

London Borough of Southwark

Local Flood Risk Management Strategy 2023 - 2029

Habitats Regulations Assessment



Executive summary

A Habitats Regulations Assessment Screening Report has been undertaken to assess the potential impacts to specific natural environments when delivering the Local Flood Risk Management Strategy (LFRMS). These specific natural environments include sites which are designated under the Conservation of Habitats and Species Regulations (2017) and are referred to as European Sites or Natura 2000 Sites. Included under this designation are Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar Sites.

This Screening Report has determined which European sites should be considered within this investigation. This is based on hydro-connectivity and their proximity to Southwark. No sites are situated within the Southwark borough boundary however four sites external of the borough have been included in this assessment. These are:

- Site 1: Wimbledon Common – SAC
- Site 2: Richmond Park – SAC
- Site 3: Epping Forest – SAC
- Site 4: Lee Valley – SAC & Ramsar

The proposed LFRMS strategic objectives and their associated actions have then been assessed against each site. This is to establish whether there are likely to be any significant negative impacts to these sites caused by the delivery of the LFRMS.

No negative impacts were found to be likely by the delivery of the LFRMS strategic objectives and their associated actions. A harmful effect could include disruption to the natural processes within the site, a reduction in the amount or quality of designated habitats or species, or a limitation to the potential of restoring the designated habitats or species in the future.

The delivery of the LFRMS is instead likely to offer potential enhancement for these designated sites both directly and indirectly. Offering benefits to the designated sites by enhancing their quality or supporting further awareness and/or protections. It is therefore concluded that the HRA for the LFRMS does not require progression onto later tasks and does not require a full assessment.

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Abbreviations

Abbreviation	Definition
HRA	Habitats Regulations Assessment
LFRMS	Local Flood Risk Management Strategy
LLFA	Lead Local Flood Authority
Ramsar	Ramsar sites are wetlands of international importance designated under the Ramsar Convention.
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SINC	Site of Importance for Nature Conservation
Southwark borough	The geographical area known as the London Borough of Southwark.
Southwark Council	The local authority who governs the London Borough of Southwark.
SPA	Special Protection Area
Statutory Consultees	Natural England

1. Introduction

1.1 Purpose of screening

The purpose of conducting this Habitats Regulations Assessment (HRA) Screening Report is to assess any potential risks to habitats which may be caused by the delivery of the Local Flood Risk Management Strategy (LFRMS) within Southwark and the surrounding area.

This investigation is required under the [Conservation of Habitats and Species Regulations \(2017\)](#) known also as Habitats Regulations. This legislation explains that a HRA must be conducted to investigate whether a plan or proposal will cause any significant harm to designated European Sites (also known as Natura 2000 sites). These European Sites include designated and proposed Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. Some of these sites may lie outside the borough boundary and are included because they are hydrologically linked.

Additional areas such as locally important sites including, but not limited to, Sites of Importance for Nature Conservation (SINCs), have not been included within this screening analysis. This is because these types of sites are not included under the legislation which governs a HRA, and therefore are not required to be assessed in this report.

Screening is conducted to determine if there will be a significant negative impact to any European Sites when delivering the LFRMS. If there is found to be a significant negative impact, then progression onto later stages of the HRA process will be required including potential monitoring actions.



Figure 1-1 Photograph of deer in Richmond Park a registered SAC
(Credit: Southwark Council)

1.2 Local Flood Risk Management Strategy

LFRMS summary

The Southwark LFRMS presents how the Lead Local Flood Authority (LLFA) will deliver flood risk management. This is based on the local flood risk for Southwark and is supported by outputs from other strategic documents. In conjunction with the LFRMS a detailed action plan has been produced listing actions the LLFA will take to manage flood risk. A Strategic Environmental Assessment (SEA) Screening Report has also been completed alongside this HRA Screening Report.

LFRMS strategic objectives

The LFRMS has produced a set of four strategic objectives:

- A. To improve community awareness of local flood risks and the authorities responsible for managing them.
- B. To collaborate with internal departments, organisations, authorities and partnership groups to support successful communication in managing flood risk.
- C. To support development across Southwark encouraging the integration of SuDS within planning designs to promote sustainable multi-beneficial solutions that contribute to wider social, economic and environmental outcomes.
- D. To apply knowledge on local flood risk to assist in improving Southwark's resilience to the impacts of climate change.

Within this document, the LFRMS strategic objectives have been assessed in *Screening analysis* against each of the designated European Sites identified to examine if these objectives and their associated actions will have any potential effects on these areas.

