City of London Corporation

# Local Flood Risk Management Strategy – Strategic Environmental Assessment Screening Report

[Draft]

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CITY OF LONDON

# 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 Strategic Environmental Assessment is required to be undertaken whenever a new strategy is being implemented to ensure that it poses no negative effects on the environment. This document represents the first stage of a Strategic Environmental Assessment – a screening report.

The screening assessment was carried out by analysing the level of effect each of the Local Flood Risk Management Strategy outcomes and their associated objectives would have on the following Strategic Environmental Assessment objectives:

**SEA1:** Protect, maintain and enhance green spaces to improve biodiversity and to help mitigate the effects of climate change.

**SEA2:** Protect the health, wellbeing and safety of residents, workers and visitors

**SEA3:** Protect the water quality of the River Thames and water resources of the Square Mile.

**SEA4:** Promote sustainable development to improve resilience to the impacts of climate change.

**SEA5:** Protect existing property and infrastructure, including cultural and historic assets by ensuring they are made resilient to flooding and the impacts of climate change.

These objectives were formed by considering all the current environmental issues within the City of London. It analysed information covering the following factors:

- Biodiversity, flora and fauna
- Population and human health
- Soil and geology
- Water
- Air
- Climatic factors
- Cultural heritage and landscape

The analysis concluded that the implementation of the Local Flood Risk Management Strategy will not likely cause any negative effects and will in fact enable positive effects on the Strategic Environmental Assessment objectives in addition to some neutral effects. This screening report demonstrates that no further progression is required through the Strategic Environmental Assessment process.

# Contents

# 1. Introduction

## Purpose of screening

A Strategic Environmental Assessment (SEA) reviews plans, programmes and strategies which are likely to cause significant environmental effects to a specified area. The Environmental Assessment of Plans and Programmes Regulations (2004), which implements the European SEA Directive (2001), requires the preparation of a publicly available SEA report prior to the enactment of such plans, programmes, and strategies. This report should assess any environmental, social, and economic impacts that the enactment of the proposes policies could cause. If the effects are regarded as too impactful, alternatives should be considered.

The purpose of this SEA Screening Report is to assess the potential environmental impact of the proposed delivery framework of the City of London Corporation's Local Flood Risk Management Strategy (LFRMS) 2027 – 2033. The results of this Screening Report will determine whether the LFRMS requires a full SEA assessment.

The City Corporation is updating its LFRMS to fulfil its requirements as a Lead Local Flood Authority (LLFA) under the Flood and Water Management Act 2010 (FWMA). The LFRMS will identify the areas of the Square Mile that are at risk of flooding and set out what the City Corporation intends to do to mitigate flood risk from all sources.

## Methodology

The SEA process has five stages, which are outlined in Table 1 below. This Screening Report is the outcome of the first stage (A). Progression beyond Stage A is only necessary if potential significant environmental impacts are identified during Stage A.

Table 1: Summary of the stages and tasks involved in a SEA

| SEA Stages | SEA task |
|---|---|
| **Stage A:** Setting the context and objectives, establishing the baseline and deciding on the scope. | A1: Identifying other relevant policies, plans and programmes, and environmental protection objectives |
| | A2: Collecting baseline information |
| | A3: Identifying environmental issues and problems |
| | A4: Developing the SEA objectives and framework |
| | A5: Consulting on the scope of the SEA |
| **Stage B:** Developing and refining options and assessing affects | B1: Testing the plan objectives against the SEA objectives |

| | |
|---|---|
| | B2: Developing strategic alternatives |
| | B3: Predicting the effects of the plan, including alternatives |
| | B4: Evaluating the effects of the plan, including alternatives |
| | B5: Mitigating adverse effects |
| | B6: Proposing measures to monitor the environmental effects of implementing the plan |
| **Stage C:** Preparing the environmental report | C1: Preparing the Environmental Report |
| **Stage D:** Consulting on the draft strategy and the SEA Report | D1: Consulting on the draft Strategy and Environmental Report with the public and consultation bodies |
| | D2: Assessing significant changes |
| | D3: Making decisions and providing information |
| **Stage E:** Monitoring the significant effects of implementing the strategy. | E1: Developing aims and methods for monitoring |
| | E2: Responding to adverse effects |

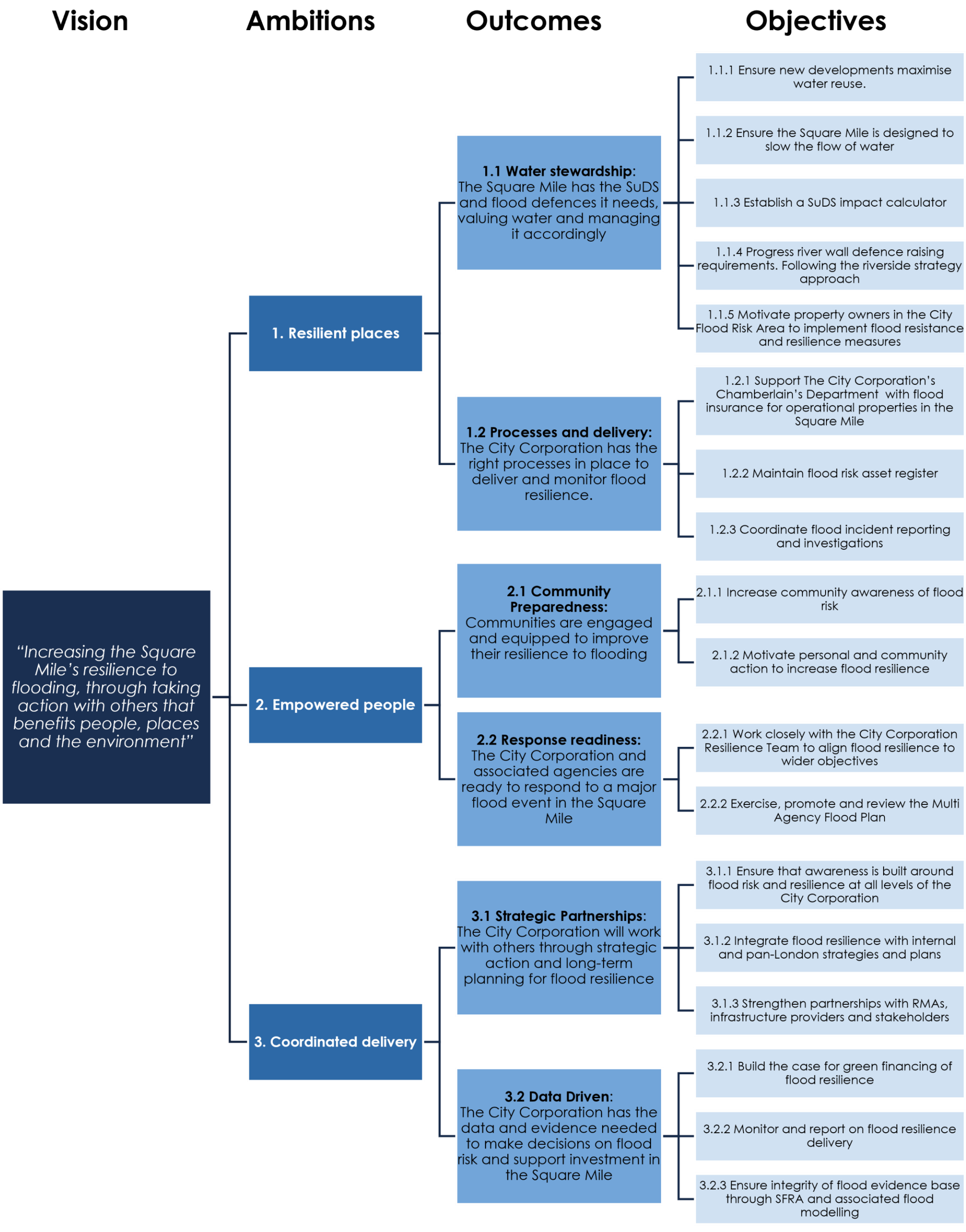
## Summary of Local Flood Risk Management Strategy

