

ANNEX A: INDEPENDENT FLOOD REVIEW RECOMMENDATIONS AND PROGRESS STATUS

Note: All text in red is where amendments have been made to the original AECOM IFR text in order to ease understanding for the reader or to make clarifications.

Lead	Impact Explanation	Resource	Resource Explanation	Timescale for delivery	Timescale Explanation	Impact	Impact Explanation
LLFA	Lead Local Flood Authority	S	Small	I	Imminent (less than 6 months)	H	High
MKC Integrated	A number of teams working together	M	Medium	S	Short (6 months - 2 years)	M	Medium
TVLRF	Thames Valley Local Resilience Forum (also referred to as the LRF)	H	High	M	Medium (2-5 years)	L	Low
EP	Emergency Planning	VH	Very high	L	Long (5+ years)		
MKUJH	MK University Hospital	Variable	Variable	O	Ongoing		
AW	Anglian Water						

RAG Rating
Complete
On target
Commenced/in progress - there may be some minor or major constraints to overcome as part of the project so expectations should be managed appropriately, but this is part of the process.
Work has not commenced yet or notable challenges have arisen. (e.g. action may need further scoping, funding or management and/or councillor input to unlock challenge)
Not for MKC to rate progress at this stage - relates purely to an external partner

Section	Actions	Lead	Resource	Timescale	Impact	Progress (RAG rated)	Cabinet Member
3: Review of Flood Investigation Reports (FIR)	Policy and Protocol						
	R.3.1	MKC's flood investigation policy and protocol should be implemented and published on a dedicated section of the MKC website. Monitoring the compliance of the policy should be undertaken and reported on an annual basis. This will help demonstrate the ongoing commitment of MKC fulfilling its LLFA duties. It is understood that MKC is committed to the implementation of this policy and protocol and is currently working on publishing the final version.	LLFA	L	S	L	The Flood Investigation Protocol is currently published and available online through the Flood and Water Management/Drainage webpage in Part 4; Section 19 - Flood Investigations.
	R.3.2	MKC's policy on flood investigations should be reviewed after all future flood events and following each iteration of the Local Flood Risk Management Strategy (LFRMS). This will enable MKC to reflect on the appropriateness of the policy in the context of specific flood event characteristics and ensure it includes the most current industry good practice.	LLFA	L	O	L	Incorporated into Flood Investigation policy
	R.3.3	The Local Flood Risk Management Strategy for MKC should be updated to include the flood investigation policy. This will aid practitioners as strategic information of managing flood risk within the administrative boundary of Milton Keynes will be documented in one location.	LLFA	L	M	L	To be done as part of a future strategy review (start date to be agreed depending on the relative priority of this compared to delivering flood schemes).
	R.3.4	Flood investigation reports must identify specific roles and duties of each RMA and stakeholder, in the context of the specific flooding event under investigation. This will help all stakeholders to distinguish between their general responsibilities in flood risk management and their specific role relative to a particular flood event, as well as providing transparency for members of the public.	LLFA	L	S	M	The Flood and Water Management/Drainage webpage identifies who are the risk management authorities. A standard specification for all future flood investigation reports is currently being developed.
	R.3.5	Flood investigation reports should be published within 6 months of a flood event. Following a significant flood event it is reasonable to expect this may take longer, however this should be communicated to members of the public and RMAs through the provision of an interim statement explaining investigatory works completed and planned.	LLFA	L	S	M	All previous flood investigations are now published. Requirements for delivery are being included within the standard specification that is being drafted for a future flood investigation reports. Requirements will be met for new investigations.
Communication	MKC should notify all partners of the publication of a flood investigation report. This will aid the relevant organisation or individual to take forward recommendations made in reports and therefore improve flood risk management.	LLFA	L	O	L	To be included within the flood investigation report specification	

