change allowances and increase in flood extent compared to the 1% AEP event
4. Flood risk management infrastructure	• Flood risk management infrastructure • Description of residual risk
5. Emergency planning	• Flood warnings and alerts • Existing emergency plans and procedures • Access and escape routes • Dry islands
6. Requirements for drainage control and impact mitigation	• Broadscale assessment of possible SuDS to provide indicative surface water drainage advice for each site assessed for the Level 2 SFRA • Identification of potential SuDS constraints including Groundwater Source Protection Zones, Nitrate Vulnerable Zones and historic landfill sites

Section	Information
7. NPPF and planning implications	• Exception Test requirements • Requirements and guidance for site-specific Flood Risk Assessment • Guidance for site design and making development safe
8. Conclusions	• Summary of key risks to the site • Summarising considerations if development proceeds

4.4 Amber sites assessment

As set out in Section 4.2, 12 sites that are being taken forward by Milton Keynes City Council were identified as 'amber sites' based on the surface water risk on or surrounding the site, reservoir, fluvial and/or groundwater emergence potential at the site. Amber sites were sites where less than 5% of the net developable area of the site is at risk of flooding based on the datasets listed in Section 4.1.

Appendix B provides a more detailed overview of the flood risk at the identified 'amber sites' and general recommendations that should be applied to any future development at these sites.

5 Flood risk management requirements for developers

The flood risk management requirements for developers are detailed within Milton Keynes City Council – Level 1 Strategic Flood Risk Assessment[3] (Section 8). Users should refer to this section for guidance on site-specific FRAs and other principles for managing flood risk in new development.

This contains details on:

- early consultation with statutory and non-statutory consultees;
- requirements for site-specific FRAs, including signposting to specific guidance; and
- emergency planning.

Any FRA should be carried out in line with latest guidance including the NPPF, Flood Risk and Coastal Change PPG, and Milton Keynes Local Plan Policies. Developers should refer to flood risk policies CEA13, CEA14 and CEA15 in the Milton Keynes City Plan 2050.

The sections below contain further information on emergency planning and the requirements for developer contributions.

5.1 Emergency planning

Safe access and escape routes from the site should be provided. The developer should seek to incorporate an emergency plan and a safe refuge point if the development site has been identified to be at risk of flooding. The local authority and Emergency Services should be consulted when designing an emergency plan.

This Level 2 assessment has identified none of the proposed 17 development sites to be located within existing Environment Agency FWAs and/or FAAs.

Section 8.6 of the Level 1 SFRA report discusses NPPF requirements and what an emergency plan will need to consider and other relevant information on emergency planning. Further information is provided on the Milton Keynes Emergency Planning webpage[12].

The duration and onset of flooding affecting a site depends on several factors:

- Location of the site within the catchment: flooding is likely to be rapid and flashy in the upper catchment (e.g. small tributaries) and slower responding and longer in duration in the lower catchment.
- Upstream storage: floodplains, reservoirs, and other storage areas upstream of a site may provide some online flood storage that reduces the flood risk downstream and delays the onset of flooding.

12 https://www.milton-keynes.gov.uk/emergency-planning

- Timing of peak flow: at the confluence of the larger watercourses and smaller tributaries, there may be different timings of peak flows, for example smaller tributaries would peak much earlier than the larger catchments.
- The principal source of flooding: where this is surface water, depending on the intensity and location of the rainfall, flooding could be experienced within 30 minutes of the heavy rainfall event e.g., a thunderstorm. Typically, the duration of flooding for areas at risk of surface water flooding, or from flash flooding from small watercourses, is short (hours rather than days).
- The preceding weather conditions prior to the flooding: wet weather lasting several weeks will lead to saturated ground. Rivers respond much quicker to rainfall in these conditions.
- Whether a site is defended, noting that if the defences were to fail, a site could be affected by very fast flowing and hazardous water within 15 minutes of a breach developing (depending on the size of the breach and the location of the site in relation to the breach), causing danger to life.
- Catchment geology: the permeability of a catchment affects its response time, for example chalk catchments take longer to respond than clay catchments.

5.2 Developer contributions

In some cases, and following the application of the Sequential Test, it may be appropriate for the developer to contribute to the improvement of flood defence provision that would benefit both proposed new development and the existing local community. Developer contributions should include the following:

- Developers should check the online Flood Map for Planning (gov.uk) in the first instance to identify any major changes to the Flood Zones and the long-term flood risk mapping portal (gov.uk) for any changes to flood risk from surface water or inundation from reservoirs.
- Developer contributions can be made to maintenance and provision of flood risk management assets, flood warning and the reduction of surface water flooding (i.e. SuDS).
- Developers should also confirm that a development will not impact upon the ability of a floodplain to store or convey and seek opportunities to provide floodplain betterment, should the footprint of a development change.
- Where necessary, compensatory flood storage should be provided up to the 1% AEP plus climate change flood level and adjacent to the floodplain so that the flood storage can hydraulically fill and drain.
- Developers must be aware that that information within the Level 1 and Level 2 SFRAs will be a useful starting point for development considerations, however they must request the most recent data and update hydraulic modelling where required. The Environment Agency are due to publish a new national risk information for flooding and coastal erosion, this will include future scenarios accounting for climate change. Once this information is available, it should be

used as the main source of flood risk information, unless site-specific modelling / information is available.

The council should only use planning obligations to secure contributions where it is satisfied that the contribution will fund works / measures which are:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development (Paragraph 57, NPPF).

6 Surface water management and SuDS

The Surface Water Management roles and responsibilities for different organisations and relevant legislation, policy and strategy are detailed within the Milton Keynes City Council – Level 1 Strategic Flood Risk Assessment[3] (Section 9). Users should refer to this section when considering the different sources of flood risk to the site and how this can be mitigated in a sustainable way.

