

City of London Corporation

Local Flood Risk Management
Strategy – Habitats Regulations
Assessment Screening Report

[Draft]

Date



Executive Summary

The City of London Corporation as the Lead Local Flood Authority, must develop, maintain, apply and monitor a Local Flood Risk Management Strategy in its area. A Habitats Regulations Assessment is required for any strategy 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. Natura 2000 sites include existing or proposed Special Areas of Conservation, Special Protection Areas, and Ramsar designated sites. This document represents the Screening Report, which is the first stage of a Habitats Regulations Assessment.

There are no Natura 2000 sites within the City of London. A distance of 15km from the City of London boundary was used to identify any Natura 2000 sites that may have an ecological or hydrological link to the City of London. The following sites were identified:

- Lee Valley (Special Protection Area and Ramsar Site)
- Epping Forest (Special Area of Conservation)
- Wimbledon Common (Special Area of Conservation)
- Richmond Park (Special Area of Conservation)

Information was gathered on each of the sites' habitats, species and threats to inform a screening exercise whereby each of the Local Flood Risk Management Strategy's strategic outcomes was individually assessed against each of the sites. The purpose of this exercise was to identify any potential harmful effects on the identified designated sites as a result of the Local Flood Risk Management Strategy.

The screening assessment concluded that the implementation of the Local Flood Risk Management Strategy will not likely cause any negative effect on any of the identified Natura 2000 sites. Therefore, the Local Flood Risk Management Strategy does not need to progress into any further HRA stages and a full HRA is not required.

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1. Introduction

Purpose of screening

[The Conservation of Habitats and Species \(Amendment\) \(EU Exit\) Regulations \(2019\)](#) requires any plan, programme, or strategy 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 (European site) to undergo a Habitats Regulations Assessment (HRA).

This document will focus on the Screening Assessment stage in relation to the Local Flood Risk Management Strategy (LFRMS) of the City of London, determining whether the adoption of the LFRMS will have a significant effect on any European sites which are a network of locations which have been designated as rare, endangered or vulnerable, and include:

- **Special Areas of Conservation (SACs):** Areas designated under the [European Union's Habitats Directive \(1992\)](#) as providing increased protection to multiple species of animals and plants in addition to habitats as part of global efforts to conserve the world's biodiversity.
- **Special Protection Areas (SPAs):** Areas designated under the [European Wild Birds Directive \(2009\)](#) as having international importance for the conservation of rare and vulnerable bird species found within the European Union.
- **Ramsar Sites:** Wetlands of international importance designated under the [UK Ramsar Convention \(1976\)](#). Ramsar sites may also include riparian zones, such as the banks of a watercourse.

Methodology

The Department for Environment, Food and Rural Affairs (DEFRA) have produced [guidance](#) which defines the HRA process:

Stage 1 (Screening Assessment): To check if the plan, programme, or strategy is likely to have a significant effect on the site's conservation objectives.

Stage 2 (Appropriate Assessment): To assess the likely significant effects of the proposal in more details and identify ways to avoid or minimise any effects.

Stage 3 (Derogation Assessment): To consider if proposals would have an adverse effect on a European site quality for exemption.

Summary of Local Flood Risk Management Strategy

The City Corporation's LFRMS identifies the approach that the City Corporation is taking over the next six years to manage the flood risks that impact the Square Mile and the processes by which progress will be monitored.

