

Flood risk emergency plans for new development

A guide for planners: How to consider emergency plans for flooding as part of the planning process



Woman being carried through floodwater by emergency services staff

Introduction

What does this guide cover?

It aims to inform decisions about whether development proposed in areas of flood risk will be safe in relation to emergency plans (EPs) and access and escape routes. The guide encourages the production of more detailed local guidance to:

- make the most efficient use of emergency planning resources
- minimise the need to consult
- drive up the quality and consistency of proposals
- minimise delays

Where such local guidance is absent, this guide can form the basis for assessing proposals. It includes guidance on:

- [Roles and responsibilities](#)
- [Planning policy context](#)
- [The role of emergency plans](#)
- [The content and structure of emergency plans](#)
- [Reviewing and agreeing emergency plans](#)
- [Flow diagram](#)
- [Emergency plan checklist](#)

Developers should give early consideration to the implications of flooding for emergency planning. Pre-application consultation should be undertaken as necessary, in line with the roles and responsibilities set out below. Some organisations, such as the Environment Agency, will need to charge for detailed planning advice.

Who is this guide for?

The guide is for local planning authorities (LPA) as the decision makers for planning applications. It may also help developers and their:

- planning advisors
- flood risk assessment (FRA) consultants
- architects and landscape designers
- highways engineers

The guide may also be useful for:

- local authority emergency planning teams
- the emergency services
- local resilience forums (LRF)
- [risk management authorities](#) (RMAs)

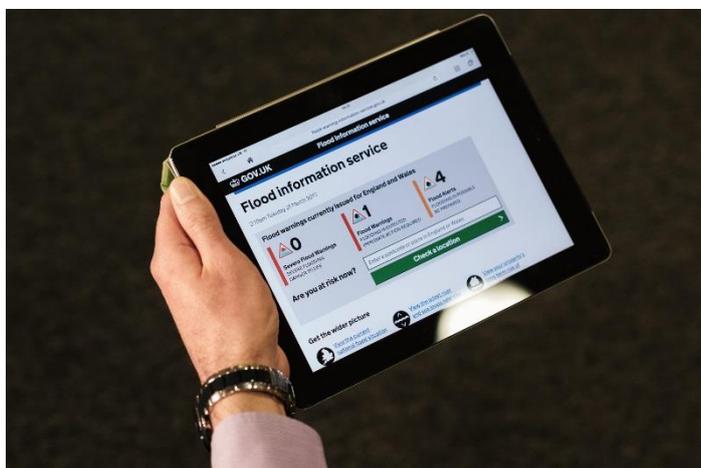
Roles and responsibilities

Local planning authorities - LPAs are the determining body for planning applications. They must decide whether development proposed in areas of flood risk is acceptable. Where an EP is needed, the LPA will have to form an overall view of its adequacy and be satisfied it can be safely and reasonably achieved before determining the planning application. It is not appropriate to defer consideration of emergency planning matters using pre-commencement planning conditions. The wider local authority is a category 1 responder under the Civil Contingencies Act.

Environment Agency - The EA is a statutory consultee. They will review the accuracy of the FRA and check information on the characteristics of the predicted flooding, such as the flood hazard, speed of onset, duration, depth, flood alert/warning availability and residual risks.

The EA can advise on key flood risks and whether there are any significant omissions, but are not able to comment on the overall adequacy of an EP. Forming this overall view relies on the input of other key parties such as emergency planning teams who play a more central role on access, escape and evacuation during flooding.

The EA is a Category 1 responder and has a role in flood forecasting and issuing flood warnings for fluvial, tidal and groundwater flooding by email, phone and text message.



Flood warnings available by phone, email or text message

Local authority emergency planning teams – Local authorities are category 1 responders under the Civil Contingencies Act. Their emergency planning teams work closely with the emergency services and partner organisations to help prepare plans and respond to emergencies. They are not statutory consultees and have no explicit statutory requirement to approve or deliver EPs. However the Planning Practice Guidance is clear that they should be consulted by the LPA and can advise on proposals that have emergency planning implications for flood risk.