This contains detail on:

- role of the LLFA and LPA in surface water management;
- types of SuDS;
- sources of SuDS guidance; and,
- other surface water considerations including Groundwater Vulnerability Zones (GVZs), Groundwater Source Protection Zones (GSPZs), and Nitrate Vulnerability Zones (NVZs).

6.1 Updated SuDs guidance

Since publication of the Level 1 SFRA, the Defra National standards for sustainable drainage systems (SuDS) (gov.uk) were published in June 2025.

Previously SuDS guidance was developed to sit alongside the PPG and provide non-statutory standards as to the expected design and performance for SuDS. The new national remain as a non-statutory specification but form a material consideration for LPAs when assessing planning applications. These standards aim to reflect and reinforce good practice and use of SuDS, reflecting the four pillars of SuDS design.

The national standards contain two sets of standards. The first type (Standard 1) is known as the hierarchy standard and gives criteria for the prioritisation of final runoff destinations. The other standards (Standards 2-7) detail the minimum requirements of design criteria that surface water drainage systems should satisfy alongside how they are to be appropriately built, maintained, and operated.

As stated within the Level 1 SFRA, Milton Keynes Council has published specific guidance on the preparation of surface water drainage strategies[13]. This provides information on the level of detail we require depending on the type of planning application. The document should be used by all developers and their consultants who wish to submit an application within Milton Keynes administrative area. Developers should also refer to Milton Keynes City Council Planning Application Validation Requirements[14].

13 https://www.milton-keynes.gov.uk/flood-and-water-management/flood-risk-guidance-developers
14 https://www.milton-keynes.gov.uk/sites/default/files/2023-03/MKC%20Planning%20Application%20Validation%20Requirements%20v2.3%20ADOPTED.pdf

7 Summary of Level 2 assessment and recommendations

7.1 Considering the Exception Test for the proposed development sites

The 17 sites taken forwards for a Level 2 assessment were not identified to require the Exception Test.

However, when required, to pass the Exception Test it must be shown that the development will provide wider sustainability benefits that outweigh the risk, and that the development will be safe throughout its lifetime without increasing risk elsewhere. The former is a planning-related consideration and the Level 2 SFRA helps to answer the latter part of the Test.

In principle all of the sites assessed within this Level 2 SFRA are likely to pass the flood risk element of the Exception Text by:

- Undertaking a sequential approach to site planning so development is steered away from areas within the site at the highest risk.
- Considering safe access/escape routes in the event of a flood (from all parts of the site, if say the site is severed by a flood flow path). If access and escape are affected, a Flood Response Plan may be required.
- Designing buildings with finished floor levels above the estimated flood level (surface water 1% AEP event with an allowance for climate change), including an allowance for freeboard.
- Using areas in Flood Zone 2 for the least vulnerable parts of the development in accordance with Table 2 in the PPG. No development should be permitted in Flood Zone 3b (aside from Essential Infrastructure).
- Considering space for green infrastructure in the areas of highest flood risk.

For sites not at risk of fluvial flooding, but at risk of surface water flooding, a site-specific Flood Risk Assessment will still be required to demonstrate that the development can be made safe for its lifetime without impacting on flood risk elsewhere.

If a site is split in future into smaller land parcels for development, and some of those parcels are in areas of flood risk, the Exception Test may need to be re-applied by the developer at the planning application stage.

7.2 Recommendations from the Level 1 SFRA

Recommendations from this report should be considered in addition to recommendations from the Level 1 SFRA, which still stand for the site allocations and any windfall development that comes forward. The recommendations for the Level 1 SFRA[3] are set out in Section 13.

7.3 Requirements for developers

The sections below set out requirements for developers to consider both for developing sites assessed within this Level 2 SFRA and for developing windfall sites.

7.3.1 Watercourses

To ensure an adequate undeveloped buffer zone, development proposals must maintain a minimum set back of eight metres from any main river and at least nine metres from all other ordinary watercourses, or a distance otherwise agreed with the Environment Agency, Lead Local Flood Authority, or Internal Drainage Board as the appropriate authority. The provided buffer strip should not form part of private gardens.

This may introduce constraints regarding what development will be possible and consideration will also need to be given for access and maintenance at locations where there are culverts. Developers will be required to apply for appropriate permits so the activity being carried out over easements does not increase flood risk. Further information relating to this can be viewed on the government website Flood risk activities: environmental permits (gov.uk).

Where no recent detailed hydraulic modelling is present, it is recommended that developers construct new, or update existing, detailed hydraulic models at these sites as part of a site-specific FRA using channel, structure, and topographic survey to confirm flood risk. Site-specific flood modelling will likely need to be developed in locations where it is necessary to understand the effects of proposed development schemes on the existing flood flow paths and flood volume storage, in the present day and in the future.

At the planning application stage, developers may need to undertake more detailed hydrological and hydraulic assessments of unmodelled watercourses and surface water interactions so that the potential effects of proposals can be evaluated at site level and ensure that there is no increase in risk off-site as a result of development. The modelling should evidence flood extents, depths, velocities and hazard (including latest climate change allowances), inform development zoning within the site and prove, if required, whether the Exception Test can be passed.

If an ordinary watercourse is within or immediately adjacent to the site area, consultation with Milton Keynes City Council as the LLFA should be undertaken. If alterations or discharges are proposed to the watercourse, a land drainage consent will be required.

Developers should be aware of the need to identify the route of, and flood risk associated with, any culverts within a site. CCTV condition survey will be required to establish the current condition of the culvert and hydraulic assessments will be necessary to establish culvert capacity of both culverts on site and those immediately offsite that could pose a risk to the site. The risk of flooding should be established using site survey, including the residual risk of culvert blockage.