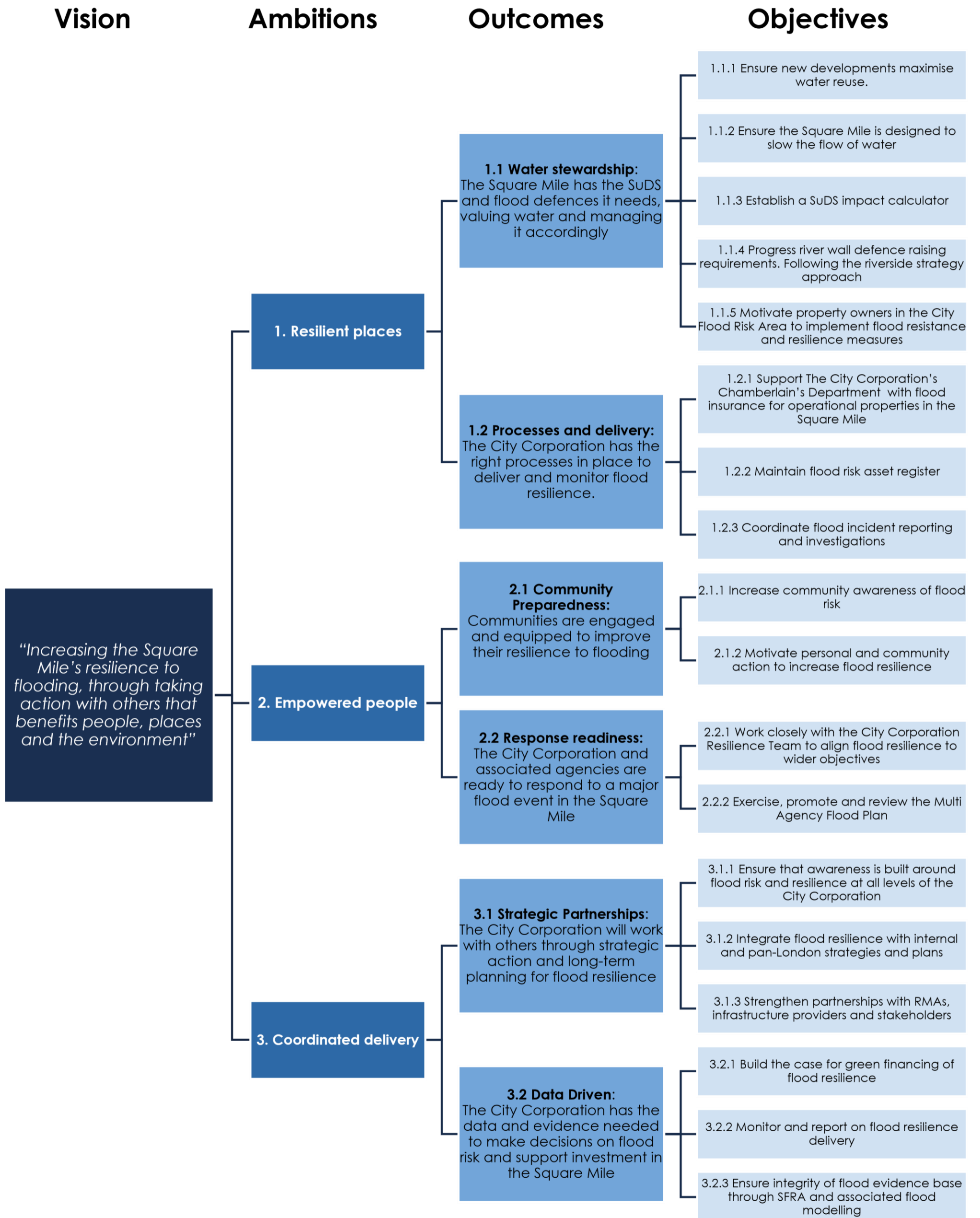
The strategic framework of the LFRMS aligns with the ambitions of the 2025 London Surface Water Strategy but has a tailored vision, outcomes and objectives to suit the unique context of managing flood risk within the Square Mile.

The outcomes of the LFRMS set out the results that will be brought about through its delivery to benefit the people, places and environments in the Square Mile. The proceeding figure (Figure 1) depicts the delivery framework of the LFRMS, which comprises a vision, ambitions, outcomes and objectives.

Consultation process

This HRA screening is required to be reviewed by the statutory consultee, Natural England. A public consultation period for the draft LFRMS is planned to be conducted across July and August 2026, subject to committee approval. During this period, the draft LFRMS and this HRA screening will be shared directly with the statutory consultees and be available for members of the public and other stakeholders to provide comments. Suggested amendments will then be reviewed and incorporated as part of the process for preparing the final version of the LFRMS.

Figure 1: LFRMS vision, ambitions, outcomes and objectives framework



2. Identification of relevant European sites

European sites within the City of London

There are no European sites within the City of London.

European sites in proximity to City of London

As illustrated in Figure 2, four European sites lie wholly or partially within a 15 km buffer zone from the City of London boundary:

- Lee Valley SPA and Ramsar Site (~6.0km from the City of London)
- Epping Forest SAC (~8.7km from the City of London)
- Wimbledon Common SAC (~10.4km from the City of London)
- Richmond Park SAC (~11.9km from the City of London)