1.3 HRA Screening Report methodology

A full HRA is separated into three tasks, a summary of this is set out in *Table 1-1*.

Table 1-1 Summary table of stages in delivering an HRA

HRA Tasks	Task aims
Task 1: Screening	To check if the strategy, plan, or proposal is likely to have a significant effect on a European site's conservation objectives.
Task 2: Appropriate Assessment	To assess the likely significant effects of the proposal in more detail and identify ways to avoid or minimise any effects.
Task 3: Derogation	To consider if proposals that would have an adverse effect on a European site qualify for exemption.

This document will complete Task 1 of the HRA process and determines if progression onto the later tasks will be required further assessment of the LFRMS. This report has undergone a statutory consultation and a public consultation in order to have its assessment and outputs scrutinised. The statutory consultee for the HRA is Natural England.

1.4 Consultation process

The HRA Screening Report is required to undergo both a statutory consultation and a public consultation. The consultation questions set out in *Section 1.5* were asked to the statutory consultees, whereas for the general public consultation a set of overarching questions were provided as part of the consultation strategy that was produced to support the LFRMS. The public consultation took place in Summer 2023. Following the consultations the feedback was reviewed and appropriate changes made to the HRA and other LFRMS documents as necessary.

1.5 HRA consultation questions

Identifying relevant sites

1. Do you feel we have included all of the most relevant Natura 2000 sites which may be significantly affected by the implementation of the Local Flood Risk Management Strategy? If not, please state other sites which you believe we have missed.
2. Do you feel we have included all relevant information for these sites?

Screening analysis

3. Do you have any comments on the method for the assessment of the HRA sites against the Local Flood Risk Management Strategy strategic objectives?
4. Do you agree with the screening analysis for each of the objectives? If not, please give reasons as to why you would screen a certain objective differently.

Conclusions and further comments

5. Do you have any comments on the conclusions that we have made in this HRA Screening Report of the Local Flood Risk Management Strategy?
6. Do you have any additional comments or suggestions for this HRA Screening Report?



2. Site identification

2.1 Introduction to the sites

The first stage of the HRA Screening process is to determine which European Sites lie within the Southwark borough boundary, followed by those which are in close enough proximity that they may also be affected by the actions of the LFRMS. A distance of 10km has been chosen, in line with the HRA produced for Southwark's Local Plan, and any sites which fall within this area will be included within *Section 2.3*.

Information for the site identification stage of the HRA Screening Report has been collated from the following sources:

- [Natural England](#)
- [Joint Nature Conservation Committee \(JNCC\)](#)
- [DEFRA's Magic Map facility](#)

A map displaying all the sites investigated is also shown in *Figure 2-1*.

2.2 Sites within the Southwark borough boundary

There are no designated European Sites of ecological importance (Natura 2000 sites) within or partially within the Southwark borough boundary.

2.3 Sites in proximity to the Southwark borough boundary

There are four sites which are within or partially within a 10km distance of the Southwark borough boundary.

These are:

- Site 1: Wimbledon Common
- Site 2: Richmond Park
- Site 3: Epping Forest
- Site 4: Lee Valley

A full breakdown of information is displayed within the following tables for each designated site respectively. This covers the qualifying habitats and species for the designation and the pressure and/or threats facing them.

Table 2-1 Wimbledon Common SAC (Site 1) information

Site name	Wimbledon Common
Site designation	SAC
EU code	UK0030301
Area (ha)	351.38
Qualifying species and/or habitat features	<ul style="list-style-type: none"> • H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> • H4030 European dry heaths • S1083 Stag beetle, <i>Lucanus cervus</i>
General site character	<ul style="list-style-type: none"> • Inland water bodies (Standing water, Running water) (1%) • Bogs, Marshes, Water fringed vegetation, Fens (0.5%) • Heath, Scrub, Maquis and Garrigue, <i>Phygrana</i> (5%) • Dry grassland, Steppes (45%) • Improved grassland (3.5%) • Broad-leaved deciduous woodland (45%)
Current pressure and/or threats	<ol style="list-style-type: none"> 1. Public access / disturbance, affecting H4010, H4030, S1083 2. Habitat fragmentation, affecting S1083 3. Invasive species. affecting H4010, H4030, S1083 4. Air pollution (impact of atmospheric nitrogen deposition), affecting H4010 and H4030
Supplementary evidence	European Site Conservation Objectives for Wimbledon Common SAC - UK0030301 Site Improvement Plan – Wimbledon Common Wimbledon Common - Special Areas of Conservation