7.3.2 Flood risk management infrastructure and residual risk

For sites where existing flood defences provide a reduction in the flood risk to the site, it is important to understand the standard of protection these structures and measures provide. It is also necessary to understand how this level of protection changes over time, considering the implications of climate change.

If flood defences are required to protect a development site, evidence will be required to show that the new development does not adversely impact and increase flood risk to other areas, for example that there is no net loss in floodplain storage in circumstances where this is a material consideration. It will need to be established that these defences can be appropriately managed and maintained during the lifetime of the development. In some cases, it will be a requirement to demonstrate that there is an appropriate level of commitment to the maintenance of the standard of protection afforded by existing defences, where reliance is placed on the standard they provide.

Any development proposed adjacent to a canal should include a detailed assessment of how a canal breach would impact the site, as part of a site-specific FRA. The Canal and River Trust (canalrivertrust.org.uk) provide guidance on development near canals.

7.3.3 Access and escape routes

Access and escape routes should be considered at the site, but also in the vicinity of the site, for example, a site may have low surface water risk, but in the immediate locality, access/escape routes to and from the site could be restricted for vehicles and/or people. For sites assessed within this Level 2 SFRA, an initial overview of potential access and escape options is provided within the detailed site assessments and potential constraints identified.

7.3.4 Surface water flood risk and SuDS

Surface water risk should be considered in terms of the proportion of the site at risk in the 3.3%, 1% and 0.1% AEP events (with an appropriate allowance for climate change), whether the risk is due to isolated minor ponding or deeper pooling of water, or whether the risk is due to a wider overland flow route.

A strategic assessment of SuDS options has been undertaken using regional datasets for sites assessed within this Level 2 SFRA. A detailed site-specific assessment of suitable SuDS techniques should be undertaken at site-specific level to understand which SuDS options are most appropriate. This may need to include infiltration testing to determine the suitability of infiltration methods.

Surface water risk and mitigation should be considered as part of a detailed site-specific FRA and surface water drainage strategy.

7.4 Use of SFRA data and future updates

It is important to recognise that the SFRA has been developed using the best available information at the time of preparation. This relates both to the current risk of flooding from all sources and the potential impacts of future climate change.

The SFRA should be a 'living document', and as a result should be updated when new information on flood risk, flood warning, or new planning guidance or legislation becomes available. New information may be provided by Milton Keynes City Council as LLFA, the Environment Agency, and Anglian Water. Such information may be in the form of:

- New hydraulic modelling results.
- Flood event information following a future flood event.
- Policy or legislation updates.
- Updates to the Environment Agency flood mapping.
- New flood defence schemes or flood alleviation schemes.

The Environment Agency regularly reviews their flood risk mapping, and it is important that they are approached to determine whether updated information is available prior to commencing a detailed FRA.

It is recommended that the SFRA is reviewed in line with the Environment Agency's Flood Zone map updates to ensure latest data is still represented in the SFRA, allowing a cycle of review and a review of any updated data by checking with the above bodies for any new information. Users should therefore use the most appropriate and up to date available information.

Appendices

A Detailed site assessments and mapping

B Amber Sites

The following sites were identified as Amber sites (see Section 4 for details on how Amber sites were identified) and general recommendations that should be applied to any future development at these sites is provided below. This is a high-level summary only. The flood risk management requirements for developers are detailed within Milton Keynes City Council – Level 1 Strategic Flood Risk Assessment[3] (Section 8). Users should refer to this section for guidance on site-specific FRAs and other principles for managing flood risk in new development. Developers should also refer to Section 5 and 7 of the Level 2 SFRA.

Guidance should be sought from Milton Keynes City Council and the Environment Agency as appropriate to check that the most up to date information is used for future flood risk assessments.

Any FRA should be carried out in line with latest guidance including the National Planning Policy Framework (NPPF), Flood Risk and Coastal Change Planning Practice Guidance (PPG), and Milton Keynes Local Plan Policies. Developers should refer to flood risk policies CEA13, CEA14 and CEA15 in the Milton Keynes City Plan 2050.

Developers should refer to the Level 1 SFRA for mapping for Amber sites, alongside the Flood Map for Planning (gov.uk) and long-term flood risk mapping portal (gov.uk).

For sites where only a small proportion of the site is identified as being at high or medium risk of flooding it may be possible for the Sequential Test to be satisfied if all proposed development can be placed in areas of low flood risk.

Site Name	Comments
Brickhill Street	The site is identified to be primarily located within Flood Zone 1, with approximately 0.5% located within Flood Zone 2 and 0.2% in Flood Zone 3. The site is identified to be located within an area at risk of fluvial flooding with approximately 1% flooding during the 0.1% AEP plus 30% climate change scenario, due to the location of the River Ouzel along the western site boundary. The AIMS layer shows natural high ground in this location with a 50% AEP (1 in 2-year) standard of protection. Due to the proximity of the River Ouzel to the site the residual risk should be considered as part of a site-specific FRA. The site is also shown to be at risk of surface water flooding with up to 17% within the 0.1% AEP event. Up to 16% is shown to be at risk of flooding during the 1% AEP plus Climate Change event. Less than 4% of the site is also shown to be at risk of reservoir flooding during a 'Dry Day', and 70% during a

Site Name	Comments
	'Wet Day' as a result of Caldecotte Lake. The risk of reservoir flooding will need to be considered prior to development and it may be required to produce a Flood Response Plan in line with ADEPT Guidance. This should consider the duration and onset of flooding. Access and escape are likely unavailable during the 1% AEP plus climate change event. Therefore, access and escape will need to be confirmed as part of a site-specific Flood Risk Assessment and a Flood Response Plan may be required, considering the duration and onset of flooding. As only 75% of the site has been considered as a developable area a sequential approach at the site level would be appropriate and enable development to be placed in locations at low risk of flooding (by avoiding high risk areas that might exist at a particular site). Development should therefore be situated within Flood Zone 1 and steered towards areas at lowest risk of surface water flooding. A site-specific Flood Risk Assessment will be required to demonstrate that the development can be made safe for its lifetime without impacting on flood risk elsewhere.