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 depicts the delivery framework of the LFRMS, which comprises a vision, ambitions, outcomes and objectives.

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



### Consultation process

This SEA screening is required to be reviewed by the three statutory consultees with environmental responsibilities in England: The Environment Agency, Natural England and Historic 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 SEA 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.

# 2. Identification of relevant policies

### Relevant policies, documents and legislation

All relevant international, national, regional and local policies and legislation which may impact the LFRMS are listed in Table 2 below.

Table 2: Relevant policies and legislation

| **International** |
|---|
| UNESCO World Heritage Convention (1972) |
| Convention for the Protection of the Architectural Heritage of Europe (1985) |
| EU Habitats Directive (1992) |
| The European Convention for the Protection of the Archaeological Heritage (revised 1992) |
| EU Water Framework Directive (2000) (WFD) |
| European SEA Directive (2001) |
| EU Floods Directive (2007) |
| EU Birds Directive (2009) |
| European Landscape Convention (2009) |
| **National** |
| Ancient Monuments and Archaeological Areas Act (1979) |
| Wildlife and Countryside Act (1981) |
| Environmental Protection Act (1990) |
| Planning (Listed Buildings & Conservation Areas) Act (1990) |
| Civil Contingencies Act (2004) |
| The Pitt Review (2007) |
| The SuDS Manual C753F (2007) |
| Climate Change Act (2008) |
| Flood and Water Management Act (2010) |
| Water Act (2014) |
| The Water Environment (WFD) (England and Wales) Regulations (2017) |
| The National Adaptation Programme 2018-2023 (2018) |

| |
|---|
| DEFRA: 25 year Environment Plan (2018) |
| Clean Air Strategy (2019) |
| Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (2019) |
| National Flood and Coastal Erosion Risk Management Strategy (2020) |
| Environment Act (2021) |
| National Planning Practice Guidance (revised 2024) |
| National Planning Policy Framework (revised 2025) |
| National Standard for Sustainable Drainage Systems (2025) |
| National Framework for Water Resources (2025) |
| **Regional** |
| Thames Catchment Flood Management Plan (2009) |
| Mayor of London's Climate Change Adaptation Strategy (2011) |
| London Regional Flood Risk Appraisal (2018) |
| The London Plan (2021) |
| Thames River Basin Management Plan (2022) |
| Sub regional integrated water management strategy for East London (2023) |
| Thames Estuary 2100 (TE2100) Plan (updated 2023) |
| Drainage and Wastewater Management Plan (2023) |
| London Climate Resilience Review (2024) |
| London Surface Water Strategy (2025) |
| **Local** |
| Biodiversity Action Plan (2021) |
| Strategic Flood Risk Assessment (2023) |
| Climate Action Strategy (2020) |
| Riverside Strategy (2021) |
| Corporate Plan (2024) |
| Transport Strategy second edition (2024) |
| Planning for Sustainability SPD (2025) |
| Multi Agency Flood Plan (2026) |
| Celebrating Heritage SPD (2026) |
| Air Quality SPD (2026) |
| City Plan 2040 |

# 3. Baseline information

## City of London characteristics

The City of London (the City), also known as the Square Mile, is the historic heart of London and one of the world's leading financial and business centres. It has an area of approximately 2.9 $km^2$ and is a highly urbanised area. The City has a residential population of approximately 8,600, with an additional work-day population of over 600,000, as well as millions of domestic and international visitors each year. The City is bordered by the boroughs of Camden, Islington, Hackney, Tower Hamlets and the City of

Westminster. It also borders Southwark and Lambeth on the south side of the River Thames.

The City has just under 33 hectares of open spaces which includes parks, gardens, churchyards and hard open spaces such as plazas and improvements to the highway. There are ten Sites of Importance for Nature Conservation (SINCs) within the City, one of metropolitan importance, two of borough importance and seven of local importance.

The City is well connected to the Greater London and beyond. It contains several strategic road routes and has an extensive public transport network with six mainline railway stations, 12 Underground and DLR stations, two Elizabeth Line stations and a high density and frequency of bus services. There are five bridges within the Square Mile boundary that cross the River Thames (London Bridge, Blackfriars, Southwark Bridge, Tower Bridge and Millennium Bridge).

## Chosen baseline information

### Biodiversity, flora and fauna

The City of London has just under 33 hectares of open spaces which includes parks, gardens, churchyards and hard open spaces such as plazas and improvements to the highway (see Figure 2). Most of the open spaces in the City are small, primarily consisting of pocket parks smaller than 0.1 hectares. Ground level open spaces are mostly the result of the Great Fire of London in 1666 and bomb damage from World War II which resulted in damaged or destroyed buildings being repurposed into open spaces for the public to enjoy. In addition to these open spaces, the City currently has nearly 73,000 $m^2$ of green roof spaces which in addition to biodiversity benefits provide rainwater attenuation to alleviate pressure on the combined drainage system during heavy rainfall.