By providing expert advice on emergency plans, emergency planning teams can help to reduce risk to life and limb whilst ensuring new development doesn't diminish the emergency response for existing communities.

Local resilience forums (LRFs) - Under the Civil Contingencies Act 2004 (Contingency Planning) Regulations 2005 and accompanying statutory guidance entitled "Preparing for Emergencies", the LRF is the main mechanism for multi-agency co-operation, especially between Category 1 and Category 2 responders. The LRF is concerned with the overall

direction and policies for emergency planning and preparation. They are not a statutory consultee but where proposals like local plans or large scale development may affect the emergency services or other relevant partners, the LPA can contact the LRF to seek joined up input by relevant partners, including in relation to the need for additional flood response infrastructure as a result of planned development.

Find your local LRF by visiting [Local resilience forums: contact details](#).

By co-ordinating advice on local policies and strategic development proposals, LRFs can make sure the relevant partners are co-operating to create and implement robust and efficient policies and procedures, whilst ensuring future development won't diminish emergency response provision as a whole.

Emergency services - The emergency services are Category 1 responders and members of the LRF. They are not statutory consultees and have no statutory requirement to approve or deliver EPs.

However, the Planning Practice Guidance is clear that they should be consulted in some cases and can advise on planning proposals that have emergency planning implications or that would increase the burden on the emergency services.

Where new development places reliance on the emergency services, the LPA can contact them to establish if the appropriate resources exist, or can be provided and, if not, what the cost of any additional resource would be.



Road closed by police due to flooding

The emergency services can benefit from providing advice on EPs by ensuring new development won't increase the burden on them during flooding and by influencing the design of routes in and out of new development sites to ensure emergency services staff won't be exposed to hazardous flooding when attempting to assist occupants/users of new development.

Building control - Building Regulations ([Approved Document B](#)) impose a requirement under B5 (1) to design and construct buildings to provide reasonable facilities to assist firefighters in the protection of life.

B5 (2) requires reasonable provision to be made within the site to enable fire appliances to gain access to the building. The context for what is 'reasonable' will partly be determined at the planning stage.

However the building regulations only apply to the access routes that lie on the proposed development site, not the access routes beyond the site boundary that may still be impeded by flooding.

It is not appropriate at planning application stage to defer consideration of emergency planning matters to building control.

Lead local flood authority (LLFA) - The LLFA is a statutory consultee for surface water drainage on proposals for major development. The National Planning Policy Framework (NPPF) and Planning Practice Guidance provide the basis to consider all sources of flood risk. As the lead authority for assessing and managing flood risk from ordinary watercourses, surface water and groundwater, LLFAs may be well-placed to provide advice on the adequacy of the assessment of these sources of risk in EPs.

Highways authority - As a statutory consultee the highways authority will need to be involved in highway design and drainage implications where access and escape influence the design of adopted highways – e.g. carriageway and footway levels.

Highways authorities are also Category 2 responders and members of the LRF.



Fire engine being driven through floodwater



Bridge damage in Tadcaster

Internal drainage boards (IDBs) – In some cases, water levels are managed by [IDBs](#) in internal drainage districts. IDBs are not statutory consultees, but can be a useful source of information and advice on flood risk from IDB-controlled watercourses for individual planning applications.

Planning policy context

National planning policy context - Flood risk policies are set out in the [NPPF](#) from paragraphs 155 to 165. An early emphasis is to avoid inappropriate development in areas at risk of flooding, ensuring it will be safe for its lifetime and that it will not increase flood risk elsewhere. NPPF paragraph 163 states:

163. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment⁵⁰. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) the development is appropriately flood resistant and resilient;
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) any residual risk can be safely managed; and
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

The flood risk and coastal change section of the [planning practice guidance](#) (PPG) adds that where risks are unavoidable through location and design options, applicants will need to demonstrate that safe evacuation procedures and flood response infrastructure are in place to manage the risk. Applicants should do this through their FRA and, where relevant through an agreed emergency plan.

The PPG states that applicants should provide evidence to demonstrate the proposed development would be safe for its lifetime and residual flood risk can be overcome to the satisfaction of the LPA, taking account of any advice from the Environment Agency.