Site Name	Comments
Byrd Crescent	The site is shown to be located within Flood Zone 1 of the Flood Map for Planning. The site is shown to be at risk of surface water flooding with a 6% coverage during the 0.1% AEP event. During the 1% AEP plus climate change event less than 1% is shown to be at risk. Access and escape are likely unavailable during the 1% AEP plus climate change event. Therefore, access and escape will need to be confirmed as part of a site-specific Flood Risk Assessment and a Flood Response Plan may be required. The site is located within a Critical Drainage Catchment therefore specific policy requirements should be considered prior to development. The developable area of the site is identified to be 100%, and therefore development should be steered towards areas at lowest risk of surface water flooding. A site-specific Flood Risk Assessment will be required to demonstrate that the development can be made safe for its lifetime without impacting on flood risk elsewhere.
Holborn Crescent	The site is shown to be located within Flood Zone 1 of the Flood Map for Planning. The site is shown to be at risk of surface water flooding with a 11% coverage during the 0.1% AEP event. During the 1% AEP plus climate change event 9% is shown to be at risk. Access and escape are likely available in the 1% AEP plus climate change event. The developable area of the site is identified to be 100%, and therefore development should be steered towards areas at lowest risk of surface water flooding. A site-specific Flood Risk Assessment will be required to demonstrate that the development can be made safe for its lifetime without impacting on flood risk elsewhere.

Site Name	Comments
Land at Weston Road, Olney	The site is identified to be primarily located within Flood Zone 1, with approximately 0.7% located within Flood Zone 2 and 4.4% in Flood Zone 3. The residual risk should be considered as part of a site-specific FRA. The site is also shown to be at risk of surface water flooding during the 1% AEP plus Climate Change event with up to 10%. The site is not at risk of flooding during the present day events. The site is also at risk of groundwater flooding with approximately 15% of the site within the two highest risk categories of groundwater emergence during a 1% AEP event. Access and escape are likely available in the 1% AEP plus climate change event. Development should be situated within Flood Zone 1, outside of the area at risk of fluvial flooding, and steered towards areas at lowest risk of surface water and groundwater flooding. A site-specific Flood Risk Assessment will be required to demonstrate that the development can be made safe for its lifetime without impacting on flood risk elsewhere.
Land to north of Caldecotte Lake Drive	The site is shown to be located within Flood Zone 1 of the Flood Map for Planning. The site is shown to be at risk of surface water flooding with a 10% coverage during the 0.1% AEP event. During the 1% AEP plus climate change event 5% is shown to be at risk. The site has been identified to be located within the Environment Agency's Recorded Flood Outlines dataset. The site is also at risk of groundwater flooding with approximately 1% of the site at highest risk of groundwater emergence during a 1% AEP event. Access and escape are likely unavailable during the 1% AEP plus climate change event. Therefore, access and escape will need to be confirmed as part of a site-specific Flood Risk Assessment and a Flood Response Plan may be required.

Site Name	Comments
	The developable area of the site is identified to be 100%, and therefore development should be steered towards areas at lowest risk of surface water and groundwater flooding. A site-specific Flood Risk Assessment will be required to demonstrate that the development can be made safe for its lifetime without impacting on flood risk elsewhere.
Lichfield Down	The site is identified to be primarily located within Flood Zone 1, with approximately 0.6% located within Flood Zone 2. Residual risk should be considered as part of a site-specific FRA. The site is also shown to be at risk of surface water flooding with up to 9% within the 0.1% AEP event. Up to 3% is shown to be at risk of flooding during the 1% AEP plus Climate Change event. The site is located within a Critical Drainage Catchment therefore specific policy requirements should be considered prior to development. The site is also at risk of groundwater flooding with approximately 62% of the site within the two highest risk categories of groundwater emergence during a 1% AEP event. Access and escape are likely unavailable during the 1% AEP plus climate change event. Therefore, access and escape will need to be confirmed as part of a site-specific Flood Risk Assessment and a Flood Response Plan may be required. The developable area of the site is identified to be 100%, and should be adjusted to remove the small area at risk of flooding. Development should be situated within Flood Zone 1, outside of the area at risk of fluvial flooding, and steered towards areas at lowest risk of surface water and groundwater flooding. A site-specific Flood Risk Assessment will be required to demonstrate that the development can be made safe for its lifetime without impacting on flood risk elsewhere.
MRTCoffee6.3	The site is shown to be located within Flood Zone 1 of the Flood Map for Planning.

Site Name	Comments
	The site is shown to be at risk of surface water flooding with a 9% coverage during the 0.1% AEP event. During the 1% AEP plus climate change event 11% is shown to be at risk. The site is located within a Critical Drainage Catchment therefore specific policy requirements should be considered prior to development. Access and escape are likely unavailable during the 1% AEP plus climate change event. Therefore, access and escape will need to be confirmed as part of a site-specific Flood Risk Assessment and a Flood Response Plan may be required. The developable area of the site is identified to be 100%, and therefore development should be steered towards areas at lowest risk of surface water flooding. A site-specific Flood Risk Assessment will be required to demonstrate that the development can be made safe for its lifetime without impacting on flood risk elsewhere.
MRTFisher7.5	The site is shown to be located within Flood Zone 1 of the Flood Map for Planning. The site is shown to be at risk of surface water flooding with a 6% coverage during the 0.1% AEP event. During the 1% AEP plus climate change event 7% is shown to be at risk. The site is located within a Critical Drainage Catchment therefore specific policy requirements should be considered prior to development. Access and escape are likely unavailable during the 1% AEP plus climate change event. Therefore, access and escape will need to be confirmed as part of a site-specific Flood Risk Assessment and a Flood Response Plan may be required. The developable area of the site is identified to be 100%, and therefore development should be steered towards areas at lowest risk of surface water flooding. A site-specific Flood Risk Assessment will be required to demonstrate that the development can be made safe for its lifetime without impacting on flood risk elsewhere.

