

**LONDON BOROUGH OF EALING  
LOCAL FLOOD RISK  
MANAGEMENT STRATEGY  
HABITATS REGULATIONS  
ASSESSMENT SCREENING REPORT**

September 2016

EALING COUNCIL

<b>Table of Contents</b>			
<b>1. Executive Summary</b>	3	<b>3. Identification of Relevant Sites</b>	7
1.1. Habitats Regulations Assessments	3	3.1. Introduction to the Sites	7
1.2. HRA Relevant Sites	3	3.2. South West London Waterbodies	7
1.3. HRA Consultation Questions	3	3.3. Richmond Park	8
1.4. Screening Report Conclusions	4	3.4. Wimbledon Common	9
<b>2. Introduction</b>	4	<b>4. Screening Analysis of the Local Flood Risk Management Strategy</b>	9
2.1. Why produce a Habitats Regulations Assessment	4	4.1. What the Screening Analysis stage includes	9
2.2. Methodology	4	4.2. Screening Analysis	10
2.3. London Borough of Ealing's Local Flood Risk Management Strategy	5	<b>5. Conclusions and Next Steps</b>	11
2.4. Consultation Process	6	5.1. Conclusions	11
		5.2. Consultation of the HRA	11

<b>Title</b>	London Borough of Ealing Local Flood Risk Management Strategy: Habitats Regulations Assessment Screening Report
<b>Version</b>	1.3 – Final for adoption
<b>Owner</b>	Shahid Iqbal – Assistant Director Highways Service

<b>Revision History</b>	
Version 1.0 – First Draft	17th July 2014
Version 1.1 – Draft for Public Consultation	17th December 2014
Version 1.2 – Final for Adoption	4th November 2015
Version 1.3 – Final for Adoption	8th August 2016

<b>Project Team</b>	
Shahid Iqbal	Assistant Director Highways Service
Hayden Tuck	Estates and Development Manager
Jasdeep Bhachu	Structures, Flood and Water Management
Danielle Parfitt	Water and Flood Risk Management Consultant

**1. Executive Summary**

**1.1. Habitats Regulations Assessments**

The EU Habitats Directive was adopted in 1992 and together with the EU Birds Directive aims to protect habitats and species of European significance. The Habitats Directive was transposed into English law through the Conservation of Habitats and Species Regulations (2010). The network of sites which have been designated as rare, endangered or vulnerable are known as Natura 2000 sites and these include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar sites (wetlands of international importance). The Habitats Directive requires any plan or project which is likely to have a significant effect upon, but is not directly connected to or necessary to the management of, any Natura 2000 site to undergo a Habitats Regulations Assessment (HRA). The HRA will determine whether the plan or project is likely to have a significant impact upon such a site's conservation objectives.

A HRA is split into two main stages; the Screening stage and the Appropriate Assessment stage. This HRA accompanies the final draft of the London Borough of Ealing's Local Flood Risk Management Strategy ('the Strategy') at December 2014 and fulfils the requirement of the Screening Report to determine whether the adoption of the Strategy will have a significant effect on any Natura 2000 site. If the Screening Report concludes that there is likely to be an effect on such a site then an Appropriate Assessment Report will be produced to propose alternative options to reduce the effect as best as possible.

**1.2. HRA Relevant Sites**

So as to determine whether the Strategy is likely to have an impact upon Natura 2000 sites this Screening Report has identified any such sites which may be affected. There are no Natura 2000 sites within the borough, but as plans being prepared by the Council may influence sites in the neighbouring boroughs, sites were scoped into the study if they are either wholly or partly within 10km of the borough boundary. The following three sites were identified: South West Waterbodies (SPA and Ramsar site), Richmond Park (SAC) and Wimbledon Common (SAC). Although not within the scope of this HRA, it should be mentioned that within the borough there are a number of Sites of Special Scientific Interest (SSSIs) and conservation areas.