4: Summary of flooding event	Operational	R.4.1 MKC must investigate measures to manage the risk of flooding to properties which sit below the road and surrounding land. This should include reducing large areas of impermeable surfaces and exploiting the green spaces within the public realm.	MKC Integrated	VH	L	H	The 40 locations across MK that flooded in May 2018 have been grouped into 20 areas and some initial desk based assessment work is in progress around the level of risk in each area and the next steps needed in each location. This is creating a pipeline of projects that the LLFA will co-ordinate, working with a number of internal teams (highways, housing etc.) and external partners. Expression of interests have been made for external funding for the pipeline. Some of the projects will require procurement of external expertise for example to model the catchments. Engagement about future area projects is now commencing with community, Parish and Town Councils to ensure their involvement throughout the process. A good working relationship has been established with Woughton Community Council and a flood plan and a project steering group is being developed.	Cllr Darlington Cllr Long (housing) Cllr Priestley (parish working)	
		R.4.2 Property owners, including housing associations, should help manage the risk of flooding to their properties and local area, where appropriate. They should inspect and maintain drainage systems within the curtilage of their properties, and be encouraged to replace impermeable surfaces with permeable alternatives to promote better surface water management at source. This must include guttering, downpipes and any other above or below ground features. Where works are required these should be planned appropriately. This may also include creating/joining a flood action group, installing property level flood resilience measures and helping to raise awareness of critical drainage assets in the local area.	Property owners	Variable	M	M	M	MKC Housing completed maintenance. MKC LLFA to engage with private owners as part of future projects.	Cllr Darlington Cllr Long (housing) Cllr Priestley (parish working)
		R.4.3 MKC and landowners should investigate measures which can better manage surface water runoff from higher ground and flow within the associated ordinary watercourses, to protect properties in Stoke Goldington.	LLFA & land owners	H	M	H	H	See response to R4.1. MKC has been working with the Parish Council, local flood group and landowners to consider the local flood risk, emergency flood plans, highway maintenance and future projects. Highways had previously installed bunds on private land to hold back flood waters. These were found to have been damaged so the bunds have now been adapted and reinforced, working closely with the relevant landowners.	Cllr Darlington
		R.4.4 MKUH should investigate the flooding which emanates from the roof and identify what remedial works are required to resolve it.	MKUH	M	M	H	H	For Milton Keynes University Hospital to programme	
		R.4.5 AWS should investigate the flooding issue at Centre:MK in detail. AWS should establish if an opportunity exists to collaborate with Centre:MK to better manage this risk.	AWS	L	M	L	L	For Anglian Water Services to programme	
		R.4.6 MKC should investigate why properties are still unoccupied and understand what support would be beneficial to the residents.	MKC Integrated	L	I	H	H	All council house tenants are back in their homes. Private residents that requested help from Housing and/or Emergency Planning have also been assisted and outstanding matters are now with their insurance companies.	Cllr Long (housing), Cllr Darlington (recovery)
		R.4.7 All partner organisations should ensure reports of flooding are shared, including between internal departments, so all are aware and take the appropriate actions. This is in response to a high proportion of survey respondents explaining their property has flooded before and they have previously reported this.	All	L	O	M	M	MKC internal process have been updated and improved. Process with external partners needs to be agreed. General Data Protection Regulation issues have arisen.	
		R.4.8 MKC should follow up with survey respondents who have identified they are unhappy with the service received during and after the event. This will help to understand why and how this could be improved in the future.	MKC Integrated	L	I	H	H	LLFA team and Customer Services are working together to develop a suitable approach as part of the Customer Experience Transformation Programme. MKC is working with Woughton Community Council and Stoke Goldington Parish Council to prepare community flood plans. Other areas intended to follow. An Initial Assessment of options for higher risk areas has been commissioned and working groups will be set up with internal and external partners.	Cllr Darlington
		R.4.9 Partner organisations should continue to collaborate to improve community awareness of flood risk within their area. This is in response to a high proportion of survey respondents from across MK who explained they were unaware of the risk.	All	L	S	M	M	TVLRF have begun the process of review of the MAFP under the leadership of the Environment Agency. The MAFP is to be brought into line with the MAFP flood plan template and guidance recently issued by DEFRA. The recommendations from this review will be shared with this group and the TVLRF Training Exercising and Organisational Learning Group. A Weekly Emergency Planning Briefing paper started in October and is circulated to all Town & Parish Councils and all Councillors detailing weather & flood warnings and information. This is updated during the week of issue	
			Communications	a. A new communications strategy for before and during a flood event, to ensure all organisations are aware of a potential incident and enable information to be shared effectively. This would support duty officers in having greater levels of intelligence to make informed decisions around key actions and implementation of the plan. b. New activation criteria, to be established with support from all Local Resilience Forum members. All agencies should know when to activate the plan and feel empowered to call an incident if their assets or service is threatened. c. An update of the flood response procedure to improve advanced monitoring of weather alerts/warnings and multi-agency communication protocols.					