Local policy context - For the LPA to establish whether appropriate evacuation procedures and flood response infrastructure would be in place for development proposals, it's critical that either:

- local policies and guidance on this issue are established and followed, and/or
- local consultation procedures are set up to ensure site-specific, quality and timely advice on this issue is sought **and** received by the relevant consultees

Establishing local policies or guidance on this issue is the preferred option as it will:

- make the most efficient use of emergency planning resources
- minimise the need to consult on individual applications
- drive up the quality and consistency of proposals
- provide clarity and more certainty for developers
- minimise delays

LPA's should lead on producing local policies and guidance on flood risk emergency plans for new development. They should be produced and agreed with the EA, LLFA, local authority emergency planning teams and the LRF. Local policies could form part of the Local Plan or be included in a Supplementary Planning Document (SPD). Local guidance could be free-standing or form part of the Strategic Flood Risk Assessment. When producing such policies or guidance, LPA's should consider working jointly with other LPA's to improve consistency and efficiency.

LPA's should establish **local consultation procedures** to ensure planning officers have clarity about who they should consult and what advice they should expect to receive. Procedures should be drawn up by the LPA and agreed between the EA, LLFA, emergency planning teams and the emergency services.

In the absence of local policies or guidance on this issue, the NPPF requirement for an emergency plan, relevant sections of the PPG and this guide, provide a default framework against which site-specific proposals may be judged.

LPA's, as decision makers for individual planning applications, are unlikely to be able to determine if a development would be safe throughout its lifetime if:

- they don't obtain expert advice on emergency planning and flood risk, either strategically or on a site-specific basis
- developers fail to provide suitable EPs

The role of emergency plans

What are the aims and objectives of emergency plans?

An emergency plan (EP) is a document developers submit with their planning applications where emergency response is an important component of the safety of the proposed development. It can be a free-standing document or form part of the FRA. It will very rarely be appropriate to use a planning condition to defer the provision of an EP to a later date, because it may show that the development cannot be made safe and therefore call into question whether the development is acceptable in principle.

An EP will need to demonstrate that:

- safe access and escape routes are included
- voluntary and free movement of people will be available during a design flood, taking climate change into account
- there is the potential for evacuation before a more extreme flood (a flood with an annual probability of 0.1%), taking climate change into account
- appropriate evacuation procedures and flood response infrastructure will be in place
- people will not be exposed to hazardous flooding from any source, now or in the future, including in an extreme flood event
- any residual risks remaining after other location and design measures have been incorporated, can be safely managed
- the relevant building regulations are capable of being complied with in relation to suitable on-site access for the fire service, within the constraints of any planning permission granted

It will also need to assess whether proposals would increase the number of people living or working in areas of flood risk and whether this would increase the likely scale of any evacuation and consequently the burden on the emergency services.

Also refer to the [emergency plan checklist](#).

EPs for outline planning applications will need to include sufficient detail on those aspects of the development that are key to establishing the principle of whether the development can be made safe throughout its lifetime. This is likely to include details on site layout, the location and level of key access and escape routes, proposed ground and finished floor levels and the location and design of any safe refuges required, insofar as they relate to emergency planning and the safety of the development.

Pre-application advice with RMAs, emergency planning teams and relevant emergency services should ensure a smoother planning application process by identifying and resolving issues early. If local policies or guidance are in place, it may just be a case of demonstrating how these local standards have been met.

When reviewing flood risk information and mitigation measures, the EA and others will want to see that every feasible option for avoiding, controlling, mitigating and managing all sources of flood risk has been taken, before considering access and escape measures in an EP.

Further guidance on what information should be provided with planning applications can be found in guidance on [flood risk assessment](#) and the Planning Practice Guidance including the [site-specific flood risk assessment checklist](#).

When will an emergency plan be required?

The NPPF, in footnote 50, sets out those circumstances where an FRA should be provided with planning applications.