**1.3. HRA Consultation Questions**

This HRA is to be consulted on alongside the final draft of the Strategy by the two statutory agencies, the Environment Agency and Natural England, and the following questions have been included within this Screening Report to aid the collection of comments of our approach and conclusions.

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 the relevant information for these sites?
3. Do you agree that the coding criteria method is appropriate to assess the Local Flood Risk Management Strategy 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.
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?

This HRA Scoping Report has been consulted upon by the two statutory agencies (the Environment Agency and Natural England) alongside the public consultation of the Strategy which occurred in between February and April 2015.

1.4. Screening Report Conclusions

The analysis of the Strategy's objectives was performed using the coding method suggested in Natural England's draft guidance (*The Assessment of Regional Spatial Strategies and Sub Regional Strategies under the Provisions of the Habitats Regulations* by Tyldesley and Associates, 2006). This is a list of nine reasons as to why an objective can be screened in or out of further detailed assessment and for this HRA these reasons form the basis of the decision not to screen any of the Strategy objectives in. This conclusion was deduced because the objectives do not promote any work schemes to occur near any of the three Natura 2000 sites, and they are unlikely to have a detrimental effect on the existing pressures that the sites are under (recreational pressure at each site and poor air quality only at Wimbledon Common). In addition to this the Strategy is proposing objectives and associated actions to improve and protect the environment with management techniques which mimic natural drainage as much as possible so as to reduce the risk of flooding throughout the borough.

Further revisions of the Strategy and its objectives may require further detailed analysis of the effect it may have on Natura 2000 sites, dependent upon the scale of the revision and proposed schemes, but at this stage it is believed that an Appropriate Assessment is not necessary and this Screening Report fulfils the requirements of the Habitats Directive and Regulations.

2. Introduction

2.1. Why produce a Habitats Regulations Assessment

The EU Habitats Directive was adopted in 1992 and is also formally known as *92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora*. It aims to provide protection to habitats and species which have been designated as being of European significance and sits alongside the EU Birds Directive adopted in 2009. The sites where such habitats and species are legally protected due to their exceptional importance are known as **Natura 2000** sites and this network protects rare, endangered or vulnerable habitats and species. The Natura 2000 network includes Special Areas of Conservation (SACs, identified under the Habitats Directive), Special Protection Areas (SPAs, identified under the Birds Directive) and Ramsar sites (wetlands of international importance designated under the Ramsar Convention). All Natura 2000, or 'European', sites are also classified as Sites of Special Scientific Interest (SSSIs) but not all SSSIs are Natura 2000 sites.

The Habitat Directive requires any plan or project (including land use plans) which is likely to have a significant effect on, but is not directly connected to or necessary to the management of, a designated site to undergo a Habitats Regulations Assessment (HRA). The HRA aims to determine whether the plan or project will have an implication upon the site in terms of its conservation objectives.

2.2. Methodology

The Department of Communities and Local Government produced guidance on HRAs and stated that a HRA should be split into two main stages, a summary of these being in Table 2.1.

Table 2.1: Summary of the Stages and Tasks involved in a HRA

HRA Stages	HRA Tasks
Screening Stage	Task 1: Likely significant effects
Appropriate Assessment Stage	Task 2: Appropriate assessment and ascertaining the effect on site integrity
	Task 3: Mitigation and alternative solutions

This Screening Report includes the first stage of the HRA process and will assess whether the adoption of the London Borough of Ealing's Local Flood Risk Management Strategy will have a significant effect on any Natura 2000 sites through the implementation of its proposed objectives. If any objective is deemed likely to have a significant effect then an Appropriate Assessment Report will be produced. This would assess the proposals in further detail with the aim of suggesting alternatives to reduce the risk. However, if there are no viable alternatives then the plan can only be implemented if there are 'imperative reasons of overriding public interest'.

