

Lead Local Flood Authority response to MK City Plan 2050 – Regulation 19 Consultation

19 December 2025

To Whom It May Concern,

Milton Keynes City Plan 2050

Proposed Submission Stage Representation

Thank you for the opportunity to review and provide comments on the MK City Plan 2050 (MKCP 2050) to help deliver ambitions for the future of MK. Please find below our representation. We have included text where we believe changes should be made and supported with evidence where possible.

The role of the Lead Local Flood Authority (LLFA) includes undertaking the statutory consultee role for providing technical advice on surface water drainage to local planning authorities on major developments. The LLFA also have a responsibility for managing flooding from surface water flooding, ordinary watercourses as well as groundwater flooding.

As such, the response is primarily focused on the Flood and Water Management section but then proceeds to provide some wider comments on overlapping policies within the document.

Should you have any follow-up questions, we welcome further engagement through [REDACTED].

Kind regards,

Flood and Water Management Team

Lead Local Flood Authority

[REDACTED]

Need to contact us?

[REDACTED]

[REDACTED]

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Flood and Water Management

Para 344. Please note that The SuDS Manual is about to be updated in the coming months. May be worth including wording around 'and or subsequent versions'.

Para 346. This paragraph is missing wording for resilience to long term changes to reference documents or available mapping. As this would conflict with Policy CEA15 Managing flood risk Para C, which suggests all FRAs should determine this where no detailed modelling exists. This Para should clarify that this has been applied in lieu of 3.3% AEP event detailed modelling being available.

As Functional Floodplain is defined as:

Functional floodplain will normally comprise:

- *land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or*
- *land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding).*

We propose adding an additional paragraph to avoid clash of policy and relate to SFRA, which states that detailed modelling may supersede this approach (effective policy needed).

Policy CEA 13 Sustainable drainage systems (SuDS) and integrated flood risk and water management

The title of the policy is confusing and upon review of the policy we note that it could benefit from changing the 'integrated flood risk and water management' to 'Sustainable Drainage Systems (SuDS) and Integrated Flood and Water Management'. There is an entire policy on Flood Risk under CEA15. IWMS is for balancing water supply, drought and flood risk, biodiversity and water quality, ensuring that cities, communities, and infrastructure are prepared for the future.

Policy CEA Part A. Para 182 of the NPPF states that applications which **could affect drainage on or around the site should incorporate sustainable drainage systems** to control flow rates and reduce

volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major development should: a) take account of advice from the Lead Local Flood Authority; b) have appropriate proposed minimum operational standards; and c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development.

As this stands, we believe Para A is more focussed on IWMS rather than just drainage characteristics. We would expect Para A to be more strategic with IWMS focus with drainage becoming point 1 matching with Para 182. We propose the following wording:

A: Development proposals must adopt an integrated approach to managing all sources of flood risk at a scale that is proportionate to the size and nature of the development.

In relation to term 'managing flood risk' in Part A. Please note that sources (of flood risk) include rivers and the sea, direct rainfall on the ground surface, rising groundwater, overwhelmed sewers and drainage systems, reservoirs, canals and lakes and other artificial sources. Flood risk also accounts for the interactions between these different sources.

Part A also makes reference to incorporating SuDS and a surface water management strategy, we are unsure in what context the LPA notes them as different things.

National Planning Policy Framework: proposed reforms and other changes to the planning system:

Policy is partly a redraft of paragraph 182 of the current Framework, which requires all development proposals that have drainage implications to incorporate Sustainable Drainage Systems. The policy adds a new requirement that Sustainable Drainage Systems should be designed in accordance with the National Standards for Sustainable Drainage Systems to provide a consistent basis for improving their design.

Part A Points 1-9. This covers many topics/overlap for 'sources of flooding' and further organisation of topic areas may be required. For example colour coding below as a general interpretation:

Surface water – Yellow; Fluvial Primarily – Blue; Other/all sources of flood risk – Green; IWMS – Pink; Foul - Brown

1. Flood risk management and SuDS systems are provided at a strategic scale, where possible, with SuDS features of different scales performing in an integrated manner;
2. SuDS and fluvial flood risk reduction features are appropriately integrated into the design and layout of the development;
3. Above ground attenuation is provided wherever feasible. Where this is not feasible and below ground attenuation is being proposed, an evidenced justification must be provided;
4. SuDS are designed as multi-purpose green infrastructure, to maximise complementary environmental, biodiversity, social and amenity value;
5. The use of land to provide flood storage capacity must protect floodplain habitats and not conflict with required amenity and recreation provision for the site;
6. SuDS are designed for climate change and the potential impact it may have over the lifetime of the proposed development;
7. Proposals within Critical Drainage Catchments, as identified in the appendices of the SFRA, must investigate the potential to reduce or mitigate existing flood risk in the surrounding area;
8. Provide details of future management, maintenance and adoption of the SuDS and flood risk management systems prior to the granting of planning permission, outlining how they will be funded and function effectively over the lifespan of the development; and
9. Where feasible, proposals explore opportunities for de-culverting watercourses and the creation of wetlands, wet grasslands and/or wet woodlands, and restore natural river flows and floodplains.