Table 2-2 Richmond Park SAC (Site 2) information

Site name	Richmond Park
Site designation	SAC
EU code	UK0030246
Area (Ha)	846.27
Qualifying species and/or habitat features	<ul style="list-style-type: none"> • S1083 Stag beetle, <i>Lucanus cervus</i>
General site character	<ul style="list-style-type: none"> • Inland water bodies (Standing water, Running water) (1.5%) • Bogs, Marshes, Water fringed vegetation, Fens (0.5%) • Heath, Scrub, Maquis and Garrigue, Phygrana (25%) • Dry grassland, Steppes (18%) • Humid grassland, Mesophile grassland (5%) • Improved grassland (20%) • Broad-leaved deciduous woodland (25%) • Mixed woodland (5%)
Current pressure and/or threats	No current pressures and/or threats affecting the Natura 2000 feature(s) have been identified on this site.
Supplementary evidence	European Site Conservation Objectives for Richmond Park SAC – UK0030246 Site Improvement Plan – Richmond Park Richmond Park - Special Areas of Conservation

Table 2-3 Epping Forest SAC (Site 3) information

Site name	Epping Forest
Site designation	SAC
EU code	UK00012720
Area (Ha)	1604.95
Qualifying species and/or habitat features	<ul style="list-style-type: none"> • H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i>; Wet heathland with cross-leaved heath • H4030 European dry heaths • H9120 Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>); Beech forests on acid soils • S1083 Stag beetle, <i>Lucanus cervus</i>
General site character	<ul style="list-style-type: none"> • Inland water bodies (Standing water, Running water) (6%) • Bogs, Marshes, Water fringed vegetation, Fens (0.2%) • Heath, Scrub, Maquis and Garrigue, Phygrana (3.8%) • Dry grassland, Steppes (20%) • Broad-leaved deciduous woodland (70%)
Current pressure and/or threats	<ol style="list-style-type: none"> 1. Air pollution (impact of atmospheric nitrogen deposition), affecting H4010, H4030, H9120 2. Undergrazing, affecting H4010, H4030 3. Public access / disturbance, affecting H4010, H4030, H9120 4. Changes in species distributions, affecting H9120 5. Inappropriate water levels, affecting H4010 6. Water pollution, affecting H4010 7. Invasive species, affecting H4010, H9120 8. Disease, affecting H9120
Supplementary evidence	European Site Conservation Objectives for Epping Forest SAC - UK0012720 Site Improvement Plan - Epping Forest Epping Forest - Special Areas of Conservation

Table 2-4 Lee Valley SPA & Ramsar (Site 4) information

Site name	Lee Valley
Site designation	SPA & Ramsar
EU code	UK9012111
Area (Ha)	447.87
Qualifying species and/or habitat features	<ul style="list-style-type: none"> • A021 Botaurus stellaris; Great bittern (Non-breeding) • A051 Anas strepera; Gadwall (Non-breeding) • A056 Anas clypeata; Northern shoveler (Non-breeding)
General site character	<ul style="list-style-type: none"> • Bogs, Marshes, Water fringed vegetation, Fens (4.0%) • Other land (including Towns, Villages, Roads, Waste places, Mines, Industrial sites) (1.0%) • Inland water bodies (Standing water, Running water) (67.0%) • Humid grassland, Mesophile grassland (8.0%) • Improved grassland (10.0%) • Broad-leaved deciduous woodland (10.0%)
Current pressure and/or threats	<ol style="list-style-type: none"> 1. Water pollution, affecting A021, A051, A056 2. Hydrological changes, affecting A021, A051, A056 3. Public access/ disturbance, affecting A021, A051, A056 4. Inappropriate scrub control, affecting A021, A051, A056 5. Fisheries: Fish stocking, affecting A021, A051, A056 6. Invasive species, affecting A021, A051, A056 7. Inappropriate cutting/ mowing, affecting A021 8. Air pollution (risk of atmospheric nitrogen deposition), affecting A021
Supplementary evidence	European Site Conservation Objectives for Lee Valley SPA - UK9012111 Site Improvement Plan - Lee Valley Lee Valley – Special Protection Area & RAMSAR

2.4 Identified relevant sites consultation questions

1. Do you feel we have included all of the most relevant Natura 2000 sites which may be significantly affected by the implementation of the Local Flood Risk Management Strategy? If not, please state other sites which you believe we have missed.
2. Do you feel we have included all relevant information for these sites?