An EP should be provided as part of the FRA, or as a separate document accompanying the FRA, if relevant pedestrian and/or vehicular access and escape routes of a proposed development would be affected during:

- a design flood from any source (with an appropriate allowance for climate change) with any existing flood risk management structures or features operating as intended
- a design flood from any source (with an appropriate allowance for climate change) with a failure of any relevant flood risk management structures or features

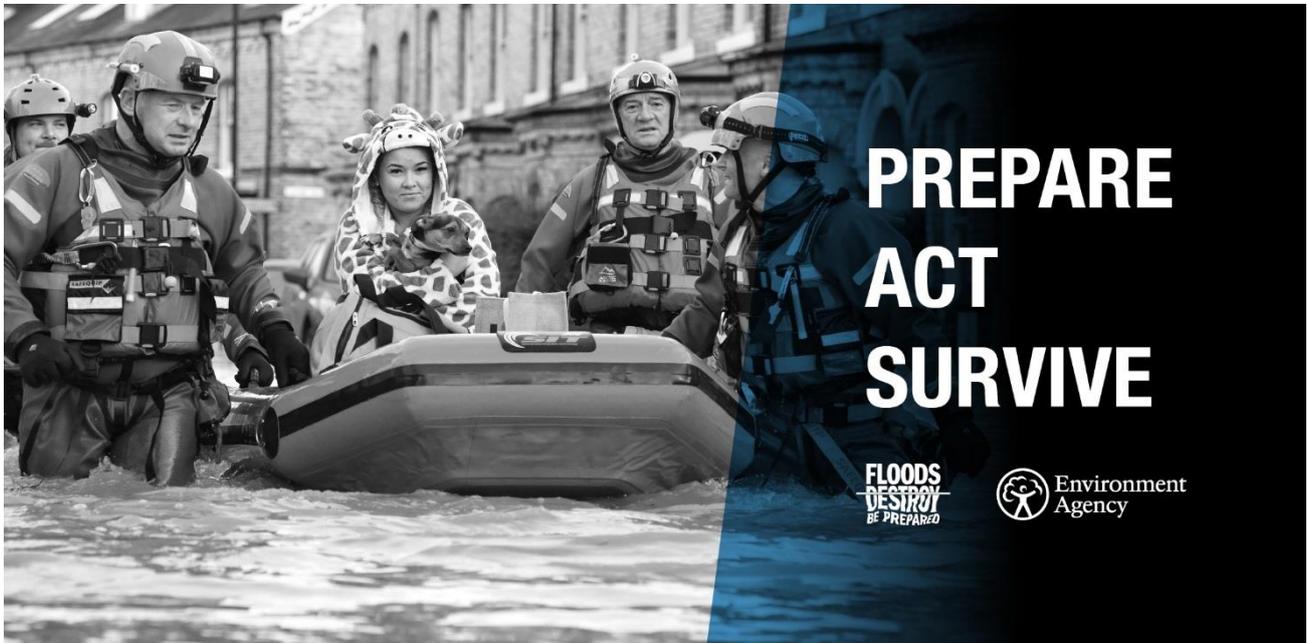
The above would apply even if the proposed buildings would not be affected by flooding.

An EP is also essential when vulnerable land uses with transient occupants are proposed in areas at risk of flooding. Such uses include holiday accommodation, hotels, caravan and camping sites or entertainment venues. Such occupants may not be aware of the risks or the warning systems, and may not have the local knowledge to respond safely.

LPAs should inform applicants when they consider an EP is needed.

When consulted, the EA and LLFA will normally advise if an EP (or appropriate information in an FRA) is absent, whilst the LPA makes the decision to require one.

The content and structure of emergency plans



What should an EP address?

EPs should:

- characterise and quantify the flood risk
- list relevant flood warnings and estimate the likely lead-time available
- detail who is at risk – including vulnerable people and transient users
- explain how the EP will be triggered, by who and when
- define any areas of responsibility for those participating in the EP
- describe what actions are required by the people in the development
- set out the type and performance of any flood resistance or resilience measures to be installed prior to a flood
- establish safe access and escape routes to a safe location
- outline the evacuation procedure, place of refuge and related equipment needed to serve occupants for the required duration



Environment Agency flooding campaigns

- detail what emergency service infrastructure and/or contributions are proposed
- establish procedures for implementing, monitoring and maintaining the plan throughout the lifetime of the development

What is safe access and escape?