2.3. London Borough of Ealing's Local Flood Risk Management Strategy

2.3.1. Introduction to the Local Flood Risk Management Strategy

As the Lead Local Flood Authority (LLFA) for the area, the London Borough of Ealing ('the Council') has the responsibility to develop, maintain, apply and monitor a Local Flood Risk Management Strategy ('the Strategy'). This document assesses the risk of flooding in the borough and identifies the various risk management authorities in the area. It outlines the Council's flood risk management functions and the objectives for managing local flood risk, along with the actions proposed to achieve these objectives. It also explains how the Strategy contributes to the achievements of the wider environmental objectives. The strategy is to be reviewed on a six year basis or following significant amendments to related legislation.

2.3.2. Information about the London Borough of Ealing

The London Borough of Ealing is one of 33 boroughs in London and is located in the west of London. It borders the London Boroughs of Hillingdon, Harrow, Brent, Hammersmith and Fulham and Hounslow. The boroughs ‘main rivers’ (larger watercourses which are the responsibility of the Environment Agency) are the River Brent, Osterley Park Boundary Stream and the Yeading Brook. Smaller watercourses, categorised as ‘ordinary watercourses’ (managed by the Council) include the Costons Brook, Dormers Walls Stream and Northolt Brook. Additionally, the Grand Union Canal runs through the borough. Canals are manmade watercourses which are managed and maintained by the Canal and Rivers Trust.

2.3.3. Strategy Objectives

Partnership working is key to raising awareness and reducing the impacts of flood risk, and the Strategy reflects this through the five objectives:

1. Develop and improve the understanding of flood risk across the borough
2. Maintain and improve communication and cooperative working between strategic parties and flood risk management authorities
3. Prevent the increase of flood risk through inappropriate development
4. Develop community awareness of flood risk and ways of reducing the risk in the future
5. Identify and implement flood mitigation measures where funding can be secured

Each objective has a number of associated actions to help achieve it. There are 14 actions in total and an overview of each can be found in the Strategy’s Executive Summary document. For further information please see chapters 6 to 10 of the Strategy where each objective and action is described in greater detail.

2.4. Consultation Process

This HRA Scoping Report was reviewed by the two statutory HRA agencies (‘the consultation bodies’) in England; the Environment Agency and Natural England between February and April 2015. Questions that the Council requested the consultation bodies answered are listed in Section 1.3 of this document.

3. Identification of Relevant Sites

3.1. Introduction to the Sites

For a plan or policy to have the potential to cause a significant effect on a Natura 2000 site it is worth noting that the objectives do not have to be proposed to be occurring in such a site as the effects might be felt from outside of a Natura 2000 site. For this Screening Report the focus was just on such sites which lie fully or partially within a 10km radius of the administrative boundary of the borough.

Local Natura 2000 sites were identified using the information and mapping facilities available on the Joint Nature Conservation Committee’s website ([www.jncc.org.uk](http://www.jncc.org.uk)) and the government’s MAGIC website ([www.magic.gov.uk](http://www.magic.gov.uk)). The MAGIC website provides authoritative geographic information about the natural environment from across government. The information covers rural, There are no such Natura 2000 sites within the borough, although three sites fall either fully or partially within a 10km radius of the borough boundary (see Figure 3.1). Additional areas nearby that should be noted in this Screening Report are introduced in Section 3.5.

3.2. South West London Waterbodies

The South West London Waterbodies site is designated as both a Ramsar site and as a SPA. It is located outside and to the south west of Ealing Council’s administrative boundary. It lies within the London Borough of Hounslow, the Royal Borough of Windsor and Maidenhead and the county of Surrey. The site boundary is coincident with Kempton Park Reservoirs SSSI, Knight and Bassborough Reservoirs SSSI, Thorpe Park No. 1 Gravel Pit SSSI, Wraysbury No. 1 Gravel Pit SSSI and Wraysbury Reservoir SSSI and includes parts of Staines Moor SSSI and Wraysbury and Hythe End Gravel Pits SSSI. Table 3.1 summarises the key information relating to the South West London Waterbodies SPA.