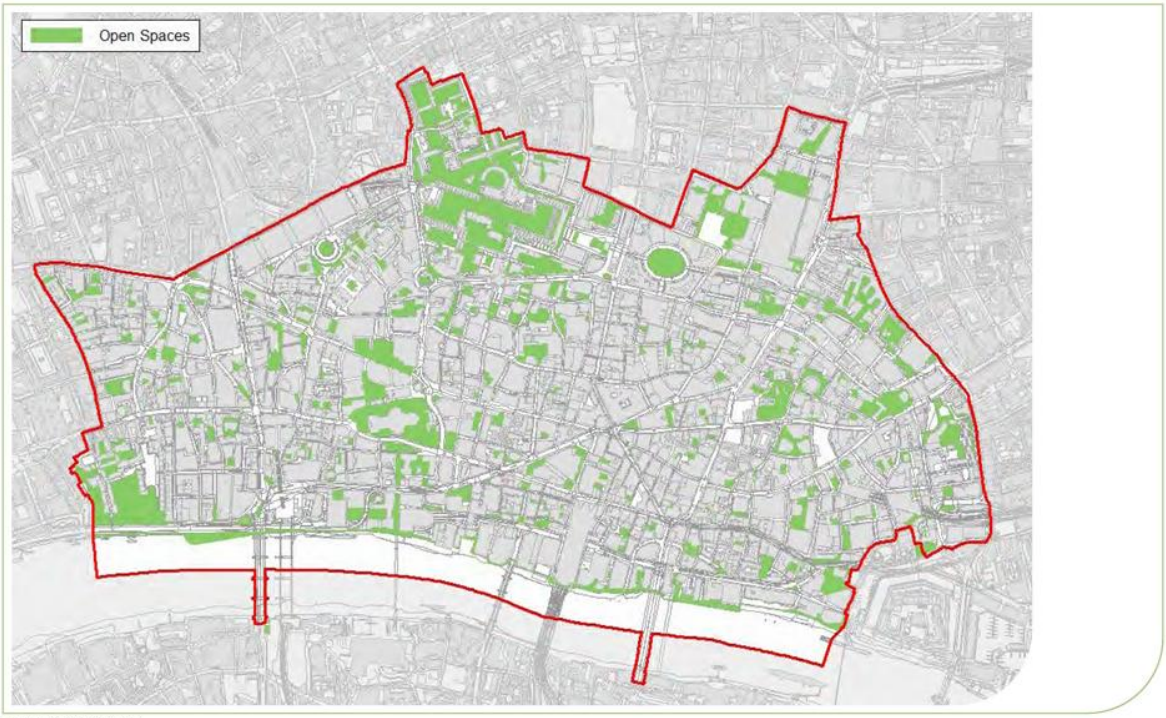



Figure 17: Open Spaces

**Figure 2 – open spaces in the Square Mile**

In the City the River Thames acts as the southern boundary stretching from Tower Pier in the east to Blackfriars Pier in the west. The Thames is London's largest wildlife corridor, supporting species and habitats not found anywhere else in the capital. The Thames Tideway Tunnel became operational in February 2025 and according to Tideway's monitoring, it has already diverted millions of tonnes of sewage away from the River Thames resulting in improved water quality for aquatic life. The widespread construction of Sustainable Drainage Systems (SuDS) in the Square Mile within new developments, retrofits and public realm improvements provide further benefits by reducing sewer overflows into the River Thames during periods of heavy rainfall.

The City Corporation has a Biodiversity Action Plan (BAP) which has a set of objectives and actions to support the wider City community in delivering strategically planned biodiversity networks for both the City and Greater London, taking into account both local and national priorities. A series of habitats and species have been identified in the BAP as being important to the City and plans have been put in place for their protection. The BAP identifies the following target species for the City: Black Redstart, Peregrine Falcon, Swift, House Sparrow, Bats, Bumblebees and Stag Beetles.

The City Plan 2040 sets out the vision, strategic priorities and policies for development in the City of London up to 2040. There are five policies (OS1, OS2, OS3, OS4 and OS5) relating to open spaces and green infrastructure which aim to protect and promote green spaces, provide urban greening, enhance biodiversity and deliver Biodiversity Net Gain (BNG).

**Population and human health**

All of the population and human health figures included in the following section have been obtained from the Office for National Statistics' (ONS) 2021 census data.

The residential population of the City of London is 8,600. Housing land use in the City is concentrated around four estates (The Barbican, Golden Lane, Middlesex Street and Mansell Street), with the remainder living in smaller residential clusters at Temples, Smithfield, Queenhithe, Botolph, Carter Lane and City West (see Figure 3).

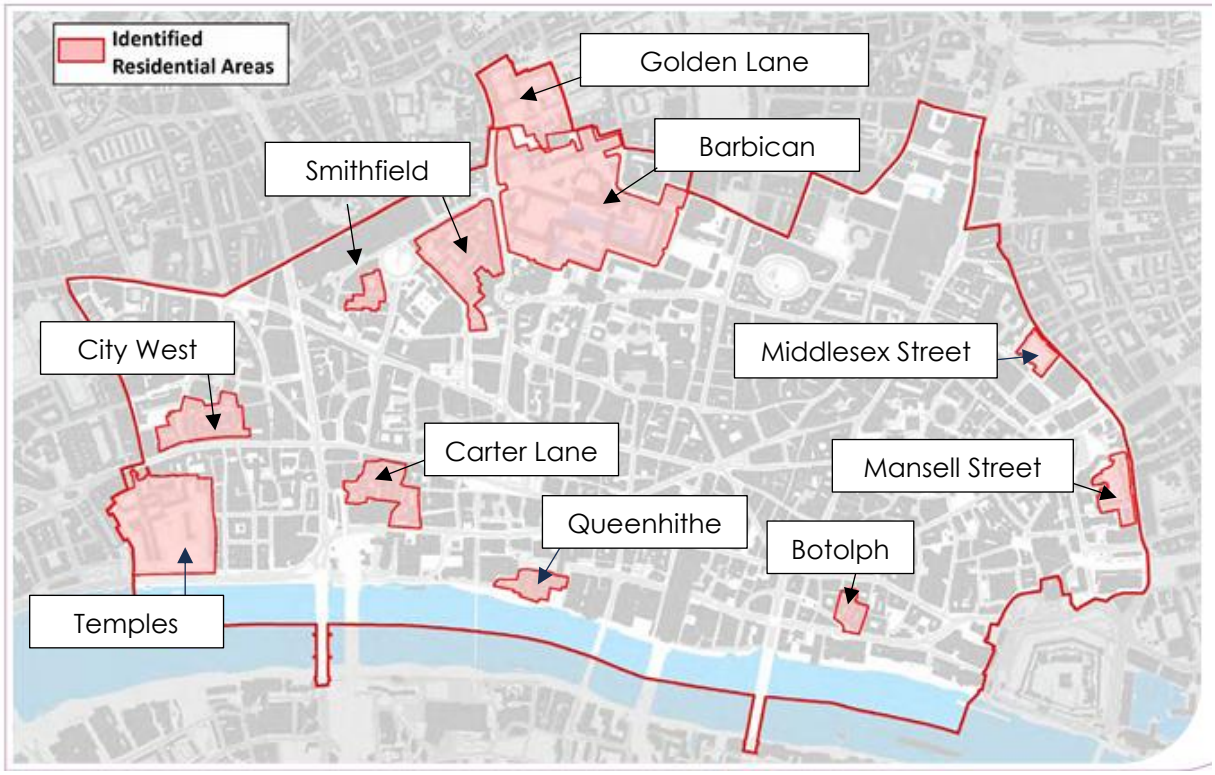



**Figure 3 – Residential areas in the City Flood Risk Area**

Queenhithe is the only residential area that is completely located within the City Flood Risk Area (FRA), the Temples is partly covered and Carter Lane and Botolph are bounded by the edge of the FRA. Pressure on the drainage network from residential properties within the City is relatively low however, the City's combined drainage network receives flows from a wide catchment area extending across across London Borough of Camden to the north and as far as Hammersmith and Fulham in the west. Population growth in this wider sewer catchment area will influence the drainage capacity requirements in the City.