Safe access and escape can be achieved through the provision of appropriate access and escape routes in conjunction with flood warnings. Specific measures include:

- access routes should allow occupants to safely access and exit the development in design flood conditions for all types of flooding, with an appropriate allowance for climate change
- vehicular access to allow the emergency services to safely reach the development during design flood conditions (with an appropriate allowance for climate change) will also normally be required
- wherever possible, access routes should be located above design flood levels (with an appropriate allowance for climate change) and should avoid overland flow and exceedance pathways
- where routes can't be designed to be dry and access is required through limited flood depths, signage should be provided
- evacuation triggers should be prior to the development flooding, wherever practical
- pedestrian routes should not be subject to any combination of depth and velocity that would result in a flood hazard rating¹ of 0.75 ('danger for some') or greater. Flood water can be difficult to walk through and can hide physical hazards like drain covers, open manholes and kerbstones
- vehicular routes, including for some emergency services vehicles, should not exceed 30cm (12 inches) – less if water is fast flowing - as vehicles can become buoyant and could be swept away in flood conditions. The public should not be expected to drive vehicles through flood waters as part of an EP
- some emergency services vehicles may be able to cope with slightly greater depths, but site-specific advice from the emergency services should be sought to confirm this
- routes which are subject to a flood hazard rating of more than 2.0 ('danger for all') would be unsuitable for the emergency services

How should climate change be considered?

The PPG sets out how the planning system should help minimise vulnerability and provide resilience to the impacts of climate change over the lifetime of the development.

Applicants should use their FRA to assess how climate change will impact on the flood risk to the site over the lifetime of the development by following the EA's [Flood risk assessments: climate change allowances](#). Applicants should also refer to LPA strategic

¹ See [FD2320 Flood risk assessment guidance for new development](#), 2005 for information about how to calculate flood hazard, particularly Table 13.1 of Technical Report 2 and its Explanatory Note.

flood risk assessments as they may provide valuable information about the impacts of climate change on all sources of flood risk.

EPs should then take account of the predicted impacts of climate change when proposing evacuation procedures, e.g. changes to the extent and nature of flood risk affecting access and escape routes and safe refuges for the design flood. Climate change should also be taken into account when assessing and managing residual risks.

How should reservoirs be considered?

The PPG advises that LPAs consult with their emergency planning teams as early as possible where planning applications may have implications for emergency planning, such as sites located within an area at risk of reservoir failure. Where strategic issues affecting emergency services are identified by them or in SFRAs, it may also be relevant to contact the LRF which coordinates preparation for local incidents and catastrophic emergencies through its multi-agency flood plan.



Garreg Ddu reservoir, Elan Valley, Wales

LPAs are also advised to consult with the owners/operators of raised reservoirs (as may be obtained from the LLFA and from the EA's [Long Term Flood Risk maps](#)), to establish potential safety issues arising from development. EPs will need to demonstrate that residual risks can be safely managed and to provide owners/operators the opportunity to highlight any impacts of development on the construction, management or maintenance of the reservoir.

Can the emergency services just be relied upon?

The PPG recommends that the emergency services are unlikely to regard a development as safe if it increases the scale of any rescue that might be required. Additional burdens on the emergency services can increase the risk to existing communities that are already reliant on emergency services provision.

Developers should therefore be expected to demonstrate that the proposed development will result in no net increase in the burden on rescue services, by proposing a self-sufficient design in the FRA and EP. Where the LPA, taking



People winched to safety from floodwaters by helicopter. Cattle remain in water.

account of advice from the emergency services, considers it acceptable for a new development to increase this burden, the developer should be expected to cover the full cost of any additional emergency services provision needed. This may be secured through accompanying [section 106 obligations](#), or where relevant, [Community Infrastructure Levy](#) (CIL).

How should residual risks be considered?

FRAs should assess the residual risk of flooding should relevant flood risk management structures or features fail or their design standard be exceeded (taking climate change into account), and determine whether relevant pedestrian or vehicular routes would be affected.