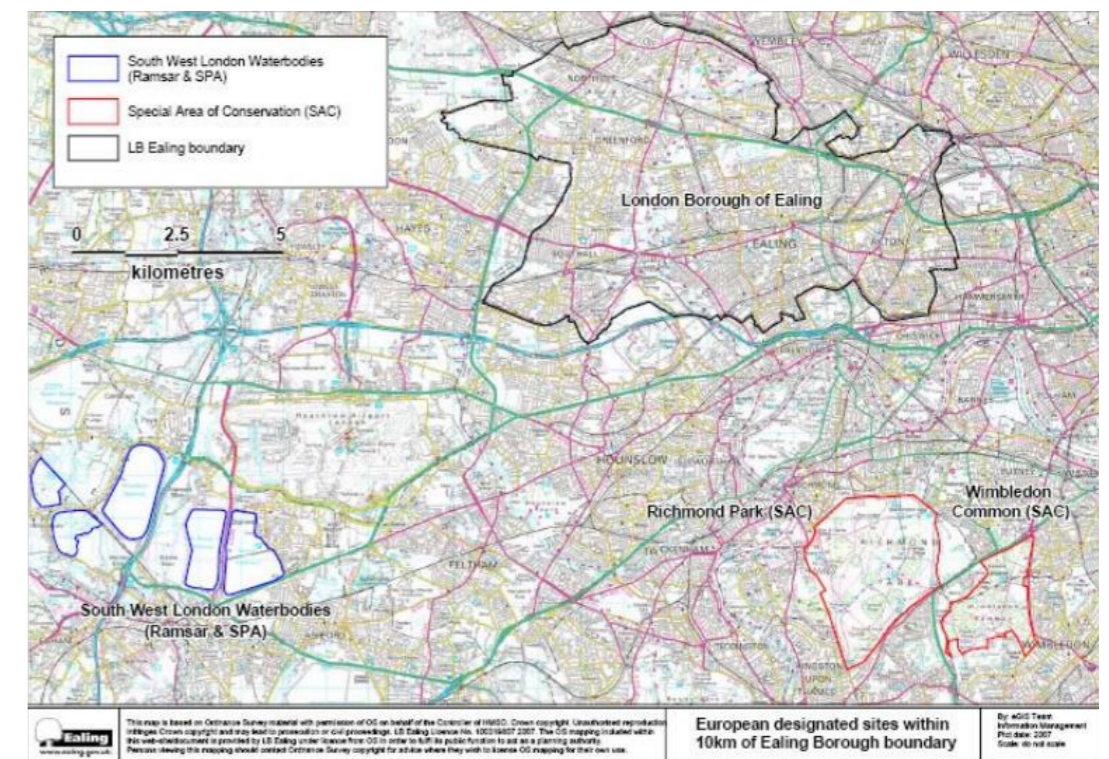


Figure 3.1: A map showing the Natura 2000 Sites within 10km of Ealing Council’s administrative boundary

**Table 3.1:** Site information for the South West London Waterbodies SPA

<b>Site Classification and Code</b>	SPA UK9012171 Ramsar No. 1038
<b>Area (ha)</b>	828.14ha
<b>Habitat and Species SPA Qualifying Features</b>	Over winter, the area regularly supports: Shoveler, <i>Anas clypeata</i> (north-western/central Europe). This SPA site contains 853 individuals, representing an average of 2.1% of the population (5 year peak mean for 1993/94 to 1997/98). Gadwall, <i>Anas strepera</i> (north-western Europe). This SPA site contains 710 individuals, representing an average of 2.4% of the population (5 year peak mean for 1993/94 to 1997/98).
<b>Habitat Class Description and Cover</b>	- Inland water bodies (standing water, running water): 70.0% - Humid grassland. Mesophile grassland: 5.0% - Improved grassland: 20.0% - Broad-leaved deciduous woodland: 5.0%
<b>Current Condition and Threats</b>	- There is an issue surrounding the potential future decommissioning of reservoirs once they are no longer required for the purpose of water supply; as well as the potential impacts of maintenance works. Additionally, water level and water quality must be maintained. - Wraysbury gravel pits suffer from high levels of disturbance from recreational activities. There is potential for other parts of the site to be adversely affected by the increased recreational pressure. - The threat from potential development pressures in this urbanised, urban-fringe area is largely covered by the relevant provisions of the Conservation Regulations (1994).
<b>Key Ecosystem Factors</b>	- Extend and distribution of habitat - Water depth - Food availability