The City has a predominantly working age population with a median age of 37 years, compared with 35 in London and 40 in England. People aged 25 to 34 years form the largest age group accounting for 25.8% of residents, whilst people aged over 65 make up 14.3% of the population. There are more male residents (55%) than female residents (45%) and 49.6% of residents were born

outside of the UK. The ethnic make-up of the City's population is 69.4% White, 16.8% Asian, 5.5% Mixed or multiple ethnic groups, 2.7% Black and 5.6% from other ethnic groups.

The 2021 census determined that 87.8% of people in the City stated that their health was very good or good, whereas 9.1% were in fair health, 2.4% in bad health and 0.7% in very bad health. The percentage of people who were identified as being disabled and limited, including a long-term health problem is at 11.8% as of 2021. This figure is lower than in Greater London or elsewhere nationally, but there are variations in health between neighbourhoods, reflecting the patterns of relative social and economic deprivation in the City. Poor health is more prevalent in the Portsoken and Golden Lane areas, where ill health and disability affect around 20% of households.

The City has a working-day population of approximately 600,000 as well as millions of domestic and international visitors every year. Whilst the City Flood Risk Area is relatively confined along the riverside and along the former Fleet Valley running along Farringdon Street, people who live, work and pass through these areas are exposed to the health, safety and wellbeing risks associated with flooding if it were to occur.

**Soil and geology**

Bedrock is the consolidated rock underlying the ground surface. The bedrock geology of the City comprises London Clay overlying Lambeth Group which is a mixture of sands, silts and clays which overlies Thanet Sand Formation and Upper Chalk. The thickness of London Clay ranges from 30-90 m across the central London area. Borehole logs held by the British Geological Survey for the City indicate that the London Clay is approximately 35 m thick and the Upper Chalk is encountered at 60-70 m below ground level. The risk of flooding from the chalk aquifer is considered to be negligible due to its management through the GARDIT system (General Aquifer Research, Development and Investigation Team). However, the City of London SFRA identifies that there are two areas of the City with increased potential for groundwater flooding from the River Terrace Deposits (RTD) aquifer (see Figure 4).

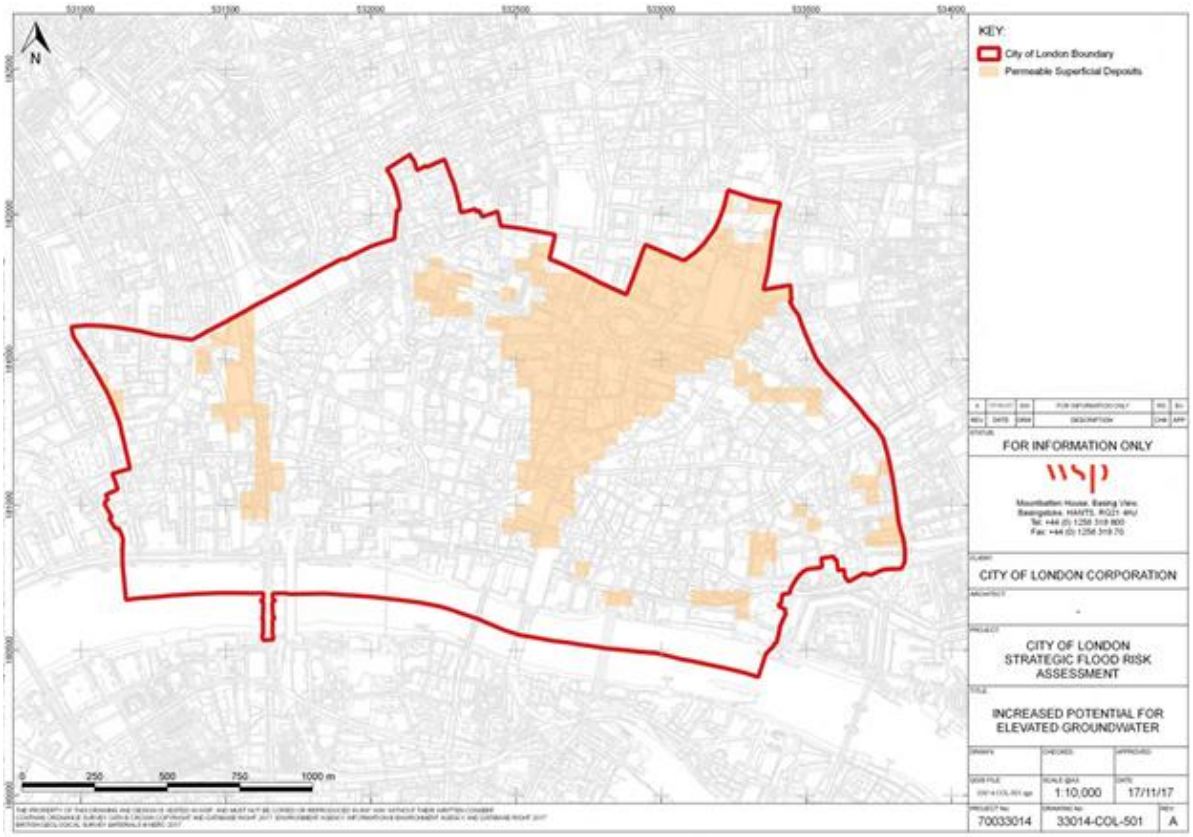



**Figure 4 – Increased potential for elevated groundwater map**

**Water**

The Water Framework Directive (WFD) is a set of regulations focused on ensuring good qualitative and quantitative health of the water environment. Under the WFD, each water body is assessed in terms of water quality and given an ecological and chemical status. The City's area falls within the Tidal Thames operational catchment for which the Environment Agency's 'Thames Middle' water body data is the most relevant. The WFD information for the Thames Middle is provided in Table 3.

Table 3: WFD information for the Thames Middle water body

| Water body name | Water body ID | Hydromorphological Designation | Ecological status (2022) | Chemical status (2019) |
|---|---|---|---|---|
| Thames Middle | GB530603911402 | Heavily modified | Moderate | Fail |

The City Corporation's Strategic Flood Risk Assessment provides detailed evidence and modelling of the various flood risks to the City (tidal/fluvial, surface water, sewer and groundwater). Whilst the City is generally at low risk of flooding due to its topography, some parts of the City are at risk from flooding from the River Thames and from surface water or sewer overflow in the former Fleet valley. Actions required to mitigate flood risk in the City extend across an area beyond its boundaries due to the wider combined

sewer catchment that the sewer system serves. Mitigation includes the installation of SuDS across the drainage catchment and the maintenance and improvement of the Thames Estuary flood defences. Further benefits can arise from the use of SuDS relating to water resource management through rainwater harvesting and reuse as well as water quality by reducing the likelihood of sewer discharges occurring into the River Thames.