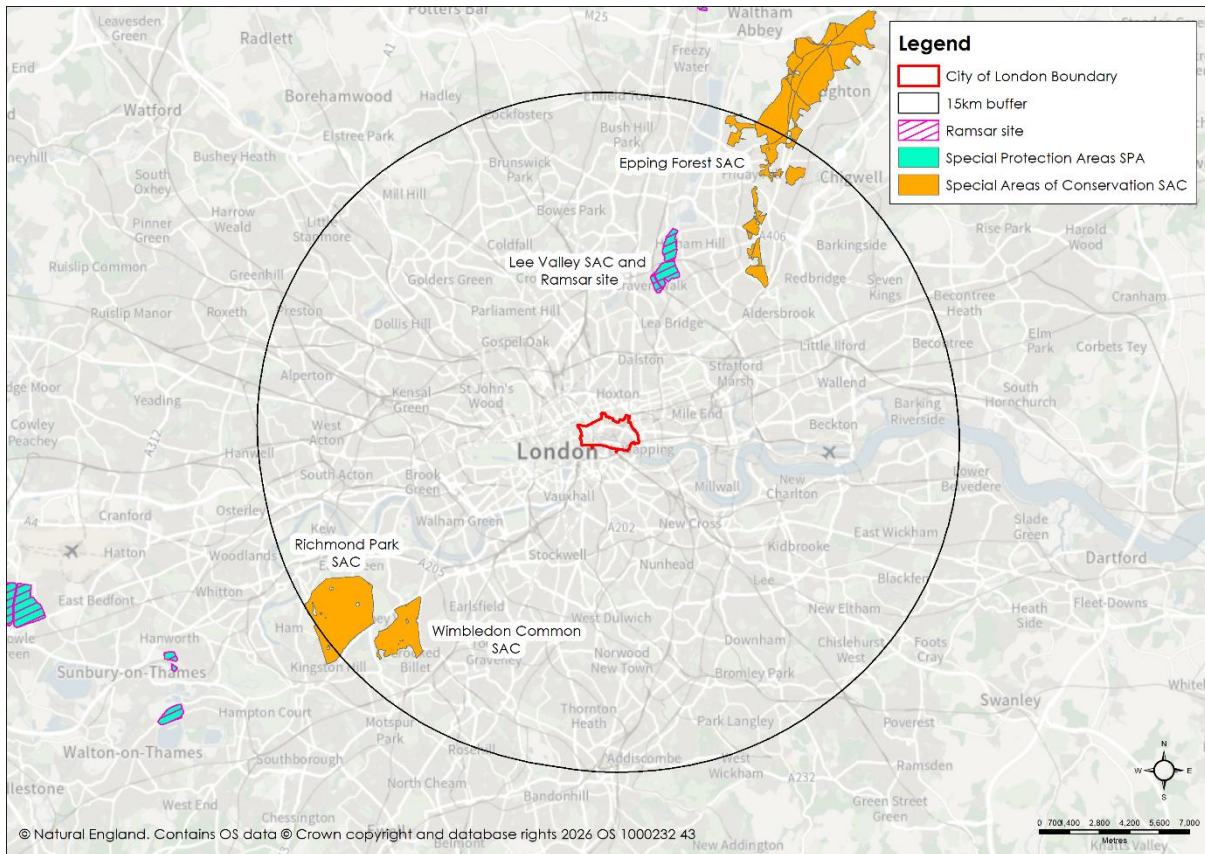


Figure 2 – European sites located within a 15 km buffer of the City of London

Detailed information about each of the European sites is provided in Annex A.

3. Screening analysis

Screening analysis

The screening assessment assesses each of the proposed LFRMS outcomes and objectives against each of the identified designated sites. The purpose of this is to ascertain whether there will be any harmful effects on the designated sites by implementing the LFRMS. Should any harmful effects be identified, this HRA screening report will progress to the second HRA stage.

The outcomes of the LFRMS have been assessed against the HRA sites. The scoring criteria for the assessment is shown in Table 1 and a summary of the screening analysis findings is shown in Table 2.

Table 1: Scoring criteria

++	The strategic outcome could have a potential significant positive effect on a European site.
+	The strategic outcome could have a potential positive effect on a European site.
0	The strategic outcome will have no effect on a European site.
-	The strategic outcome could have a potential harmful effect on a European site.
--	The strategic outcome could have a potential significant harmful effect on European site.
?	Uncertain.