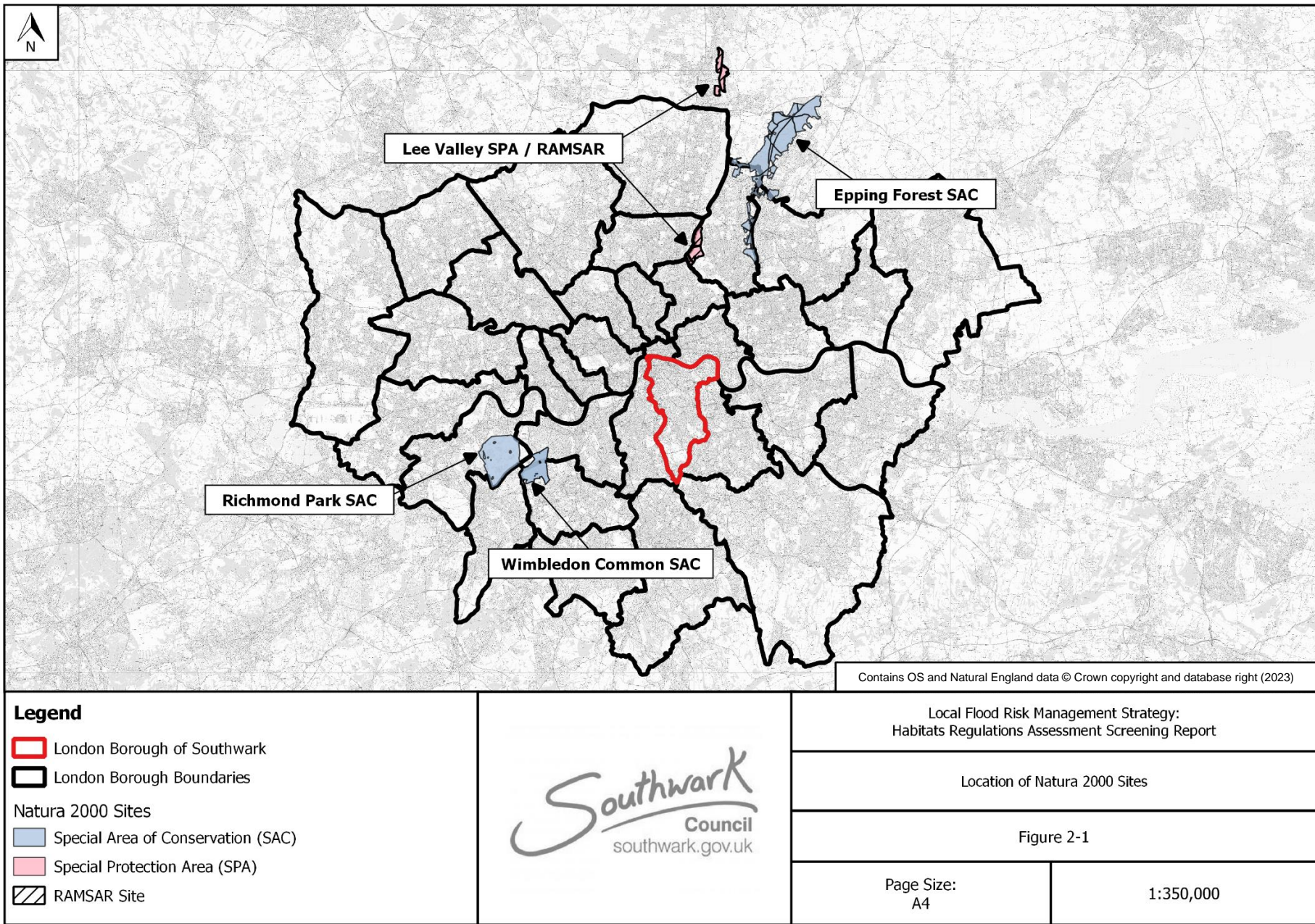


Figure 2-1 Map of selected Natura 2000 sites

3. Screening analysis

3.1 Screening analysis summary

The purpose of the screening analysis is to assess whether there will be any significant effects to any of the designated sites identified in *Section 2*. To determine this each of the LFRMS strategic objectives will be critiqued against each site individually to determine if the delivery of the LFRMS will cause a negative effect to the site. This will then inform a decision on whether progression onto the later stages of the HRA are necessary.

3.2 Screening analysis

Table 3-1 presents the results of the analysis between the LFRMS strategic objectives and the HRA sites. *Table 3-2* explains the criteria coding used within the scoring matrix. No negative effects are considered to be posed from the delivery of the LFRMS strategic objectives to the HRA sites. Evidence and justification to support these conclusions has been summarised in *Section 3.3*.