**Air**

Although much improved, the City's air quality remains at a level where it impacts on health. The pollutants of current concern are nitrogen dioxide - a product of fuel combustion- and particulate matter $PM_{10}$ and $PM_{2.5}$ of which there are a wide range of sources.

The City Corporation is required by statute to monitor these air pollutants through a framework called London Local Air Quality Management (LLAQM). Following detailed air quality monitoring, the whole of the Square Mile was declared an Air Quality Management Area (AQMA) in January 2001 for annual mean concentrations of nitrogen dioxide and PM10, and 1-hour concentrations of nitrogen dioxide. This was due to levels in 2001 being higher than the national standards. The City Corporation's Air Quality Strategy 2025-2030 identifies that a significant improvement in air quality has been experienced across the Square Mile since the initial AQMA designation in 2001. The current national standards for $PM_{10}$ are met across the Square Mile, and the annual mean standard for nitrogen dioxide is only exceeded adjacent to the busiest roads. The new national standard for $PM_{2.5}$, 10µg/m$^3$ as an annual mean to be achieved by 2040, was met for the first time in 2023.

Whilst air quality is not directly associated with flood risks, works on flood defences and SuDS have the potential to affect air quality through increased traffic and pollution.

**Climatic factors**

The UK Climate Projections UKCP18 predict that the City will experience warmer wetter winters, hotter drier summers and more frequent extreme weather events and sea level rise.

A climate risk assessment undertaken to support the development of the City Corporation's Climate Action Strategy (CAS) identified the following six main risks from climate change to the City Corporation and Square Mile:

- Overheating
- Flooding
- Water stress
- Biodiversity losses
- Pests and diseases

- Trade, food and infrastructure

Increased rainfall intensity will impact the ability of the combined sewer network to effectively capture and convey surface water flows which will result in a greater area being at risk from flooding in the Square Mile.

Sea level is predicted to rise with consequential increases in flood risk from the tidally influenced River Thames. The TE2100 Plan identifies the need and potential options for upgrading or replacing the Thames barrier and river wall defences over the next century.

The frequency of severe droughts is likely to increase as a result of climate change, which can exacerbate the risk of surface water flooding where very dry ground cannot absorb rainfall resulting in increased runoff. Similarly ground movement and subsidence will damage drainage infrastructure.

In 2020, The City Corporation adopted the CAS which sets out how the organisation will achieve net zero, build climate resilience and champion sustainable growth, both in the UK and globally. The CAS details how the City Corporation has committed to:

- Achieve net zero carbon emissions from its own operations by 2027
- Achieve net zero carbon emissions across all its activities, including investments and supply chain, by 2040
- Support the Square Mile to reach net zero by 2040
- Build climate resilience in its buildings, public spaces and infrastructure

Since 2020, the CAS has been delivered through a programme of 13 projects which are fully funded until 2027.

**Cultural heritage and landscape**

The City of London has a distinct character as a result of its long history being home to some of the most iconic architecture – both historic and modern. This has meant that the City has a townscape of great complexity and diversity. Having developed within just one square mile of land, and having always been a prosperous centre for commerce and finance, development of the City has been intensive and uncoordinated, dictated by the prevailing needs of individual owners or occupiers rather than any masterplan. Subsequently, the majority of the Square Mile is characterised of extreme and endless variety in building style, heights, use and periods.

The City contains a high concentration of heritage assets which include over 600 listed buildings, 27 conservation areas, 48 scheduled monuments and 4 registered parks and gardens within the Square Mile (see figure 5). Many of these heritage assets contribute significantly to the City's skyline, namely St Paul's Cathedral and the Monument, whilst the City also provides part of the backdrop and setting for the Tower of London World Heritage Site. Today, the City has become internationally renowned for its high-rise architecture.

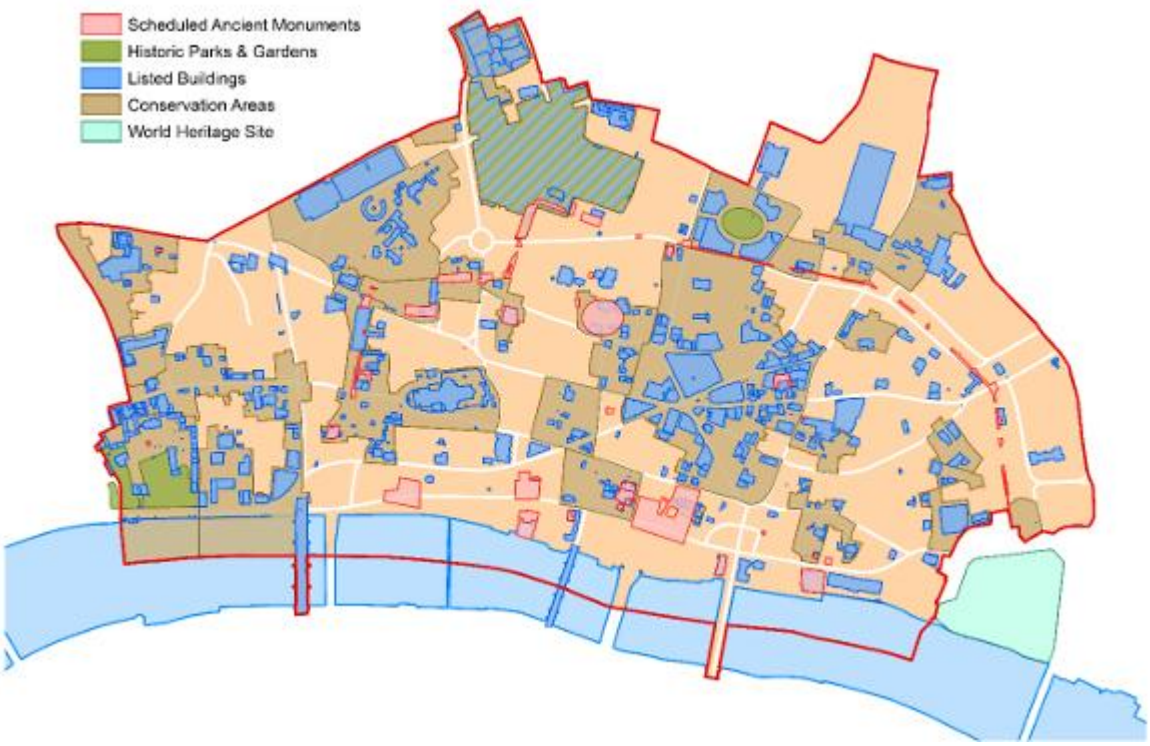



**Figure 5 – Heritage assets in the City**

The City Flood Risk Area includes parts of Temples, inner Temple and middle Temple gardens, Whitefriars and Fleet Street conservation areas and 60 listed building and structures. Some structures and remains of archaeological importance, such as Baynard Castle and Queenhithe Dock, are Scheduled Ancient Monuments and are therefore subject to statutory controls for their protection. Historic England provides guidance on the issues associated with flooding in historic buildings.