Helicopter rescues in Cockermouth, Cumbria

regarded as safe if it requires evacuation from an area that could be flooded by a sudden failure of flood defences with little or no warning, resulting in hazardous² flooding. This is particularly important if the resultant speed-of-onset of flooding may prevent safe evacuation away from the area of risk, and the duration of flooding would prevent vehicular access by the emergency services for an unacceptably long period. In such cases,

If not, an EP will be required. Residual risks in this context could also include a failure in the issue, transmission or receipt of flood warnings, or the failure of people to respond appropriately. The successful issuing of a flood warning cannot be guaranteed. EPs will need to demonstrate that residual risks can be safely managed.

Mapping showing the extent and nature of the flooding that may result from the failure of defences or their design standard being exceeded, may be available from the EA or in LPA Strategic Flood Risk Assessments. This information should inform FRAs. If this information isn't available, the applicant may need to undertake detailed modelling as part of the FRA.

Proposals that are likely to increase the number of people living or working in areas of residual flood risk, require careful consideration, as they could increase the scale of any evacuation required.

The LPA needs to make an informed judgement on whether a proposal can be

² See [FD2320 Flood risk assessment guidance for new development](#), 2005 for information about how to calculate flood hazard, particularly Table 13.1 of Technical Report 2 and its Explanatory Note. Supplementary information may be needed on the impact of waves and spray on flood hazard, where relevant.

development should also be provided with an internally accessible and suitably sized and designed place of refuge above predicted flood levels, where occupants can seek temporary refuge for the duration of flooding.

Such places of refuge can also play an important role where, for whatever reason, evacuation in advance of flooding is not achieved. Places of refuge should be designed to facilitate rescue in case emergency care is needed or if it's unlikely to be safe for occupants/users to wait until flood waters have receded sufficiently. Internal places of refuge are unlikely to be appropriate for long duration flooding, accounting for the potential impact on services like electricity, gas, telecommunications, water supply and sewerage.



Cheshire Lines flood defence breach near Ormskirk

What if development is proposed in an area that may be affected by widespread flooding?

Some areas could be affected by widespread flooding. This could include low lying areas at risk of fluvial, tidal or surface water flooding. The practicality of safe evacuation from such areas will depend on:

- the type of risk present and whether advance flood warning can be given
- the number of people likely to be impacted by an evacuation from the area
- the potential for keeping the EP updated and disseminated throughout the lifetime of the development
- the adequacy of evacuation routes and identified places that people could seek refuge (taking account of the speed of onset of flooding and the length of time the evacuation may need to last)
- detailed and up-to-date multi-agency flood plans being in place for the locality