Table 3-1 Screening analysis results of HRA sites against LFRMS Strategic Objectives

		HRA Site Number			
		1	2	3	4
LFRMS Strategy Objective	A	0	0	0	0
	B	0	0	0	0
	C	0	0	0	0
	D	0	0	0	0

Table 3-2 Screening analysis criteria summary

0	The strategic objective will have no effect on a Natura 2000 site.
-	The strategic objective could have a potential negative effect on a Natura 2000 site.
--	The strategic objective could have a potential significant negative effect on a Natura 2000 site.
?	Uncertain

3.3 Screening analysis outcomes

LFRMS strategic objective A

To improve community awareness of local flood risks and the authorities responsible for managing them.

Outcome: No negative effect

There is not expected to be a negative effect from the delivery of LFRMS strategic objective A and its actions. Reasons for this are as follows:

- Improving community awareness will encourage greater environmental stewardship from individuals.
- Better understanding of the flood risk will help to protect these sites from the negative impacts of flooding.
- Supporting community engagement on flood risk could offer additional opportunities for environmental or conservation work.
- Encouraging residents to manage their own flood risk through measures including, de-paving and increasing landscaped areas in private gardens.

LFRMS strategic objective C

To support development across Southwark encouraging the integration of Sustainable Drainage Systems (SuDS) within planning designs to promote sustainable multi-beneficial solutions that contribute to wider social, economic and environmental outcomes.

Outcome: No negative effect

There is not expected to be a negative effect from the delivery of LFRMS strategic objective C and its actions. Reasons for this are as follows:

- Taking leadership in influencing development to provide better environmental outcomes could impact behaviour in regions where these HRA sites are sited.
- Utilising best practice in improving the natural environment could encourage other authorities to do the same in areas where these HRA sites are sited.

LFRMS strategic objective B

To collaborate with internal departments, organisations, authorities, and partnership groups to support successful communication in managing flood risk.

Outcome: No negative effect

There is not expected to be a negative effect from the delivery of LFRMS strategic objective B and its actions. Reasons for this are as follows:

- This objective aims to improve communication between organisations has potential to support the protection of these sites.
- Monitoring funding opportunities could lead to potential collaborations with these sites in supporting their protection or in offsetting any harm by completing improvements elsewhere.

LFRMS strategic objective D

To apply knowledge on local flood risk to assist in improving Southwark's resilience to the impacts of climate change.

Outcome: No negative effect

There is not expected to be a negative effect from the delivery of LFRMS strategic objective D and its actions. Reasons for this are as follows:

- Reducing the carbon emissions released from flood management work will have a positive impact.
- Supporting biodiversity within flood management will encourage others to do the same.

3.4 Screening analysis consultation questions

3. Do you have any comments on the method for the assessment of the HRA sites against the Local Flood Risk Management Strategy strategic objectives?
4. Do you agree with the screening analysis for each of the objectives? If not, please give reasons as to why you would screen a certain objective differently.

4 Conclusions and next steps

4.1 Conclusions

The screening analysis identified four Natura 2000 sites that may be at risk from the implementation of the LFRMS and its associated Action Plan. The pressures and threats to the habitats and species present at these sites were reviewed and analysed to identify the effect which the LFRMS would pose. From this, it has been concluded that there will be no negative effects from the delivery of these strategic objectives and their underlying actions to the identified Natura 2000 sites.

The LFRMS strategic objectives aim to both directly and indirectly enhance and protect natural and water environments. Due to this, there are some opportunities where LFRMS actions could offer positive influences on the HRA sites. For example, by improving community awareness to encourage greater environmental stewardship and by showing leadership in utilising best practice to help improve the natural environment.

It has therefore been concluded that the HRA for the LFRMS does not require progression onto later tasks and does not require a full assessment.

4.2 Consultation of the HRA

The HRA Screening Report is required to undergo a statutory consultation with Natural England to review the scope of the HRA Screening Report and its analysis of the sites identified. This was subsequently followed by a public consultation where members of the public were given the opportunity to review the HRA Screening Report and the other documents being produced that make up the LFRMS. The public consultation was completed in Summer 2023. Feedback received from the stakeholders, statutory consultee and public were then collated and applied into final document versions to be published.

4.3 Final comments consultation questions

5. Do you have any comments on the conclusions that we have made in this HRA Screening Report of the Local Flood Risk Management Strategy?
6. Do you have any additional comments or suggestions for this HRA Screening Report?