	<p>d. Critical network infrastructure should be identified and mapped in relation to the risk of flooding from all sources, highlighting the 'at risk' and 'flood monitoring' locations to reflect current intelligence. Each vulnerable location should have a supplementary incident response plan to reflect its specific characteristics and needs.</p>				<p>in the event of changes. The TVLRF have introduced a new alert system. This allows agencies to be simultaneously notified of an incident and allows initiation by any participating agency. TVLRF & Hampshire & Isle of Wight LRF have jointly produced a new TVLRF Resilience Direct pages have been updated and all Multi Agency Plans will be accessible via this system. The process has started into adding MK related detailed information as appendices. The appropriate partner organisations (Category 1 & 2 Organisations) also have access to the RD pages.</p>
Emergency Plans	<p>R.5.2 The TVLRF should establish the hierarchy of emergency plans relevant to Milton Keynes and communicate this to all plan holders and relevant partners.</p>	TVLRF	L	S	M
	<p>R.5.3 The draft Severe Weather Plan, authored by MKC's Emergency Planning team, should be progressed for formal adoption. Prior to this it should be reviewed and updated to reflect the findings of this Independent Flood Review (IFR) and other risk management authorities (RMAs) consulted.</p>	EP	L	I	M
	<p>R.5.4 MKC, working with the LRF, must undertake an emergency flood exercise to test the updated plans and where appropriate provide training to all partners organisations. This training exercise should be arranged within 18 months of the issue of this IFR report and continued biennially in accordance with the Training, Exercising and Organisational Learning Group Programme.</p>	EP	L	S	H
	<p>R.5.5 RMAs responding to a flood incident in the early stages should ensure duty officers are trained on the content and use of the Multi-Agency Flood Plan, Severe Weather Plan, Communications Strategy and are trained to identify a deterioration in conditions which may require additional resources or a coordinated response. They should also be aware of the thresholds and activities of the various activation stages in the MAFP.</p>	TVLRF	L	S	H
Resources	<p>R.5.6 MKC must review its availability of resources to respond to emergency events, particularly out-of-hours. This should include:</p> <ul style="list-style-type: none"> Ensuring all relevant staff are trained in emergency response and fully aware of relevant emergency plans and where to access them prior to fulfilling this role. A record of training must be kept and monitored by MKC. The importance of communication must be emphasised during the training. The ability to mobilise a DEPRO and Incident Director to attend a location within MK, in short notice. Specific consideration as to the availability of emergency planning practitioners who can implement actions and advise the DEPRO or Incident Director during an event. This is particularly relevant for out of hours where access to this expertise is only available through goodwill. 	MKC Integrated	M	I	M
5: Response to the flood event	<p>R.5.7 TVLRF members should collectively identify what incident management and communications systems are being used across the LRF and whether improvements could be made through collaboration, sharing experiences, and lessons learnt.</p>	TVLRF	L	I	L
	<p>R.5.8 MKC should develop an Emergency Command Centre (ECC) manual which considers limiting the use of rooms identified for ECC to ensure they are available when required and staff feel empowered to do so. This should be progressed to support the setting-up and running of the ECC.</p>	EP	L	I	L