With regard to landscape, the City and its surrounding area contain many famous landmarks that are visible from viewpoints across London (see figure 6). Views of the City's skyline from the River Thames are especially notable and certain local views of St. Paul's Cathedral have been protected successfully by the City Corporation's 'St. Paul's Heights' code since the 1930s. Landmarks such as St. Paul's Cathedral, the Monument and the Tower of London are internationally renowned and add to the City's "world class" status. As such the City of London seeks to protect and enhance significant City and London views of important buildings, townscapes and skylines, making a substantial contribution to protecting the overall heritage of City landmarks.

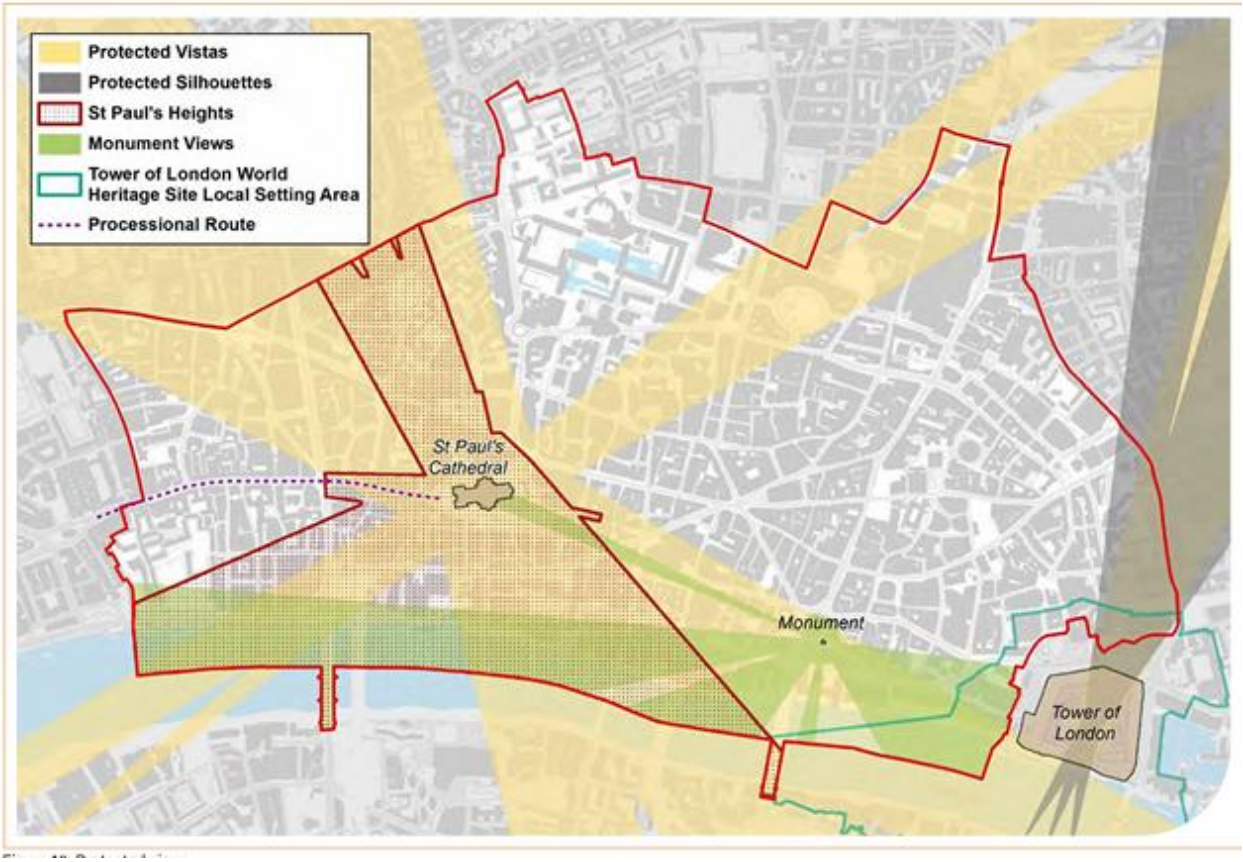



**Figure 6 – protected views**

Views of the river from the Monument should be protected therefore works to flood defences should be designed so as not to restrict views of the river. The relevant river prospect views are River Prospects - views from Tower Bridge, London Bridge, Southwark Bridge Millennium Bridge, South Bank (Gabriel's Wharf), Waterloo Bridge and Hungerford Bridge. For these views the management of the foreground and middle ground and the relationship with landmark features in the distance are all important. Development in the foreground or middle ground that is overly intrusive, unsightly or prominent to the detriment of the view as a whole should be refused.

# 4. Identification of environmental issues

## Local environmental issues

The following environmental issues that are relevant to the LFRMS have been identified by examining the policies listed in Table 2 and analysing the baseline information set out in the preceding section. The issues are presented by environmental theme and form the basis for the SEA objectives developed under Task A4.

### Biodiversity, flora and fauna

- Areas of green space in the City are limited in comparison to buildings and infrastructure.

- These spaces are vital for supporting the Square Mile's ecology and biodiversity including protected species as well as providing rainwater attenuation, urban cooling, recreation and health benefits to the residents, workers and visitors who use them.
- The LFRMS should protect and enhance habitats identified in the BAP and ensure that any flood resilience works respect the existing biodiversity in adjacent areas

**Population and human health**

- Four residential areas are located within or close to the City FRA, plus a significant number of people who work and visit the Square Mile will temporarily occupy areas at risk from flooding.
- Floodwaters and flood damage pose a risk to people's health, safety and wellbeing.
- The LFRMS should engage with a range of at-risk communities to build knowledge and awareness of flood resilience.
- The LFRMS should contribute to the reduction of flood risk in the City FRA.

**Water**

- The water quality of the River Thames must be maintained to support its aquatic species and habitats.
- The Thames Tideway Tunnel and SuDS protect the water quality of the River Thames by reducing the amount of rainwater entering the combined sewer system thus reducing the potential for sewer discharges.
- The LFRMS should reduce combined sewer outflow discharges into the Thames.
- The LFRMS should encourage the management of rainwater as a valuable resource through rainwater harvesting and recycling.

**Climatic factors**

- Flood risk in the City is likely to increase as a result of climate change causing more frequent rainfall, sea level rise and more frequent extreme weather events.
- The City's buildings and spaces must be designed and maintained to be resilient to flooding, overheating, water stress, biodiversity loss, pests and diseases and disruptions to food trade and infrastructure.
- The LFRMS must specifically account for and address the impacts of climate change on flood risk.