Site Name	Comments
MRTLakes2.3	The site is shown to be located within Flood Zone 1 of the Flood Map for Planning. The site is 150m away from the River Ouzel and the AIMS layer shows natural high ground in this location with a 50% AEP (1 in 2-year) standard of protection. The topography of the site is over 8mAOD above the banks of the River Ouzel. The site is shown to be at risk of surface water flooding with a 12% coverage during the 0.1% AEP event. During the 1% AEP plus climate change event 10% is shown to be at risk. Access and escape are likely available in the 1% AEP plus climate change event. The developable area of the site is identified to be 100%, and therefore development should be steered towards areas at lowest risk of surface water flooding. Consultation with the Canal and Rivers Trust should be undertaken prior to development due to the proximity of the site against the Grand Union Canal. The site is also potentially at risk if a canal breach were to occur. The residual risk of the canal should also be investigated prior to development, with consultation with the Canal and Rivers Trust. A site-specific Flood Risk Assessment will be required to demonstrate that the development can be made safe for its lifetime without impacting on flood risk elsewhere.

Site Name	Comments
MRTNeth5.6	The site is shown to be located within Flood Zone 1 of the Flood Map for Planning. The site is shown to be at risk of surface water flooding with an 8% coverage during the 0.1% AEP event. During the 1% AEP plus climate change event 6% is shown to be at risk. Access and escape are likely available in the 1% AEP plus climate change event. The developable area of the site is identified to be 100%, and therefore development should be steered towards areas at lowest risk of surface water flooding. A site-specific Flood Risk Assessment will be required to demonstrate that the development can be made safe for its lifetime without impacting on flood risk elsewhere.
MRTShenWd12.1	The site is shown to be located within Flood Zone 1 of the Flood Map for Planning. The site is shown to be at risk of surface water flooding with a 11% coverage during the 0.1% AEP event. During the 1% AEP plus climate change event 8% is shown to be at risk. The site is located within a Critical Drainage Catchment therefore specific policy requirements should be considered prior to development. Access and escape are likely available in the 1% AEP plus climate change event. The developable area of the site is identified to be 75%, and therefore development should be steered towards areas at lowest risk of surface water flooding. A site-specific Flood Risk Assessment will be required to demonstrate that the development can be made safe for its lifetime without impacting on flood risk elsewhere.

Site Name	Comments
MRTShenWd13.1	The site is shown to be located within Flood Zone 1 of the Flood Map for Planning. The site is shown to be at risk of surface water flooding with a 7% coverage during the 0.1% AEP event. During the 1% AEP plus climate change event 5% is shown to be at risk. The site is located within a Critical Drainage Catchment therefore specific policy requirements should be considered prior to development. Access and escape are likely available in the 1% AEP plus climate change event. The developable area of the site is identified to be 75%, and therefore development should be steered towards areas at lowest risk of surface water flooding. A site-specific Flood Risk Assessment will be required to demonstrate that the development can be made safe for its lifetime without impacting on flood risk elsewhere.

C Level 2 Sites Summary

Site Name	Comments
CMK	The site has generally been identified to be a low risk of flooding. 18% of the site is identified to be at risk of surface water flooding in the 0.1% AEP event (2025 data) and 12% of the site is to be at risk of surface water flooding in the 1% AEP climate change event (pre 2025 data). Development should be steered towards areas at lowest risk of surface water flooding. The following points should be considered in development of this site: • The Sequential Test must be passed; however the Exception test is not applicable to this site. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. The FRA should demonstrate that the development will be safe from surface water flooding for its lifetime and will not increase flood risk elsewhere. • The FRA will also be required to demonstrate that the development will not increase the flood risk to the nearby Critical Drainage Catchments, and where possible will provide an improvement to the existing situation.
Wadhurst Lane	The site has generally been identified to be a low risk of flooding. 11% of the site is identified to be at risk of surface water flooding in the 0.1% AEP event. Development should be steered towards areas at lowest risk of surface water flooding. The following points should be considered in development of this site: • The Sequential Test must be passed; however the Exception Test is not applicable to this site. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. • The site is located within the Milton Keynes Critical Drainage Catchment and specific policy requirements should be considered prior to development. • The site is located within the Buckingham & River Ouzel Internal Drainage Board and specific policy requirements should be considered prior to development.
Brunel Centre, Bletchley	The Brunel Centre site in Bletchley Milton Keynes is at low risk of fluvial flooding. The site is at risk of surface water flooding with 14% of the site being at risk in a 3.3% AEP flooding event and 77% being at risk of flooding in the 0.1% AEP event. 54% of the site is at risk of surface water

Site Name	Comments
	flooding in the 1% AEP event plus climate change. Development should be steered towards areas at lowest risk of surface water flooding. The site is generally at low risk of groundwater flooding. For over half the site, subsurface assets would be at risk from groundwater flooding during a 1% AEP event, with groundwater levels 0.5 to 5m below surface, but surface water manifestation is unlikely. The site has 19 historic sewer flood incidents with 100m of its boundary and is located within a Milton Keynes Critical Drainage Catchment. The following points should be considered in development of this site: • The Sequential Test must be passed; however the Exception test is not applicable to this site. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. The FRA should demonstrate that the development will be safe from surface water flooding for its lifetime and will not increase flood risk elsewhere. • The site is located within the Milton Keynes Critical Drainage Catchment and specific policy requirements should be considered prior to development. • Access and escape should be investigated prior to development within the site-specific FRA. • Consultation with the Local Authority, Lead Local Flood Authority, Environment Agency and Anglian Water should be undertaken at an early stage.