Cllr Darlington

	<p>R.5.9 Cat. 1 & 2 authorities should consider if a more proactive approach to 'amber' or worse weather warnings is appropriate. Whilst the MET office 'amber' weather warning provided ahead of the flood event in May 2018 did not cover MK, proactive resourcing would have enabled responding agencies to be better prepared.</p>	TVLRF	M	S	M	<p>Current TVLRF triggers for multi-agency response is a medium impact regardless of likelihood score on the risk assessment. This encompasses yellow and amber warnings but not warnings covering areas outside Thames Valley. We also receive notifications from Bedfordshire LRF. Review of the capacity and capability required to monitor wider area weather warnings, response and standby triggers, will need to be part of the review for the MKC Adverse Weather Plan and response arrangements.</p>	
	<p>R.5.10 MKC should consider how enquiries from members of the public outside of normal hours, above the usual volume, can be received and recorded. This may need to include a process and training for Alarm Centre staff, or a recording system which enables quick and concise entry of information.</p>	MKC Integrated	L	S	M	<p>Action to be developed as part of the Customer Experience Transformation Programme</p>	
	<p>R.5.11 Contact numbers for all partners should be updated as appropriate and shared between all TVLRF members. These numbers should not be for particular individuals but an 'emergency number' which is used by the emergency contact whilst 'on-call'.</p>	TVLRF	L	I	M	<p>Complete. This is already done on a twice-yearly basis.</p>	Cllr Darlington
Communications	<p>R.5.12 Contact details and addresses for rest centres and temporary accommodation should be reviewed to ensure they are current and appropriate for out of hours occasions.</p>	EP	L	I	L	<p>Complete. Currently we have 122 identified potential rest centres all in different ownership/management. These details are checked every 2 years, a process that can take 9 months, however will be moving to a continuous rolling programme of reviewing the contact details for added resilience. Work is being undertaken with Town & PC,s to encourage their proactive involvement in identification and the set up of rest centres.</p>	Cllr Darlington
	<p>R.5.13 All RMAs need to reflect on how members of the public can be kept abreast of their reports of flooding and progression for a resolution. Where an enquiry is passed on to another organisation due to them being better placed to lead or because the event is moving into the recovery phase, a process to manage and communicate this should be developed and agreed with all risk management authorities</p>	All	L	I	L	<p>Internally recording highways data against cases has improved with information being stored in the Confirm database. Highways have also been keeping in contact with residents by phone or as part of site visits. Site visits with residents are useful for ensuring local information is properly captured. Customer Services, Highways and LLFA to also investigate if the existing public highways online reporting system could be updated as part of the Customer Services Transformation Programme to show the public progress against their reports and to accept reports for large scale floods.</p>	Cllr Darlington
	<p>R.7.1 MKC should consider its programme of highway drainage renewal and improvement works in context of annual budgets and determine whether a business case can be developed to increase available funding.</p>	Highways	L	I	M	<p>To date work has been focused on optimising services within current budget. The current programme of works is responsive to incidents in line with priority criteria.</p>	
Operational	<p>R.7.2 MKC should update its gully emptying programme to increase attendance in 'at risk' areas. The programme could be further improved by the incorporation of intelligence from previous visits and from the new asset management system, such as silt levels, to inform the required frequency.</p>	Highways	M	I	M	<p>Highways is already in the process of moving towards a more efficient asset management cleansing programme that allows: - easier prioritisation of individual or groups of gullies that need to be cleansed before a storm, and - a quicker reaction for gully with high silt levels. To enable this Highways are currently recording data on silt levels and condition for each asset across MK and making plans for assets that need high, medium and low frequency maintenance. This is being detailed in the new 'Code of Practice for Highway Drainage' management document.</p>	Cllr Darlington
	<p>R.7.3 All partner organisations should review their protocol for inspecting flood assets upon receipt of a weather or flood warning, and managing situations where asset ownership is unknown or reported problems may require more complex/time-consuming resolutions. Particular attention should be given to inspecting assets in known flood risk areas to identify if immediate works are required. This should include ongoing communication with members of the public and councillors as appropriate.</p>	All	L	S	M	<p>Will be discussed by the Flood and Water Management Group. Action relates to external partners who already have processes in place for this.</p>	Cllr Darlington
7: Asset Management and Maintenance	<p>R.7.4 The Environment Agency should consider how all of its flood defences can be brought to the target condition grade. This may require collaborative working with partner organisations and landowners.</p>	Environment Agency	M	M	M	<p>The EA already have a process in place for considering and prioritising asset improvements.</p>	
Intelligence	<p>R.7.5 MKC's asset register could be improved by defining 'significant effect on flood risk' and identifying those assets and structures which meet this criterion. Furthermore, the format of the register could be more intuitive to improve functionality and the benefits it can deliver.</p>	LLFA	L	I	L	<p>95% of the asset data available from MKC and flood management partner organisations has been mapped and collated. The LLFA is working through a process to identify those assets that should be defined as 'significant'. The updated data will be made available to MKC officers soon and then methods will be explored for how best to share it with flood management partners.</p>	