**Cultural heritage and landscape**

- Flooding can cause permanent damage to the historical and cultural assets.
- Flood resilience works and associated infrastructure development could have adverse impacts on the significance of heritage assets and their settings.
- The LFRMS should seek to conserve and enhance the significance of relevant historic assets and their settings when any flood resilience works occur.

# 5. SEA objectives

The SEA objectives set out below have been developed in response to the identified environmental issues. The objectives are intended to be used to test the LFRMS outcomes against an environmental baseline and to identify any measures required to mitigate adverse effects or enhance positive ones.

**SEA1:** Protect, maintain and enhance green spaces to improve biodiversity and to help mitigate the effects of climate change.

**SEA2:** Protect the health, wellbeing and safety of residents, workers and visitors

**SEA3:** Protect the water quality of the River Thames and water resources of the Square Mile.

**SEA4:** Promote sustainable development to improve resilience to the impacts of climate change.

**SEA5:** Protect existing property and infrastructure, including cultural and historic assets by ensuring they are made resilient to flooding and the impacts of climate change.

# 6. Screening analysis of the Local Flood Risk Management Strategy

## Screening analysis

The outcomes of the LFRMS have been assessed against the SEA objectives using the SEA framework. The scoring criteria for the assessment is shown in Table 4 and a summary of the screening analysis findings is shown in Table 5.

Table 4: Scoring criteria

| | |
|---|---|
| **++** | Major positive effect on SEA objective |
| **+** | Minor positive effect on SEA objective |
| **0** | Neutral effect on the SEA objective and/or dependent on implementation |
| **-** | Minor negative on SEA objective |
| **- -** | Major negative effect on SEA objective |
| **?** | Uncertain |

Table 5: Screening analysis findings summary

| | | **SEA objective number** | | | | |
|---|---|---|---|---|---|---|
| | | **SEA1** | **SEA2** | **SEA3** | **SEA4** | **SEA5** |
| **LFRMS outcomes** | **1.1** | ++ | ++ | ++ | ++ | + |
| | **1.2** | 0 | + | 0 | 0 | + |
| | **2.1** | 0 | ++ | 0 | 0 | + |
| | **2.2** | 0 | + | 0 | 0 | 0 |
| | **3.1** | + | + | + | + | + |
| | **3.2** | 0 | 0 | + | + | + |

## Screening analysis outcomes

### LFRMS Outcome 1.1 – Water Stewardship

This outcome has the most direct and wide-ranging environmental implications of all six outcomes and is expected to generate major positive effects across four of the five SEA objectives. There were no negative effects identified; therefore Outcome 1.1 can be screened out at this stage.

| Effect on SEA objective | SEA objective | Justification |
|---|---|---|
| **++** | SEA1 | Objectives 1.1.1-1.1.3 directly promote the widespread installation of SuDS across the Square Mile. SuDS schemes can incorporate green infrastructure that enhances biodiversity, protect BAP target species habitats and increase the Square Mile's limited green space, contributing to the BNG requirements of the Environment Act (2021) and City Plan 2040 policies OS1-OS5. |
| **++** | SEA2 | Collectively all of the objectives reduce the risk and severity of flooding across the City Flood Risk Area, directly protecting the health, safety and wellbeing of residents, the 600,000+ daily workers and the millions of visitors who occupy the Square Mile. Objective 1.1.5 additionally |

| | | |
|---|---|---|
| | | empowers property owners to take individual flood resilience action, extending the protective benefit beyond publicly managed assets. |
| ++ | SEA3 | Objective 1.1.1 promotes rainwater harvesting and reuse across new developments, directly reducing the volume of surface water entering the combined sewer network. Objectives 1.1.2 and 1.1.3 incentivise the widespread adoption of SuDS, which reduces sewer overflow frequency and the associated discharge of untreated wastewater into the Thames. Together these measures support the WFD objective of improving the Thames Middle water body beyond its current Fail chemical status. |
| ++ | SEA4 | Objective 1.1.4 directly addresses the long-term threat of tidal and fluvial flooding by progressing river wall defence raising in accordance with the Riverside Strategy and TE2100 Plan. Objectives 1.1.1-1.1.3 support the delivery of SuDS which help adapt the built environment to projected increases in rainfall intensity and sea level rise under UKCP18 projections. These measures together strengthen the climate resilience of the Square Mile's buildings and infrastructure in line with the Climate Action Strategy (2020). |
| + | SEA5 | Objective 1.1.4, which involves the raising of river wall defences along the Thames, could have an effect on the character of the riverside environment and on protected river prospect views if not sensitively designed. Works near or within the conservation areas and listed buildings and structures in the City Flood Risk Area will need to be designed in accordance with the Celebrating Heritage SPD (2026). Where appropriately designed, flood defence improvements protect heritage assets from flood damage, generating a net positive effect on this SEA objective. |

**LFRMS Outcome 1.2 – Processes and Delivery**

This outcome is primarily operational and governance-focused in nature, with more limited direct environmental interactions than Outcome 1.1. There were no negative effects identified; therefore Outcome 1.2 can be screened out at this stage.

| Effect on SEA objective | SEA objective | Justification |
|---|---|---|
| **0** | SEA1 | Outcome 1.2 focuses on internal governance, asset management and flood incident reporting processes rather than direct physical interventions to the environment. It has little direct correlation with the protection or enhancement of green spaces or biodiversity. |
| **+** | SEA2 | Objective 1.2.1 supports flood insurance for operational properties in the City Flood Risk Area, providing a direct financial protection mechanism for property owners in flood-prone areas. Objective 1.2.2 (flood risk asset register) and 1.2.3 (flood incident reporting and investigation) together improve the City Corporation's ability to understand, track and respond to flood events, reducing the duration and severity of impact on the residents, workers and visitors of the Square Mile. |
| **0** | SEA3 | This outcome primarily relates to internal organisational processes and asset management and has no direct or indirect correlation with the water quality of the River Thames or the management of water resources in the Square Mile. |
| **0** | SEA4 | This outcome primarily relates to internal organisational processes and asset management and has no direct or indirect correlation with promoting sustainable development or improving the climate resilience of the Square Mile's built environment. |
| **+** | SEA5 | Objective 1.2.2, the maintenance of a comprehensive flood risk asset register, ensures that flood defences in the vicinity of listed buildings, scheduled monuments and conservation areas are properly identified and regularly maintained. This reduces the risk of defence failure and consequent flood damage to heritage assets, supporting the preservation of the City's built and archaeological heritage. |

**LFRMS Outcome 2.1 – Community Preparedness**

This outcome is engagement and behaviour-change focused. Its most significant environmental contribution is the direct protection of the health,

safety and wellbeing of those at risk from flooding. There were no negative effects identified; therefore Outcome 2.1 can be screened out at this stage.