Flooding in Tewkesbury, Gloucestershire

Reviewing and agreeing emergency plans

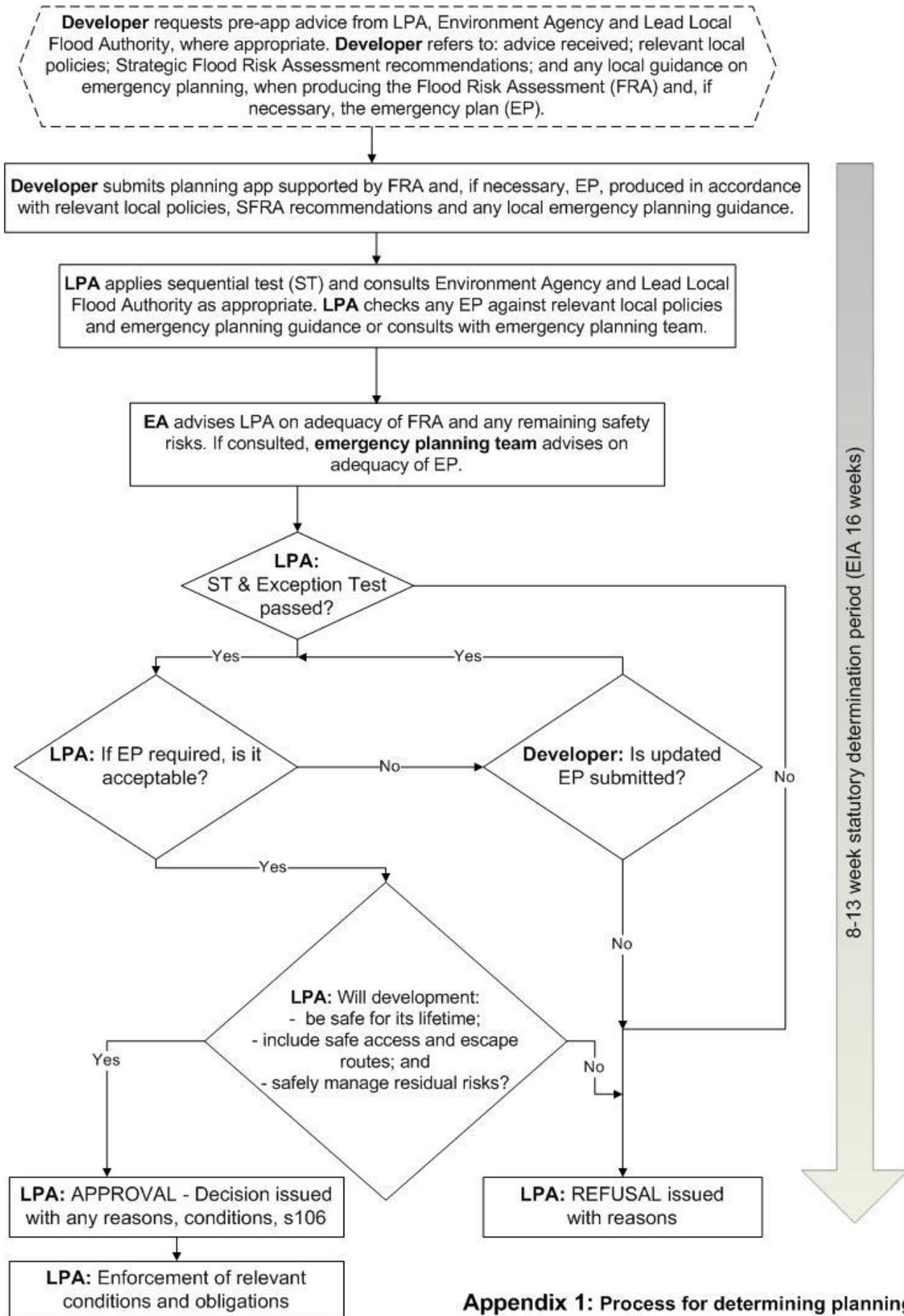
Once the LPA has decided upon the need for an EP and obtained one, specialist advice is normally needed to inform the LPA decision on whether to agree the EP (as described in NPPF paragraph 163e) and whether the development satisfies the national policy that it should be safe throughout its lifetime without increasing flood risk elsewhere. This specialist advice may be obtained through either:

- site-specific consultation, in-line with an agreed local consultation procedure, or
- applying local policies or guidance as set out in a Local Plan, relevant SPD or Strategic Flood Risk Assessment, or
- a combination of both

If any specific emergency plan measures, additional emergency services resources or off-site flood response infrastructure are needed to ensure the development will be safe, these should be secured on any planning permission granted, using planning conditions and/or s106 obligations. There may also be a role for community infrastructure levy if the need for this infrastructure has been identified strategically.

Where the LPA concludes that an EP is inadequate or it fails to demonstrate that a development can be regarded as safe throughout its lifetime, and the applicant has failed to resolve these issues by amending the EP, planning permission should be refused.

[End of guide – Appendices below]



Appendix 1: Process for determining planning applications requiring an emergency plan

Appendix 2: Emergency plan (EP) checklist

Section 1. Scope, Objectives and background

- Explain the reason for making an EP.
- Provide the purpose of the plan – aims, objectives.

Check

Section 2. Location and proposal

- Provide a site description, location and layout plans, and proposed land use.
- Outline the presence of critical infrastructure and potentially vulnerable people.
- Show access and escape points.