	<p>R.7.6 All partner organisations and landowners should collaborate to establish a better understanding of general flood risk and drainage assets. This should include: ownership, condition, design standard, and where investment is required. Survey and investigatory works may be required to fill gaps and this will likely need to be programmed over a number of years. MKC should promote enhanced maintenance programmes through the Anglian Regional LLFAs and other partner organisations.</p> <p>R.7.7 MKC should reflect on its 'Customer Service Standards' to consider how it can meet these in relation to received queries and how members of the public can be kept better informed of the progress related to the problem they have reported. Of particular importance in relation to this Independent Flood Review are those enquiries related to assets and flood risk. Monitoring of performance against these standards should also be undertaken. MKC should collaborate with partners to develop a consistent approach.</p>	LLFA	H	M	H	To follow finalisation of MKC asset register	
Communications	<p>R.8.1 MKC Highways should reflect upon its current programme of flood alleviation schemes and identify those which don't have a formal design and hydraulic calculations to support them. Whilst it is recognised that works are being pursued with all the right intentions, the opportunity to achieve a higher standard of protection may be missed and/or the desired outcomes not met.</p> <p>R.8.2 All organisations proposing to deliver flood alleviation schemes should consider the incorporation of sustainable and multi-beneficial solutions. Where works to a drainage system are being undertaken, the inclusion of SUDS which deliver the four pillars should be explored. The SUDS Manual[1] is an industry accepted document providing guidance and good practice which should be referred to.</p> <p>R.8.3 MKC LLFA and AWS should reflect on the scope of IFR Scheme Ref 3 - Asset Capacity Study (Table 8-1) and consider the extent and prioritisation of which assets are included. There are numerous balancing lakes across MK performing surface water and flood risk management function where the capacity and design standard is unconfirmed. Consideration also needs to be given to communities outside of the study area but affected by flooding. They may feel drainage assets important to their locality should be included; therefore clear and consistent messaging will be required to manage relations with these communities.</p>	MKC Integrated	L	I	L	<p>The Customer Experience Transformation Programme will consider this - data is currently being collected by the council on best practice approaches. See also response to R.5.13.</p> <p>Where action could be taken quickly highways have acted to benefit communities with the best options possible within current budget limits. Future schemes will be considered in conjunction with other teams and wider flood risk modelling to ensure that outputs work for all elements of a community's needs and that greater resilience to climate change is built in. However greater budgets and longer timescales may therefore be required.</p>	Cllr Darlington
Operational	<p>R.8.4 MKC LLFA should progress IFR Scheme Ref 2 - Initial Assessments (Table 8-1) at the earliest opportunity. This will improve understanding of the problems and identify possible solutions in the areas affected by flooding during the event in May 2018. Subsequent flood alleviation schemes will need to consider the findings of this Independent Flood Review and relevant flood investigation reports. They will likely include a range of measures including engineered defences, property level resilience, and community flood action groups.</p>	All	Variable	O	M	<p>Will be done as part of future projects coming out of the Initial Assessments work</p>	
Intelligence	<p>R.8.5 Partner organisations and neighbouring local authorities should regularly meet to share information on flooding and drainage issues and identify where opportunities exist to collaboratively support a flood alleviation scheme. MKC, as the LLFA, and the Environment Agency should champion and coordinate this within MKC. The LLFA and partner organisations may prove a good starting point. Operational meetings should be held to discuss technical issues, and flood partnership meetings for strategic discussions.</p> <p>R.8.6 Partner organisations should better share with communities where flood alleviation schemes are planned within MK. It would need to be made clear at what stage each FAS is, including those in the pipeline and aspirational. This would provide a transparent programme for members of the public and help them feel progress is being made.</p> <p>R.8.7 MKC LLFA should maintain contact with the landowners of Winterhill to keep abreast of its investigation. The findings of the investigation could prove useful for MKC and it may have an opportunity to steer any future flood alleviation schemes at this location.</p>	LLFA	Variable	S	L	<p>In progress</p> <p>The 40 locations across MK that flooded in May 2018 have been grouped into 20 areas and some initial desk based assessment work is in progress around the level of risk in each area and the next steps needed in each location. This is creating a pipeline of projects that the LLFA will co-ordinate, working with a number of internal teams (highways, housing etc.) and external partners. Expression of interests have been made for external funding for the pipeline. Some of the projects will require procurement of external expertise for example to model the catchments. Engagement about future area projects is now commencing with community, Parish and Town Councils to ensure their involvement throughout the process. A good working relationship has been established with Woughton Community Council and a flood plan and a project steering group is being developed.</p>	Cllr Darlington
Communications	<p>R.8.5 Partner organisations and neighbouring local authorities should regularly meet to share information on flooding and drainage issues and identify where opportunities exist to collaboratively support a flood alleviation scheme. MKC, as the LLFA, and the Environment Agency should champion and coordinate this within MKC. The LLFA and partner organisations may prove a good starting point. Operational meetings should be held to discuss technical issues, and flood partnership meetings for strategic discussions.</p> <p>R.8.6 Partner organisations should better share with communities where flood alleviation schemes are planned within MK. It would need to be made clear at what stage each FAS is, including those in the pipeline and aspirational. This would provide a transparent programme for members of the public and help them feel progress is being made.</p> <p>R.8.7 MKC LLFA should maintain contact with the landowners of Winterhill to keep abreast of its investigation. The findings of the investigation could prove useful for MKC and it may have an opportunity to steer any future flood alleviation schemes at this location.</p>	LLFA	L	I	L	<p>Initial assessment commissioned which will bring together all partners for regular operational meetings</p> <p>Community engagement is a key part of the initial assessment work which has been commissioned. Once programme is developed this can be published accordingly.</p> <p>LLFA will make contact re this.</p>	