Site Name	Comments
Buckingham House	The Buckingham House site in Bletchley Milton Keynes is at low risk of fluvial flooding and groundwater flooding. The northern site boundary is at risk of surface water flooding in the 3.3% and 1% AEP events, with 14% of the site being at risk in a 1% AEP event. 20% of the site is at risk of surface water flooding in the 1% AEP event plus climate change event. Development should be steered towards areas at lowest risk of surface water flooding. The site has 6 historic sewer flood incidents within 100m of its boundary and is located within the Milton Keynes Critical Drainage Catchment. The following points should be considered in development of this site: • The Sequential Test must be passed; however the Exception test is not applicable to this site. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. The FRA should demonstrate that the development will be safe from surface water flooding for its lifetime and will not increase flood risk elsewhere. • The site is located within the Milton Keynes Critical Drainage Catchment and specific policy requirements should be considered prior to development. • Consultation with the Local Authority, Lead Local Flood Authority, Environment Agency and Anglian Water should be undertaken at an early stage.
Campbell Park G4.3, G4.1, G4.2	The Campbell Park site in Central Milton Keynes is at low risk of fluvial flooding and groundwater flooding. The site is in general at low risk of surface water flooding with 12% of the site being at risk during a 1% AEP event according to the 2025 data. 15% of the site is shown to be risk of surface water flooding in the 1% AEP climate change event. The areas at risk are in the south of the site, in the vicinity of the suspected drainage ditches. However, these drainage ditches are likely to be culverted and thus connected to each other. These culverts are not thought to be represented in the RofSW data. Therefore, the RoFSW is likely to be overestimating the flood extent at the site. The following points should be considered in development of this site: • The Sequential Test must be passed; however the Exception test is not applicable to this site. • Detailed modelling of the drainage ditch is done by the developer as part of a site-specific FRA to assess the risk of surface water flooding.

Site Name	Comments
	• Development should be steered away from the drainage ditch in the south of the site as this area is identified to be at risk of flooding from surface water. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. • Consultation with the Local Authority, Lead Local Flood Authority, Environment Agency, Canal and Rivers Trust and Anglian Water should be undertaken at an early stage. • The residual risk from the Grand Union Canal and the culverts (suspected on being onsite) should be investigated prior to development.
F1.2, 1.3, 1.4	The F1.2, 1.3, 1.4 site in Central Milton Keynes is at low risk of fluvial flooding and groundwater flooding. Most of the site is also at low risk from surface water flooding, with only 4% of the site being at risk in a 1% AEP event before climate change is accounted for using 2025 data. 8% of the site is at risk in the 1% AEP climate change event. It is unknown if there are existing drainage ditches or culverts on the site and this should be investigated prior to development. The following points should be considered in development of this site: • The Sequential Test must be passed; however the Exception test is not applicable to this site. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. The FRA should demonstrate that the development will be safe from surface water flooding for its lifetime and will not increase flood risk elsewhere. • Consultation with the Local Planning Authority, Lead Local Flood Authority, Environment Agency and Anglian Water should be undertaken at an early stage.
F4.4	The F4.4 site in Central Milton Keynes is at low risk of fluvial flooding and groundwater flooding. The site is shown to be at risk of surface water flooding with 12% of the site being at risk during a 1% AEP event and 54% in the 0.1% AEP event. 39% of the site is shown to be at risk of surface water flooding in the 1% AEP climate change event. The areas at highest risk are in the south-east of the site, in the vicinity of the drainage ditches. However, it is likely that there is a culvert present, that is not thought to be represented in the RofSW data, therefore the RoFSW is likely to be overestimating the flood extent at the site.

Site Name	Comments
	The following points should be considered in development of this site: • The Sequential Test must be passed; however the Exception test is not applicable to this site. • Detailed modelling of the drainage ditch should be done by the developer as part of a site-specific FRA to assess the risk of surface water flooding. • Development should be steered away from the drainage ditch in the south of the site as this area is identified to be at high risk of flooding from surface water. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. The FRA should demonstrate that the development will be safe from surface water flooding for its lifetime and will not increase flood risk elsewhere. • Consultation with the Local Authority, Lead Local Flood Authority, Environment Agency and Anglian Water should be undertaken at an early stage. • The residual risk from the culverts (suspected as being onsite) should be investigated prior to development.

Site Name	Comments
Former Police & Fire Station	The centre and south-eastern corner of the site is shown to be at risk of surface water flooding during the 3.3% AEP event (high risk). 50% of the site is shown to be at risk of surface water flooding in the 1% AEP climate change event. Development should be steered towards areas at lowest risk of surface water flooding. The following points should be considered in development of this site: • The Sequential Test must be passed; however the Exception test is not applicable to this site. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. The FRA should demonstrate that the development will be safe from surface water flooding for its lifetime and will not increase flood risk elsewhere. • The site is located within a Critical Drainage Catchment and development should be checked against specific policy requirements within the Milton Keynes Council Surface Water Management Plan and the Surface Water Drainage Guidance for Developers documentation. • Safe access and escape routes within and to the site should be investigated and confirmed prior to development. • Consultation with the Local Authority, Lead Local Flood Authority, Environment Agency and Anglian Water should be undertaken at an early stage.
Former Sainsburys Site	The centre of the site is shown to be at risk of surface water flooding. 5% of the site is at risk in the 3.3% AEP event (high risk) and 23% in the 0.1% AEP event (low risk). 24% of the site is shown to flood during the 1% AEP plus climate change event. Development should be steered towards areas at lowest risk of surface water flooding. The following points should be considered in development of this site: • The Sequential Test must be passed; however the Exception test is not applicable to this site. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. The FRA should demonstrate that the development will be safe from surface water flooding for its lifetime and will not increase flood risk elsewhere. • The site is located within a Critical Drainage Catchment and development should be checked against specific policy requirements within the Milton Keynes Council Surface Water