Table 2: Screening analysis findings summary

		European sites			
		Lee Valley	Epping Forest	Wimbledon Common	Richmond Park
LFRMS outcomes	1.1	0	0	0	0
	1.2	0	0	0	0
	2.1	0	0	0	0
	2.2	0	0	0	0
	3.1	0	0	0	0
	3.2	0	0	0	0

Screening analysis outcomes

LFRMS Outcome 1.1 – Water Stewardship

This outcome will be realised through physical changes to the environment within the City of London including the installation of Sustainable Drainage Systems in buildings and the public realm, river wall raising along the River Thames and property level flood resilience measure in the City Flood Area. The City of London is not hydrologically connected to any of the identified

European sites, therefore there are no impact pathways for direct pollution associated with the construction or operation of the aforementioned physical measures to affect any of the European sites. Outcome 1.1 can therefore be screened out at this stage.

Notably, the River Thames runs along the City of London's southern boundary and receives overflows from the City's combined sewer network during periods of heavy rainfall. This hydraulic link means that pollutants from the sewer system could potentially be carried to downstream European Sites such as the Thames Estuary and Marshes SPA and Ramsar site and the Outer Thames Estuary SPA. These two sites are located approximately 35km and 55km from the City of London and were therefore not captured in the precautionary 15km buffer utilised for this HRA. However, the measures that will be delivered as part of the Water Stewardship outcome will improve sewer capacity, water quality and enhance biodiversity, which will have a positive effect on the River Thames and downstream European sites.

LFRMS Outcome 1.2 – Processes and Delivery

This outcome is primarily operational and governance-focused and will be mostly desk-based. Outcome 1.2 will not lead to physical changes that could harm any of the identified European sites. Therefore, Outcome 1.2 can be screened out at this stage.

LFRMS Outcome 2.1 – Community Preparedness

This outcome is engagement and behaviour-change focused. It is unlikely to have any negative impacts on the identified European sites as it does not involve the physical implementation of anything that would harm the sites. Therefore, Outcome 2.1 can be screened out at this stage.

LFRMS Outcome 2.2 – Response Readiness

This outcome is focused on emergency preparedness and inter-agency coordination. It is unlikely to have any negative impacts on the identified European sites as it does not involve the physical implementation of anything that would harm the sites. Therefore, Outcome 2.2 can be screened out at this stage.

LFRMS Outcome 3.1 – Strategic Partnerships

This outcome is strategic and partnership working focused. It is unlikely to have any negative impact on any of the identified European sites as it does not involve the physical implementation of anything that would harm the sites. Therefore, Outcome 3.1 can be screened out at this stage.

LFRMS Outcome 3.2 – Data Driven

This outcome underpins the evidence, monitoring and investment basis for all other LFRMS outcomes, it will be mostly desk-based and will not lead to

physical changes that could harm any of the identified European sites. Therefore, Outcome 3.2 can be screened out at this stage.

4. Conclusions

This HRA screening report indicates that the proposed LFRMS outcomes are not likely to cause any harmful effect on the identified European sites. It can therefore be concluded that the LFRMS does not need to progress into any further HRA stages and a full HRA is not required.

5. Next Steps

This report will be published alongside the public consultation version of the LFRMS. Received comments will be considered and relevant changes will be incorporated into the final LFRMS. Further HRA screening will be carried out on any changes that emerge from further evidence or consultation comments.

Annex A –European sites information

Lee Valley Summary

Lee Valley is a park of approximately 450 ha located in the north-east of London, approximately 6km northeast of the City of London. The park is comprised of water supply reservoirs, sewage treatment lagoons, gravel pits and wetlands. It is designated as a SPA according to the Birds Directive for internationally important numbers of breeding and wintering wildfowl, and it is a Ramsar site for its wetlands. Table A-1 presents the key information about Lee Valley, including the qualifying species and habitats as well as the current threats and pressures facing them.

Table A-1: Lee Valley site summary

Site designation	Ramsar and SPA
EU code	UK9012111
Area (ha)	451.29
Qualifying species and/or habitat features	<ul style="list-style-type: none"> • A056 Northern Shoveler (<i>Anas clypeata</i>) • A051 Gadwell (<i>Anas strepera</i>) • A021 Great Bittern (<i>Botaurus stellaris</i>)
General site character (% area)	<ul style="list-style-type: none"> • Bogs, Marshes, Water fringed vegetation, Fens (4%) • Other land including Towns, Villages, Roads, Waste places, Mines, Industrial sites (1%) • Inland water bodies (67%) • Humid grassland, Mesophile grassland (8%) • Improved grassland (10%) • Broad-leaved deciduous woodland (10%)
Conservation objectives	<p>Ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</p> <ul style="list-style-type: none"> • the extent and distribution of the habitats of the qualifying features • the structure and function of the habitats of the qualifying features • the supporting processes on which the habitats of the qualifying features rely • the populations of each of the qualifying features • the distribution of qualifying features within the site
Current threats and pressures	<ol style="list-style-type: none"> 1. Water pollution 2. Hydrological changes 3. Public access / disturbance 4. Inappropriate scrub control 5. Fisheries: fish stocking 6. Invasive species