9: Review of Local Policy	Partnership Working	R.9.1 AWS, MKC and BGIDB should work together to publish joint plans to manage surface water flood risk. The National Infrastructure Assessment recommends this is completed by 2022. Reference to 'collaborative maintenance' should be integrated into the Local Flood Risk Management Strategy objectives	LLFA	L	S	M	This will happen as part of the review of the Anglian Flood Risk Management Plans with the EA and the new Drainage and Wastewater Management Plans that AW are starting.	Cllr Gowans (planning), Cllr Marklew (sustainability & climate change) Cllr Darlington (flood risk)
		R.9.2 Shared responsibilities associated with flood and water management should be more clearly defined within local policy by MKC and partner organisations where appropriate. For MKC it is considered most appropriate to include this information within the LFRMS.	LLFA	L	S	L	To be included within review of Local Flood Risk Management Strategy	
		R.9.3 MKC's local policy should be strengthened to include blue green infrastructure, natural flood management, and consideration of wider benefits. Policies FR1 and NE4 of the Local Plan should be updated in future updates.	LPA	L	S	H	Will be addressed as part of future reviews of Plan MK	
	Sustainable Placemaking	R.9.4 MKC must incorporate long-term sustainability and Water Sensitive Urban design into its regeneration plans. Urban and landscape design must ensure buildings and infrastructure are located in areas at least risk of flooding.	MK-Futures-LPA	L	S	H	The MK 2050 Futures Strategy is in progress and this covers water management strategy at a high level. The specific policy that needs to sit below this to ensure sustainable designs (i.e. that referred to in this recommendation) can be addressed through the statutory review of PlanMK.	Cllr Gowans (planning) & Cllr Darlington (flood risk)
		R.9.5 MKC should provide clarity within local policies when referring to updated 'national policy and guidance' and should signpost key local policy documents. Examples include policies FR1 and FR2 of the Local Plan where such national policies and guidance documents are not clearly referenced. Key local documents that should be signposted are outlined in Table 10.1).	LPA	L	S	L	Will be addressed as part of review of PlanMK	
		R.9.6 MKC should reflect recent changes in terminology across relevant planning policy documents. This will promote improved and consistent understanding for all audiences. For example, the Updated Flood Map for Surface Water (uFMFSW) is now known as the Risk of Flooding from Surface Water (RoFSW). Similarly, DG5 registers are now termed hydraulic risk registers.	MKC Integrated	L	S	L	Will be addressed as part of review of PlanMK	
	Managing and reducing flood risk	R.9.7 MKC should incorporate the provision of pre-application support into its LFRMS. Specifically, MKC ought to reflect this within its role and responsibilities as an LLFA and include within Measure 1.3: 'Ensure drainage infrastructure for new development is future proofed for its design life'. The benefits to the developer (i.e. cost-savings, reduced risk of delays) should be clearly outlined to enhance uptake.	LLFA	L	S	M	Pre-application advice already takes place as part of a holistic LPA services. This will be reviewed for ways it can be adapted/improved/increased/made more efficient.	Cllr Darlington
		R.9.8 MKC must improve use of the SWMP outputs to facilitate an increasingly stringent and holistic approach to flood risk management in new development. As highlighted within the LFRMS, this ought to include: <ul style="list-style-type: none"> Consideration of Critical Drainage Catchments (CDCs) within planning applications to identify multiple or interlinked sources of flood risk; flood depth and extent; flood hazard; potential impacts on people, properties and critical infrastructure; groundwater flood risk; significant underground linkages and cross-boundary linkages. Use of the 'Measures Opportunity Assessment' as developed within the SWMP, to inform the types of SuDS which can be used, as part of the pre-application phase. 	LLFA	L	S	M	This will be looked into within the timescale suggested.	Cllr Darlington
		R.9.9 It is recommended that MKC increase the number of LLFA staff including an experienced practitioner to coordinate, manage and lead the team. A full assessment of MKC's capability and resource needed to deliver the statutory requirements of the F&WMA, and the wider remit of flood risk and drainage management, should be undertaken	LLFA	M	I	H	A Service Legal Agreement exists for MKC to buy in support from another experienced LLFA to assist (up to 1 full time equivalent post). A longer term plan is also being developed. A second flood risk officer started with the council in September 2019.	