Check

Section 3. Risk Summary

- Outline the source/s of flooding and presence of flood risk areas (tidal, fluvial, pluvial and groundwater), including flow paths.
- For both the pre and post development situation, assess each source of flooding, including its depth and speed in different scenarios including infrastructure failure and exceedance, taking account of climate change.
- Define the flood hazard³ people will be exposed to on access and escape routes, including internal routes to any temporary refuges in the event of fast-onset flooding such as from a flood defence breach.
- Consider the possibility of risks from debris in flood water.
- Provide a brief explanation of the factors leading to flooding, i.e. heavy rainfall, failure/exceedance of certain assets, river flooding, surface water flooding etc.

Check

Section 4. Mitigation Measures

- Assessment of potential avoidance, control, management and mitigation measures and products to prevent, delay or minimise flooding.
- Include detail on the ongoing operation and upkeep of any measures.
- Assess the need and benefit of implementing or purchasing products to lessen the threat and impact of flooding to the site.

³ See [FD2320 Flood risk assessment guidance for new development](#), 2005 for information about how to calculate flood hazard, particularly Table 13.1 of Technical Report 2 and its Explanatory Note.

- Detail how such measures can/will be put into place.

Check

Section 5. Flood warnings and associated actions

- There should be an explanation of Flood Warnings available for the site and how the Floodline operates, with contact numbers within the EP. Note that the EA's flood warnings are only in relation to tidal, fluvial and groundwater flooding, and do not cover other sources of flooding such as surface water flooding.
- It is crucial to fully explore the variety of flood warnings available to a specific development.
- The EA provides a number of methods for receiving flood warnings. It is also useful to understand the likely lead-time for flood warnings. Other sources of warning include flood wardens, sirens and the media.
- If there are no appropriate existing flood warnings, what additional provision of flood warning for all sources will be made? This may involve things like improvements to forecasting or the provision of additional gauges, telemetry or alarms.
- There should be a clear statement that the occupants/organisation, including successive tenures, will sign up to the Floodline service. Businesses should clearly identify a point-of-contact for receiving the warnings.
- Outline actions and procedures for all parties upon receiving flood alerts and warnings and any further dissemination of the information.

Check

Section 6. Safe access and escape

- Safe access to and from the development should be clearly identified with evacuation routes shown on a map.
- When will evacuation procedures be planned and put in place for each relevant source of flooding? Will this only be in advance of the onset of flooding or will evacuation continue until the point flood waters start to pose a hazard to the identified routes?
- What circumstances will trigger an evacuation for each relevant source of flooding?
- Will there be an alarm system and how will evacuation be organised?
- How will people reach assembly points, refuge/reception centres? Will this differ depending on the source of flooding?
- Will the route(s) be signposted?

- Both during and after the evacuation, how will the welfare of people be looked after, including those with special needs?

Check

Section 7. Temporary refuge

- Provide details of the location and type of refuge onsite or offsite, along with facilities and equipment that will be provided.
- Provide details of any management and staffing of such a refuge.
- If on-site refuge is considered appropriate, the place of refuge should be well above the predicted flood level such that it is dry and this should include an allowance for climate change and any breach of defence scenarios. Refuges should be designed to provide adequate shelter in all conditions for the likely flood duration, accounting for loss of utilities.
- Provide the expected duration of flooding on site if a temporary refuge option is considered and state the maximum refuge duration for a range of occupants, including those with health or mobility issues.
- Any places of refuge should be clearly identified in the EP and all staff/occupants and residents made aware of this location and operation.
- Refuge facilities must remain accessible (including to mobility-impaired), potentially operational and be properly equipped to function, for the lifetime of the development.
- Could rescue by emergency services be feasible from the refuge in a long duration flood or in case of a medical emergency?

Check

Section 8. After the flood

- Provide procedures for post-flood recovery and repatriation where properties are identified as being at risk. This could include proposals for cleaning, drying, repairing and re-occupation.
- Estimated time taken for return to normal use.
- Include clean-up, drying and repair times and the time to re-establish services.

Check

Section 9. List of roles

- List the roles and responsibilities of all relevant parties, including occupants. State how awareness of such duties will be ensured and passed on to successive tenures.

Check

Section 10. Plan upkeep and awareness

- Education on dangers of flood water and debris.
- Exercise/test/practise of plan and evacuation.
- Monitoring and review of the plan, with responsibility for plan maintenance and dissemination.

Check