**3.3. Richmond Park**

Richmond Park is a SAC site, located to the south of Ealing Council's administrative boundary within the London Borough of Richmond upon Thames, the London Borough of Wandsworth and the Royal Borough of Kingston upon Thames. Table 3.2 summarises the key information relating to Richmond Park SAC.

**Table 3.2:** Site information for Richmond Park SAC

<b>Site Classification and Code</b>	SAC UK0030246
<b>Area (ha)</b>	846.68ha
<b>Habitat and Species SAC Qualifying Features</b>	Stag beetle, <i>Lucanus cervus</i> . This is one of only four known outstanding localities in the United Kingdom.
<b>Habitat Class Description and Cover</b>	- 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: 18.0% - Humid grassland. Mesophile grassland: 5.0% - Improved grassland: 20.0% - Broad-leaved deciduous woodland: 25.0% - Mixed woodland: 5.0%
<b>Current Condition and Threats</b>	- The site is surrounded by urban area and therefore experiences high levels of recreational pressure. The whole site has been declared a National Nature Reserve. - Decaying timber habitat currently maintained by management techniques.
<b>Key Ecosystem Factors</b>	- Population size of species - Number of old broadleaved trees - Population structure of broadleaved trees - State of decay - Quantity and size of fallen broadleaved dead wood - Position and degree of exposure of old broadleaved trees and stumps - Condition and position of available dead timer

**3.4. Wimbledon Common**

Wimbledon Common is a SAC site, located to the south of Ealing Council's administrative boundary within the London Borough of Wandsworth and the London Borough of Merton. Table 3.3 summarises the key information relating to Wimbledon Common SAC.

**Table 3.3:** Site information for Wimbledon Common SAC

<b>Site Classification and Code</b>	SAC UK0030301
<b>Area (ha)</b>	348.31ha
<b>Habitat and Species SAC Qualifying Features</b>	Northern Atlantic wet heaths with <i>Erica tetralix</i> . For which the area is considered to support a significant presence. European dry heaths. For which the area is considered to support a significant presence. <i>Lucanus cervus</i> . For which this is one of only four known outstanding locations in the United Kingdom.
<b>Habitat Class Description and Cover</b>	- Inland water bodies (standing water, running water): 1.0% - Bogs. Marshes. Water fringed vegetation. Fens: 0.5% - Heath. Scrub. Maquis and garrigue. Phygrana: 5.0% - Dry grassland. Steppes: 45.0% - Improved grassland: 3.5% - Broad-leaved deciduous woodland: 45.0%
<b>Current Condition and Threats</b>	- The site is located in an urban area and therefore experiences heavy recreational pressure. - Decaying timber habitat currently maintained by management techniques. - Air pollution is thought to be having an impact on the quality of the heathland habitat. - Air quality
<b>Key Ecosystem Factors</b>	- Population size of species - Number of old broadleaved trees - Population structure of broadleaved trees - Condition of old broadleaved trees - State of decay - Quality and size of fallen broadleaved dead wood. - Position and degree of exposure of old broadleaved trees and stumps - Condition and position of available dead timer

**4. Screening Analysis of the Local Flood Risk Management Strategy**

**4.1. What the Screening Analysis stage includes**

The screening analysis stage is the assessment of the Strategy's proposed objectives to determine whether any are likely to cause significant effects to Natura 2000 sites. For this analysis we propose to use the coding method suggested in the Natural England's draft guidance (*The Assessment of Regional Spatial Strategies and Sub Regional Strategies under the Provisions of the Habitats Regulations* by Tydesley and Associates, 2006) to determine whether the objectives are screened in or out at this stage. This method uses nine criteria as the basis of the decision of the screening analysis and these are listed in Table 4.1.