B. Development proposals must demonstrate that water supply, foul sewerage and sewage treatment capacity is available or can be made available in time to serve the development. Suitable access must be safeguarded for the maintenance of water supply and foul water infrastructure.

Part A Point 4. We would see this section being more aligned with National Standards e.g. four pillars of SuDS looks for flood risk, water quality, amenity and biodiversity. We would also like to see adding wording on 'open space' and removal of the term 'complementary'.

Part A Point 9. National Planning Policy Framework: proposed reforms and other changes to the planning system

A further change also introduces a new policy to avoid the enclosure of watercourses and encourage the de-culverting and re-naturalising of river channels. This addition is intended to

deliver multiple social and environmental benefits of re-naturalising rivers, including improvements to water management.

Part B. Support the wording here but it appears that the surface water disposal capacity in the current format would not be protected elsewhere in the policy wording.

Policy CEA14 Protecting and enhancing watercourses

Part A. It should be clear if this means from any bank of the river since e.g. IDB will sometimes state one side (under Byelaws), which is for maintenance only. Adequate buffer zones alongside watercourses are not just for general maintenance purposes.

Proposed wording: To ensure an adequate undeveloped buffer zone, development proposals must maintain a minimum set back of eight metres on both sides of the river bank from any main river and at least nine metres from all other ordinary watercourses.

In relation to 'The provided buffer strip should not form part of private gardens' we propose to amend to say: The buffer strip should be accessible for maintenance equipment and should not form part of private gardens.

Policy CEA15 Managing flood risk

CEA 13 and CEA15 are overlapping between flood risk and SuDS - it isn't very clear why this approach has been taken – we hope the additional wording provided would help with this and repetition. We also note different sources of flood risk are being made reference to inconsistently across policies. The policy needs all sources of flooding like before to install an overarching introduction to flood risk - we propose additional new Part A to be inserted at the start of the policy:

Development proposals will be required to take into account all forms of flooding including, but not limited to fluvial, groundwater, surface water and reservoir flooding.

We are also proposing a **revised order of the parts of the policy** as follows to provide better context:

- New wording to become A, E, Previous A, F, C, D, B.

National Planning Policy Framework: proposed reforms and other changes to the planning system

F7: Ensuring Development is Safe from Flooding This policy redrafts elements of paragraphs 170 and 181 of the current Framework to ensure development is safe for its lifetime and does not increase flood risk elsewhere. It sets out clear criteria for assessing proposals and specifies that development which does not meet these criteria should be refused.

Part B. In relation to: ‘Where this is not practicable, a relaxation factor of no greater than five times the target 50% and 1% greenfield runoff rates shall be applied’; Proposed change to: ‘Where this is not practicable, a relaxation factor of no greater than five times the greenfield runoff rate shall be applied’.

Part C. *NPPF Para 172 - All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property (Strategic reference).* Flood Zone 3b is fluvial only and the wording of Part C is proposed to be changed as follow: ‘Site-Specific Flood Risk Assessments must define the extents of Flood Zone 3b where no detailed modelling exists. Where detailed modelling is available, the Flood Risk Assessment must ensure that this modelling is fit for purpose for the proposal. It must include all relevant flood risk scenarios from all sources.’

Part D. Suggestion - Development proposals must not increase surface water runoff from a site or contribute to cumulative effects. The peak allowable discharge rate from the development to surface waters or sewers for the 50% AEP event shall be limited to the equivalent 50% AEP greenfield runoff rate, or 3 l/s/ha, whichever is the greater.

Part E. National Planning Policy Framework: proposed reforms and other changes to the planning system

F5: The Sequential Test This policy consolidates references to the sequential test set out in paragraphs 173 to 176 and 180 of the current Framework, which steer development to areas of

lowest flood risk. The policy explains when the sequential test is required and how it should be applied. Changes are proposed to provide additional clarification as to when the sequential test is not required, including in instances where a site is potentially at risk from surface water flooding, but where a site-specific flood risk assessment demonstrates that the proposed layout, design, and mitigation measures would ensure the development would be safe for its lifetime. A further addition to the policy clarifies that the area to which the sequential test is applied should consider the anticipated catchment of the development in terms of its likely occupiers or users. The proposed policy states that development proposals should not be located in areas at risk of flooding if reasonably available alternative sites exist, but omits reference to development “not being permitted”, as it may still be appropriate for development to proceed in these circumstances, when weighed against other considerations (and subject to the other tests in the chapter being satisfied, including that the development would be safe for its lifetime). These changes reflect recent updates to the Flood Risk and Coastal Change Planning Practice Guidance, made in September this year.