Site Name	Comments
	Management Plan and the Surface Water Drainage Guidance for Developers documentation. • Safe access and escape routes within and to the site should be investigated and confirmed prior to development.
H1.1	The site has generally been identified to be a low risk of flooding at this time. 15% of the site is identified to be at risk of surface water flooding in the 1% AEP event plus climate change. Development should be steered away from the surface water flow path in the north of the site. The following points should be considered in development of this site: • The Sequential Test must be passed; however the Exception test is not applicable to this site. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. The FRA should demonstrate that the development will be safe from surface water flooding for its lifetime and will not increase flood risk elsewhere. • The FRA will also be required to demonstrate that the development will not increase the flood risk to the nearby Critical Drainage Catchments, and where possible will provide an improvement to the existing situation. • Consultation with the Canal and River Trust should be undertaken prior to development due to the proximity of the site against the Grand Union Canal. • Consultation with the Local Planning Authority, Lead Local Flood Authority, Environment Agency and Anglian Water should be undertaken at an early stage.
Isaacson Drive	The site has been identified to be a low risk of fluvial and groundwater flooding. The site is also mostly at low risk from surface water flooding. Approximately 8% of the site is at risk from a 3.3% AEP surface water flooding event and 14% at risk in the 0.1% AEP event. The area at high risk (3.3% AEP event) is found around the two topographic depressions and therefore development should be steered away from this area. The existing drainage at the site should be investigated prior to development and assessed as part of a site-specific FRA. The following points should be considered in development of this site: • The Sequential Test must be passed; however the Exception test is not applicable to this site. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. The FRA should demonstrate that the development

Site Name	Comments
	will be safe from surface water flooding for its lifetime and will not increase flood risk elsewhere. • Consultation with the Local Authority, Lead Local Flood Authority, Environment Agency and Anglian Water should be undertaken at an early stage. • The FRA will also be required to demonstrate that the development will not increase the flood risk to the nearby Critical Drainage Catchments, and where possible will provide an improvement to the existing situation.
Land at Bergamot Gardens	The Land at Bergamot Gardens site in Central Milton Keynes is at low risk of fluvial flooding and groundwater flooding. The site is also mostly at low risk from surface water flooding, with 6% of the site being at risk in a 1% AEP present-day event and 15% in the 0.1% AEP event. 19% of the site is shown to be at risk of flooding from surface water in the 1% AEP climate change event. Development should be steered towards areas at lowest risk of surface water flooding, away from the western boundary of the site. The following points should be considered in development of this site: • The Sequential Test must be passed; however, the Exception Test is not applicable to this site. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. The FRA should demonstrate that the development will be safe from surface water flooding for its lifetime and will not increase flood risk elsewhere. • The site is located within a Critical Drainage Catchment and development should be checked against specific policy requirements within the Milton Keynes Council Surface Water Management Plan and the Surface Water Drainage Guidance for Developers documentation. • The site is located within the Buckingham & River Ouzel Internal Drainage Board district and specific policy requirements should be considered prior to development. • Consultation with the Local Planning Authority, Lead Local Flood Authority, Environment Agency, IDB and Anglian Water should be undertaken at an early stage. • Consideration is given to the safe access and escape to the site during the design flood event. A Flood Response Plan should be prepared in line with ADEPT guidance.

Site Name	Comments
Parcel 3 Open University	The site has generally been identified to be at moderate risk of flooding, as the site is shown to be at risk of surface water flooding. 53% of the site is shown to be at risk of surface water flooding in the 0.1% AEP event (based on the 2025 dataset). 42% of the site is shown to be at risk of flooding in the 1% AEP climate change event. Development should be steered towards areas at lowest risk of surface water flooding, predominantly located in place of the Frank Henshaw building to the north. The following points should be considered in development of this site: • The Sequential Test must be passed; however the Exception test is not applicable to this site. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. The FRA should demonstrate that the development will be safe from surface water flooding for its lifetime and will not increase flood risk elsewhere. • Given the surface water risk to the site, mitigation measures (such as Property Flood Resilience) may need to be considered as part of detailed design. • Development should be checked against specific policy requirements within the Milton Keynes Council Surface Water Management Plan and the Surface Water Drainage Guidance for Developers documentation. • Consultation with the Local Planning Authority, Lead Local Flood Authority, Environment Agency and Anglian Water should be undertaken at an early stage.

Site Name	Comments
Powis Lane	The site has generally been identified to be a low risk of flooding, with 8% of the site at risk of surface water flooding during the 1% AEP event and 11% in the 1% AEP climate change event. Development should be steered towards areas at lowest risk of surface water flooding located across the western portion of the site. The following points should be considered in development of this site: • The Sequential test must be passed; however the Exception test is not applicable to this site. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. The FRA should demonstrate that the development will be safe from surface water flooding for its lifetime and will not increase flood risk elsewhere. • The site is located within a Critical Drainage Catchment and development should be checked against specific policy requirements within the Milton Keynes Council Surface Water Management Plan and the Surface Water Drainage Guidance for Developers documentation. • Consultation with the Local Planning Authority, Lead Local Flood Authority, Environment Agency and Anglian Water should be undertaken at an early stage.
Singleton Drive	The site has generally been identified to be a low risk of flooding. 10% of the site is identified to be at risk of surface water flooding in the 1% AEP plus climate change event. Development should be steered towards areas at lowest risk of surface water flooding located across the northern and southern portions of the site, and away from the surface water flow path across the centre of the site. The following points should be considered in development of this site: • The Sequential Test must be passed; however the Exception test is not applicable to this site. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. The FRA should demonstrate that the development will be safe from surface water flooding for its lifetime and will not increase flood risk elsewhere. • The site is located within a Critical Drainage Catchment and development should be checked against specific policy requirements within the Milton Keynes Council Surface Water Management Plan and the Surface Water Drainage Guidance for Developers documentation.