**Table 4.1:** Coding criteria used in the screening analysis of the Local Flood Risk Management Strategy's objectives against Natura 2000 sites (amended from Tydesley and Associates, 2006)

<b>Reasons why objective will have no effect on a Natura 2000 site</b>	1. The objective will not itself lead to development (e.g. it relates to design or other qualitative criteria for development, or it is not a land use planning policy).	
	2. The objective makes provision for a quantum / type of development (and may or may not indicate one or more broad locations e.g. a county, or district, or sub-region) but the location of the development is to be selected following the consideration of options in lower tier plans or planning permission applications.	
	3. No development could occur through this objective alone, because it is implemented through sub-ordinate policies that are more detailed and therefore more appropriate to assess for their effects on a Natura 2000 site and associated sensitive areas.	
	4. Concentration of development in urban areas will not affect a Natura 2000 site and will help to steer development and land use change away from a Natura 2000 site and associated sensitive areas.	
	5. The objective will help to steer development away from a Natura 2000 site and associated sensitive areas, e.g. not developing in areas of flood risk or areas otherwise likely to be affected by climate change.	
	6. The objective is intended to protect the natural environment, including biodiversity.	
	7. The objective is intended to conserve or enhance the natural, built or historic environment, and enhancement measures will not be likely to have any effect on a Natura 2000 site.	
	<b>Reason why objective could have a potential effect</b>	8. The objective steers a quantum or type of development towards, or encourages development in, an area that includes a Natura 2000 site or an area where development may indirectly affect a Natura 2000 site.
	<b>Reason why objective would be likely to have a significant effect</b>	9. The objective makes provision for a quantum, or kind of development that in the location(s) proposed would be likely to have a significant effect on a Natura 2000 site. The proposal must be subject to appropriate assessment to establish, in light of the site's conservation objectives, whether it can be ascertained that the proposal would not adversely affect the integrity of the site.

### 4.2. Screening Analysis

The following subsections summarise the five proposed Strategy objectives, assess whether they are likely to have an effect on a Natura 2000 site (using the nine criteria from Table 4.1) and include an individual conclusion for each objective as to whether it should be screened in (and analysed further in a HRA Appropriate Assessment) or screened out.

#### 4.2.1. Strategy objective 1 – Develop and improve the understanding of flood risk across the borough.

This objective aims to collect further evidence of flood events, to help improve our knowledge of where flooding commonly occurs and what depths and durations have previously occurred. This information will be obtained from meeting of the Risk Management Authorities, investigation of severe flood incidents under Section 19 of the Flood and Water Management Act 2010 and by continuing with existing detailed modelling exercises (funding and resource dependent). The collected information will help to validate models and support bids for funding, lending confidence to the outputs. Although the detailed modelling may lead to flood risk mitigation schemes being implemented in the long term, in the near future the modelling and sharing of findings with associated risk management authorities will not have any effect upon any of the three Natura 2000 sites. If work schemes were suggested to take place near the Natura 2000 sites further assessment may be required but the nature of the work should only affect the environment positively. Therefore using criteria reasons 3, 6 and 7 we propose to **screen out** this objective.

#### 4.2.2. Strategy objective 2 – Maintain and improve communication and cooperative working between strategic parties and flood risk management authorities.

The actions to deliver objective 2 look to continue the good work which has been completed to date. In many areas authorities are talking to each other more often and cooperating to jointly reduce flooding. The joint working should include working together to ensure that up to date contingency plans are in place in Critical Drainage Areas and identifying opportunities for joint working schemes to reduce flood risk. The objectives also highlight that the Council should continue to work in partnership with external bodies to manage flood risk. As above, if work schemes were suggested to take place near the Natura 2000 sites further assessment may be required but the nature of the work should only affect the environment positively. For this reason, and building upon criteria reasons 3, 6 and 7, we propose for this objective to be **screened out**.