	7. Inappropriate mowing / cutting 8. Air pollution: risk of atmospheric nitrogen deposition
Supplementary evidence	Lee Valley Standard Data Form Lee Valley Information Sheet on Ramsar Wetlands Lee Valley Site Improvement Plan

Epping Forest Summary

Epping Forest is an ancient forest which is designated as a SAC, as well as a Site of Special Scientific Interest (SSSI) under the [Wildlife and Countryside Act \(1981\)](#). It covers an area of approximately 1,630 ha and it extends for 19 km north to south and 4 km east to west between Greater London and Essex. Epping Forest is located approximately 8.7km northeast of the City of London.

Table A-2: Epping Forest site summary

Site designation	SAC and SSSI
EU code	UK0012720
Area (ha)	1,630.74
Qualifying species and/or habitat features	<ul style="list-style-type: none"> • 1083 Stag Beetle (<i>Lucanus cervus</i>) • 1166 Great Crested Newt (<i>Triturus cristatus</i>) • H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> • H4030 European dry heaths • H9120 Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrub layer
General site character (% area)	<ul style="list-style-type: none"> • Inland water bodies (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%)
Conservation objectives	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species

	<ul style="list-style-type: none"> • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.
Current threats and pressures	<ol style="list-style-type: none"> 1. Air pollution: impact of atmospheric nitrogen deposition 2. Undergrazing 3. Public access / disturbance 4. Changes in species distributions 5. Inappropriate water levels 6. Water pollution 7. Invasive species 8. Disease
Supplementary evidence	Epping Forest Standard Data Form Epping Forest Site Improvement Plan

Wimbledon Common Summary

Wimbledon Common is one of the largest areas of uncultivated land in the conurbation of London, supporting a mosaic of habitats including broadleaved woodland, acid grassland, dry and wet heath, scrub and mire. The site is designated as a SAC and a SSSI and covers an area of approximately 348 ha. Wimbledon Common is located approximately 10.4km southwest of the City of London.

Table A-3: Wimbledon Common site summary

Site designation	SAC and SSSI
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 (% area)	<ul style="list-style-type: none"> • Bogs, Marshes, Water fringed vegetation, Fens (0.5%) • Heath, Scrub, Maquis and Garrigue, Phygrana (5%) • Dry grassland, Steppes (45%) • Inland water bodies (1%) • Broad-leaved deciduous woodland (45%) • Improved grassland (3.5%)
Conservation objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable

	<p>Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.
Current threats and pressures	<ol style="list-style-type: none"> 1. Public access / disturbance 2. Habitat fragmentation 3. Invasive species 4. Air pollution: impact of atmospheric nitrogen deposition
Supplementary evidence	Wimbledon Common Standard Data Form Wimbledon Common Site Improvement Plan

Richmond Park Summary

Richmond Park is situated in southwest London. It is one of the largest open spaces in Greater London with an area of approximately 846 ha. The parkland supports many ancient and veteran trees and the SAC is one of four primary sites in England for the stag beetle *Lucanus cervus*, a globally threatened species. The site is located approximately 11.9km south-west of the City of London.

Table A-4: Richmond Park site summary

Site designation	SAC, SSSI, National Nature Reserve (NNR)
EU code	UK0030246
Area (ha)	846.43
Qualifying species and/or habitat features	<ul style="list-style-type: none"> • S1083 Stag beetle, <i>Lucanus cervus</i>
General site character (% area)	<ul style="list-style-type: none"> • Inland water bodies (1.5%) • Bogs, Marshes, Water fringed vegetation, Fens (0.5%) • Heath, Scrub, Maquis and Garrigue, Phygrana (25%) • Mixed woodland (5%) • Improved grassland (20%) • Humid grassland, Mesophile grassland (5%) • Broad-leaved deciduous woodland (25%)

	<ul style="list-style-type: none"> • Dry grassland, Steppes (18%)
Conservation objectives	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, <p>The distribution of qualifying species within the site.</p>
Current threats and pressures	No current issues have been identified on this site.
Supplementary evidence	Richmond Park Standard Data Sheet Richmond Park Site Improvement Plan