| Effect on SEA objective | SEA objective | Justification |
|---|---|---|
| **0** | SEA1 | This outcome is focused on community engagement and individual preparedness rather than direct physical interventions to green infrastructure or biodiversity. It has no direct correlation with the protection or enhancement of green spaces. |
| **++** | SEA2 | Objectives 2.1.1 and 2.1.2 directly target the health, safety and wellbeing of those at risk from flooding. Increasing community awareness of flood risk (2.1.1) helps individuals understand their exposure and take preparatory action, reducing harm during a flood event. Motivating personal and community flood resilience action (2.1.2) empowers vulnerable households to protect themselves and their properties, directly delivering against the SEA2 objective. |
| **0** | SEA3 | This outcome is focused on community preparedness and personal flood resilience and has no direct correlation with the water quality of the River Thames or the management of the combined sewer network and water resources. |
| **0** | SEA4 | This outcome is focused on community preparedness and personal flood resilience and has no direct correlation with promoting sustainable development or improving climate resilience within new developments. |
| **+** | SEA5 | Community awareness and engagement activities delivered through objectives 2.1.1 and 2.1.2 can be used to highlight the significance of heritage assets at risk from flooding in the City Flood Risk Area. Greater community awareness of the vulnerability of the City's heritage to flood risk can build support for flood resilience investment in areas where listed buildings, scheduled monuments and conservation areas are present. |

**LFRMS Outcome 2.2 – Response Readiness**

This outcome is focused on emergency preparedness and inter-agency coordination. Its environmental interactions are limited to the indirect

reduction of harm to people during a flood event. There were no negative effects identified; therefore Outcome 2.2 can be screened out at this stage.

| Effect on SEA objective | SEA objective | Justification |
|---|---|---|
| **0** | SEA1 | This outcome is focused on emergency preparedness and inter-agency coordination rather than direct physical interventions. It has no direct correlation with the protection or enhancement of green spaces or biodiversity within the Square Mile. |
| **+** | SEA2 | Objectives 2.2.1 and 2.2.2 support the City Corporation and partner agencies in being prepared and capable of mounting an effective response to a major flood event. By aligning flood resilience with the City Corporation's wider Resilience Team objectives (2.2.1) and regularly exercising and reviewing the Multi Agency Flood Plan (2.2.2), the risk of harm to the people who live, work and visit the Square Mile during a flood event is reduced. |
| **0** | SEA3 | This outcome relates to emergency response planning and inter-agency coordination and has no direct correlation with the water quality of the River Thames or the management of water resources in the Square Mile. |
| **0** | SEA4 | This outcome relates to emergency response planning and inter-agency coordination and has no direct correlation with promoting sustainable development or improving the climate resilience of the Square Mile's built environment. |
| **0** | SEA5 | This outcome relates to emergency response planning and has no direct correlation with the protection of heritage assets from flooding. |

**LFRMS Outcome 3.1 – Strategic Partnerships**

This outcome is strategic and coordinative in nature and is anticipated to generate minor positive effects across all five SEA objectives. There were no negative effects identified; therefore Outcome 3.1 can be screened out at this stage.

| Effect on SEA objective | SEA objective | Justification |
|---|---|---|
| + | SEA1 | Objective 3.1.2 commits to integrating flood resilience with internal and pan-London strategies and plans, including the City Plan 2040, the London Plan and the London Surface Water Strategy (2025). This integration helps ensure that green infrastructure, SuDS and BNG requirements are embedded consistently across the planning and development system, providing long-term protection for biodiversity and green space in the Square Mile. |
| + | SEA2 | Objective 3.1.3 strengthens partnerships with Risk Management Authorities, infrastructure providers and other stakeholders. A coordinated multi-agency approach ensures that a broader range of flood risks are addressed comprehensively, providing more effective protection to the health and safety of the Square Mile's residents, workers and visitors. |
| + | SEA3 | Objective 3.1.2 promotes cross-organisational coordination which ensures that flood management actions are consistent with WFD objectives and that the management of the combined sewer catchment - which extends well beyond the Square Mile's boundaries into neighbouring boroughs - is approached coherently across partner organisations to support improvements to the River Thames. |
| + | SEA4 | Objectives 3.1.1-3.1.3 collectively build the institutional knowledge and strategic alignment across organisations needed to deliver long-term flood resilience. These objectives support the wider ambition to promote sustainable, climate-resilient development in the Square Mile consistent with the Climate Action Strategy (2020) and London Climate Resilience Review (2024). |
| + | SEA5 | Objective 3.1.2, which promotes integration with internal City Corporation strategies and plans, supports alignment of flood risk management with the Celebrating Heritage SPD (2026). This ensures that flood resilience considerations for heritage assets at risk within the City Flood Risk Area are embedded in long-term strategic planning. |

**LFRMS Outcome 3.2 – Data Driven**

This outcome underpins the evidence, monitoring and investment basis for all other LFRMS actions. There were no negative effects identified; therefore Outcome 3.2 can be screened out at this stage.

| Effect on SEA objective | SEA objective | Justification |
|---|---|---|
| **0** | SEA1 | This outcome focuses on the evidence base, financial investment and flood modelling capacity required to support decision-making on flood risk. It has no direct correlation with green space protection or biodiversity enhancement, although improved flood evidence (3.2.3) could indirectly inform decisions that better protect ecologically sensitive areas from the inadvertent impacts of flood management works. |
| **0** | SEA2 | This outcome focuses on the evidence base and investment case for flood risk management rather than direct actions to protect people. While improved flood modelling and monitoring data will ultimately support better-informed flood risk interventions, it has no direct immediate positive effect on the health, safety and wellbeing of residents, workers and visitors. |
| **+** | SEA3 | Objective 3.2.1 supports the development of green financing mechanisms for flood resilience, which could unlock investment in SuDS and blue-green infrastructure across the wider drainage catchment. Increased SuDS coverage reduces the volume of surface water entering the combined sewer network, thereby reducing the frequency of combined sewer overflow events into the Thames and supporting improvement in the Thames Middle water body WFD status. |
| **+** | SEA4 | Objective 3.2.3 ensures the currency and integrity of the SFRA and associated flood modelling, which underpins all flood risk planning and development management decisions in the City. Maintaining a robust, up-to-date evidence base is essential to ensuring that the City's built environment is designed and adapted to be resilient to the future flood risk arising from climate change. |

| | | |
|---|---|---|
| + | SEA5 | Objective 3.2.2 commits to monitoring and reporting on flood resilience delivery across the Square Mile. Regular monitoring enables the City Corporation to identify where flood resilience in the vicinity of heritage assets is falling short and to direct investment accordingly, supporting the long-term protection of listed buildings, scheduled monuments and conservation areas - including those within the City Flood Risk Area - from flood damage. |

# 7. Conclusions

This SEA screening report indicates that the proposed LFRMS outcomes are not likely to cause any negative effects on the environmental issues identified for the City. All of the outcomes are likely to have a potential positive effect on at least one of the SEA objectives. It can therefore be concluded that the LFRMS has considered the environmental impacts of implementing its actions. As a result, the LFRMS does not need to progress to Stage B and a full SEA is not required.

# 8. 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 SEA screening will be carried out on any changes that emerge from further evidence or consultation comments.