#### 4.2.3. Strategy objective 3 – Prevent the increase of flood risk through inappropriate development.

Preventing flooding through effective planning controls has a large potential to help ensure that new houses are not at risk of flooding. Along with the Council's Strategic Flood Risk Assessment document and the National Planning Policy Framework, objective 3 of the Strategy outlines the need to ensure that all developments in flood risk areas are appropriate. For the built environment that is already at risk of flooding, sustainable drainage retrofitting can be a solution, therefore a target to establish areas where retrofitting could be carried out has been decided upon. To ensure that developers have a clear idea of what Ealing Council will be looking to achieve with SuDS, an action states that guidance will be created. Finally, in order to allow space for water and prevent increased flood risk due to poorly sighted developments, the Council will look at the potential of creating other parks, or areas of restricted development. The action to restrict development in such areas aligns with one of the sub-themes in the Council's Corporate Plan to improve environment services. The fact that this objective looks to prevent developments in areas which may cause an increase in flood risk and introduce retrofitted SuDS, there is expected to be a decrease in flood risk which, therefore, would have a positive effect of the environment and therefore will have a positive effect on the Natura 2000 sites. Due to this, we propose to **screen out** this objective with critical reasons 1, 3, 5, 6 and 7.

#### 4.2.4. Strategy objective 4 – Develop community awareness of flood risk and ways of reducing the risk in the future.

The majority of flooding that occurs on a regular basis is small and does not damage properties. We are fortunate in that extreme events do not happen often, which often results in difficulties in keeping in mind the potential risks of extreme rainfall. Due to climate change there is a chance that the country may receive more intense rain as experienced in winter 2013/2014. Because of this, one of the goals of creating the Strategy is to make stakeholders more aware of the more extreme risks in the borough. This is to be actioned by developing exercises to engage with at risk communities in Critical Drainage Areas and by identifying opportunities for property level protection and implement where possible. Reducing the risk of flooding will have a positive effect on the environment, therefore we propose to **screen out** this objective with critical reasons 6 and 7.

#### 4.2.5. Strategy objective 5 – Identify and implement flood mitigation measures where funding can be secured.

As and when funding permits, identifying the potential for, and developing where appropriate, flood mitigations schemes, we have a likely potential to protect and enhance the natural environment. Therefore we propose to **screen out** objective 5 using criteria reasons 6 and 7.

## 5. Conclusions and Next Steps

### 5.1. Conclusions

The screening analysis stage has identified that none of the five Strategy objectives are likely to have a significant effect on any of the Natura 2000 sites found within a 10km boundary of the London Borough of Ealing. Similarly, the objectives are not expected to further increase the recreational pressures on the Natura Sites and air pollution is unlikely to be affected by the implementation of the Strategy. With future revisions of the Strategy and its objectives and associated actions likely to propose site specific flood risk schemes a further detailed HRA Appropriate Assessment may be required when this is the case, dependent upon the scale of the revisions and proposed schemes. However, at this stage it is believed that it is not considered necessary and the requirements of the Directive and Regulations have been met with this HRA Screening Report.

### 5.2. Consultation of the HRA

The final task of this HRA is the consultation of this Screening Report by the two consultation bodies, the Environment Agency and Natural England and further information about the process can be found in Section 2.4. The consultation occurred between February and April 2015. Minor amendments made are incorporated in this final version of the Strategy's HRA but in summary both of the consultation bodies agreed with the content of the consulted HRA.

**Lead Local Flood Authority  
Highways Service**

Ealing Council  
Perceval House  
14/16 Uxbridge Road  
Ealing W5 2HL

floodrisk@ealing.gov.uk

[www.ealing.gov.uk](http://www.ealing.gov.uk)