Site Name	Comments
	• Consultation with the Local Planning Authority, Lead Local Flood Authority, Environment Agency and Anglian Water should be undertaken at an early stage.
West of Vernier Crescent	The site has generally been identified to be a low risk of flooding. 14% of the site is at risk of surface water flooding in the 0.1% AEP event. 9% of the site is identified to be at risk of surface water flooding in the 1% AEP event plus climate change. Development should be steered towards areas at lowest risk of surface water flooding located within the southern portion of the site. The following points should be considered in development of this site: • The Sequential Test must be passed; however the Exception test is not applicable to this site. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. The FRA should demonstrate that the development will be safe from surface water flooding for its lifetime and will not increase flood risk elsewhere. • The site is partially located within a Critical Drainage Catchment and development should be checked against specific policy requirements within the Milton Keynes Council Surface Water Management Plan and the Surface Water Drainage Guidance for Developers documentation. • Consultation with the Local Authority, Lead Local Flood Authority and Anglian Water should be undertaken at an early stage.
Wolverton Works	The site has generally been identified to be at a moderate risk of surface water flooding. The site is shown to be at risk of surface water with up to 35% coverage during the 1% AEP present day event and 65% coverage in the 0.1% AEP event (2025 data). Flood depths across much of the site exceed 300mm and therefore careful consideration of safe access and escape arrangements will be needed. The western portion of the site is also shown to be at risk of groundwater flooding. The following points should be considered in development of this site: • The Sequential Test must be passed; however the Exception test is not applicable to this site. • At the planning application stage, a site-specific FRA will be required, and a Surface Water Drainage Strategy should be undertaken. The FRA should demonstrate that the development

Site Name	Comments
	will be safe from surface water flooding for its lifetime and will not increase flood risk elsewhere. • Given the surface water risk to the site, mitigation measures may need to be considered as part of detailed design. • The site is located within a Critical Drainage Catchment and development should be checked against specific policy requirements within the Milton Keynes Council Surface Water Management Plan and the Surface Water Drainage Guidance for Developers documentation. • Consultation with the Local Authority, Lead Local Flood Authority, Environment Agency and Anglian Water should be undertaken at an early stage. • Consultation with the Canal and River Trust should be undertaken prior to development due to the proximity of the site against the Grand Union Canal.

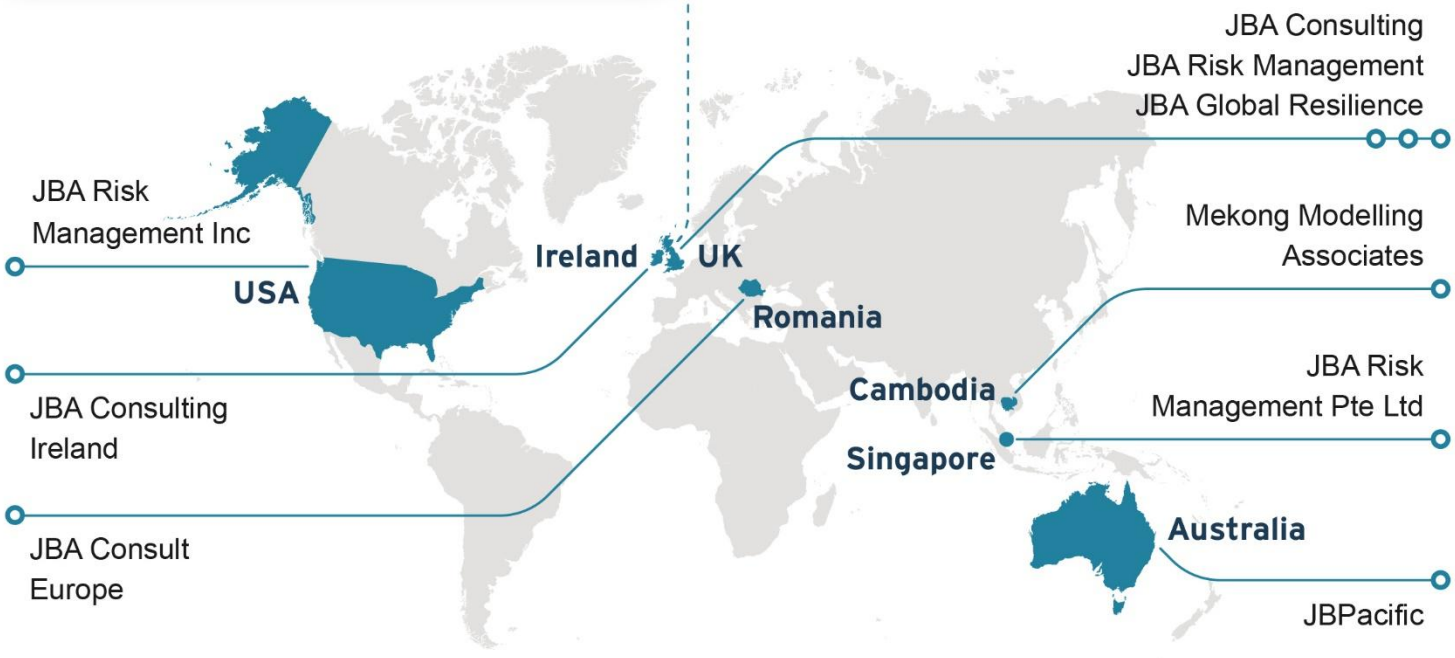
D Data sources used in this SFRA

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