F6: Development in Areas at Risk of Flooding from Rivers or the Sea 96 This policy consolidates the majority of references to the ‘exception test’ in paragraphs 177 to 180 of the current Framework, but is also drafted to make clearer that this test operates in the context of what development types are regarded as incompatible with risk of flooding from rivers or the sea. To do this, the expanded policy refers directly to tables which are currently set out in Planning Practice Guidance, but which are now set out as new Annex F in the draft Framework. The remainder of the policy then sets out the circumstances in which exceptions may be permitted through the application of the exception test. New wording has been included to clarify the circumstances in which the exception test need not be applied, including where development is proposed on an allocated site which was subject to the exception test during plan-making, unless there has been a significant increase in the risk of flooding to the site, or a more vulnerable use is proposed.

Part G. National Planning Policy Framework: proposed reforms and other changes to the planning system

F4: Assessing Flood Risk for Decision-Making This policy, partly based on paragraph 181 of the current Framework, sets out when site-specific flood risk assessments are required. The policy includes changes to aid clarity, such as moving information from current footnote 63 to within the policy text, and a new reference to the Flood Map for Planning.

Flood Risk Assessments: Where has this wording come from as it should align with PPG. Should move minor and change of use to the top before list. And then consider with: *GOV.UK states: When you need a flood risk assessment*

You should complete a FRA for all development (including [minor development](#) and changes of use) proposed:

- *in Flood Zones 2 or 3 or see [flood map for planning](#)*
- *within Flood Zone 3b*
- *within Flood Zone 1 with a site area of 1 hectare or more*
- *within 'Flood Zones plus Climate Change', showing it is at increased risk of flooding from rivers or sea in future - see [flood map for planning](#)*
- *with Flood Zone 1 and the [flood map for planning](#) shows it is at risk of flooding from surface water*
- *in areas with critical drainage problems*
- *within Flood Zone 1 where the LPA's strategic flood risk assessment (SFRA) shows it will be at increased risk of flooding during its lifetime*
- *that increases the [vulnerability classification](#) and may be subject to sources of flooding other than rivers or sea*

In relation to Section 4: Should align with PPG: This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding. PPG Paragraph: 023. Also will SFRA be in place for the lifetime of this local plan? What if the LLFA update the SWMP? This needs future proofing (there is no year, and we are about to update these):

All sites highlighted as being at high risk from surface water flooding, or which are located within a Critical Drainage Catchment as identified **in Appendix P of the Strategic Flood Risk Assessment, will be required to provide a Flood Risk Assessment** that demonstrates 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. **Suggestion replaced with 'as identified by Milton Keynes City Council'.**

Other Relevant Policies

Policy GS8 Hanslope Park

No comment within on impact of flood risk in this area. Hanslope Park is partially at risk from flooding from an ordinary watercourse. This section of Highway is regularly inundated from the natural processes of the watercourse. Additional measures may be needed to account for/manage increased traffic also. Suggestion within B to include wording or similar to: Ensure the site has convenient and safe access to the primary road network where areas are susceptible to frequent and more severe flooding in future.

Policy GS11 Adjacent and cross-boundary growth

Contains positive inclusions regarding flood risk management. Supportive.

Policy CEA2 Green roofs and walls

For Information - National Standards for SuDS states:

2.2 Evidence shall be provided that the approach to managing runoff from 'everyday' rainfall has been developed alongside and in support of the management of runoff quality (standard 4) and the delivery of amenity and biodiversity benefits (standards 5 and 6).

General requirements

2.3 For developments that incorporate rainwater harvesting so no runoff leaves the development for lower order design storm events, the surface water drainage system is deemed compliant with standard 2. Evidence of this approach shall be provided in the form of calculations to BS EN 16941

2.7 The interception methods below shall be considered to be compliant for zero runoff for the first 5mm rainfall for 80% of events during the summer and 50% in winter, with the following presumptions for each system.

Green roofs or walls

All surfaces that have green roofs or green walls that drain their own surface area only.

Policy CEA5 Water efficiency

Standard 2: management of everyday rainfall (interception) of the National Standards for SuDS aligns with elements of this policy.

The inclusion of water butts is not considered to comply with standard 2 where they are limited to garden use during dry periods. They do not guarantee that storage will be available unless designed as such, in which case detailed calculations shall be provided to demonstrate compliance.

Section 3: SuDS tree pits references are a positive inclusion.

Policy CEA7 Mitigating wider environmental pollution

Paragraph A: Positive inclusion as includes reference to groundwater and SuDS delivery would achieve mitigating the named impacts.

Paragraph M: Unclear why only major here as NPPF requires multifunctional SuDS (e.g. water quality). Would National Standard support this policy further? Would the pending updated Groundwater Protection Guidance support this?

Policy CEA10 Protection and enhancement of the environmental infrastructure network, priority species and priority habitats

Paragraph A: Positive inclusion when considering quality of SuDS adjacent any of our existing corridors etc.