

Local Flood Risk Management Strategy

Habitats Regulations Assessment Screening Report

REVISION HISTORY

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Version	Date	Description	Prepared	Approved
1.0	October 2023	First full draft for client	CA	MM

EXECUTIVE SUMMARY

A Habitats Regulations Assessment (HRA) is required to be undertaken whenever a plan or programme is being implemented to ensure that the plan or programme poses no negative impacts on Natura 2000 sites. These designated sites include Ramsar Sites, Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). This HRA serves to review whether implementing the actions associated with the proposed Local Flood Risk Management Strategy (LFRMS) could pose any likely negative effects on habitats and protected areas within and in the vicinity of the London Borough of Hillingdon (Hillingdon). There are three stages of the HRA process, this document represents the Screening Assessment, which is the first stage. Through undertaking a HRA Screening Assessment, it is possible to understand the potential risks to the Natura 2000 sites in or in proximity to Hillingdon that could be brought about by implementing the Strategic Objectives of the LFRMS and associated Action Plan. As a result, the outcome of this HRA Screening Assessment can inform whether the LFRMS requires further investigation and progression of the HRA to the second stage.

Although there are no Natura 2000 sites located within Hillingdon, it is necessary to consider the sites that are in the vicinity of the borough to ensure sites that share hydraulic connections between natural ecosystems are not overlooked. Therefore, the following six Natura 2000 sites have been included within this HRA Screening Assessment: Burnham Beeches, Richmond Park, Wimbledon Common and Windsor Forest & Great Park (SACs) in addition to South West London Waterbodies and Thames Estuary & Marshes (Ramsar sites). Following the identification of these designated sites and analysis of the sites' habitats and species, a screening exercise took place whereby each LFRMS Strategic Objective was individually assessed against each designated site. The purpose of this exercise was to understand whether implementation of the LFRMS would cause any negative impacts on the identified designated sites.

To conclude the evaluation process, it is evident that the proposed LFRMS Strategic Objectives do not pose any negative impacts on the six identified designated sites. On the contrary, implementation of the LFRMS Strategic Objectives brings about opportunities for collaboration to support the improvement of the ecological status of the identified designated sites through environmental stewardship and implementation of blue-green infrastructure. Therefore, this HRA Screening Report evidences that the proposed Strategic Objectives are not likely to pose negative impacts on the designated sites in the vicinity of Hillingdon. As a result, it is not required to progress the LFRMS to the second stage of the HRA process.

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ACRONYMS AND ABBREVIATIONS

Abbreviation	Definition
DEFRA	Department for Environment, Food & Rural
	Affairs
FWMA	Flood and Water Management Act, 2010
Hillingdon	The London Borough of Hillingdon
HRA	Habitats Regulations Assessment
JNCC	Joint Nature Conservation Committee
LFRMS	Local Flood Risk Management Strategy
LLFA	Lead Local Flood Authority
NE	Natural England
Ramsar	Ramsar sites are wetlands of international
	importance, designated under the Ramsar
	Convention.
RMA	Risk Management Authority
SAC	Special Area of Conservation
SPA	Special Protection Area
SSSIs	Sites of Special Scientific Interest

1 Introduction

1.1 Purpose of screening

The purpose of a Habitats Regulations Assessment (HRA) is to assess the effects of a plan or programme against the conservation objectives of a European designated site for any likely significant effects in accordance with the <u>Conservation of Habitats and Species (Amendment) Regulations (2019)</u>. By undertaking a HRA, it can be understood whether the proposed documentation would negatively impact the integrity of the conservation site. A Local Flood Risk Management Strategy (LFRMS) is considered a plan and therefore a HRA is required to ensure that the proposed LFRMS does not pose adverse impacts to the identified Natura 2000 sites within the vicinity of the London Borough of Hillingdon (Hillingdon).

European Natura 2000 sites are a network of locations with environmental protection status and include:

- Special Areas of Conservation (SACs): areas designated under the <u>European Union's Habitats</u>
 <u>Directive, 1992</u> 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 <u>European Wild Birds Directive</u>, 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 <u>Ramsar Convention</u>, 1976 Ramsar sites may also include riparian zones, such as the banks of a watercourse.

This HRA Screening Report does not include assessment of Sites of Special Scientific Interest (SSSIs). SSSIs are areas of land and water that are considered to best represent natural heritage in terms of their flora, fauna, geology and geomorphology. However, it is not within the remit of a HRA Screening Report to assess the effects of a proposed plan on SSSIs in accordance with HRA legislation. Therefore, SSSIs have not been included within this HRA assessment.

All Natura 2000 sites will henceforth be referred to in this Report as 'designated sites' for ease of reference.

1.2 Methodology

The Department for Environment, Food & Rural Affairs (DEFRA) collaborated with Natural England (NE), the Welsh Government and Natural Resources Wales to publish <u>guidance on HRAs, 2021</u>. In accordance with the guidance, three stages must be undertaken to complete a full HRA. These three stages are detailed in *Table 1-1*.

Table 1-1 Summary of HRA Stages

	HRA Stage	Purpose
	Stage 1 – Screening Assessment	To check if the proposal 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 detail and identify ways to avoid or minimise any effects.
	Stage 3 – Derogation Assessment	To consider if proposals would have an adverse effect on a Designated Site quality for exemption.

This document represents the first stage of the HRA process – the Screening Assessment. By assessing the potential impacts of the proposed LFRMS, this Screening Report will determine whether a full HRA is required.

1.3 Consultation process

It is required that this HRA Screening Report undergoes a statutory consultation process involving NE as statutory consultee. NE will review and provide feedback on the scope and results of this HRA Screening Report during a six-week period from December 2023 to January 2024. As part of this process, the statutory consultees will have sight of the consultation questions within this HRA Screening Report, which are detailed in *Section 1.4*. Any feedback provided will be integrated into an updated version of this document. Following this, a public consultation will be undertaken during a six-week period from January to February 2024, during which members of the public, internal stakeholders and strategic stakeholders will be able to provide comment on this HRA Screening Report. Similarly, suggested amendments will be reviewed and incorporated into the final version prior to finalisation of this document.

1.4 HRA consultation questions

In line with Section 1.3, those consulted on this HRA Screening Report will be asked specific questions to ensure that this Screening Assessment satisfies the HRA requirements. The below eight questions correspond to the first task of the HRA process, as presented in Table 1-1.

Identifying relevant sites

- 1. Do you feel that we have included all the designated sites that may be significantly affected by the implementation of the LFRMS? If not, please state any additional sites that you believe should be included.
- **2.** Do you feel that we have included all the relevant information for each of the identified designated sites?

Screening analysis:

- **3.** Do you have any comments on the method of assessment of the HRA sites against the LFRMS Strategic Objectives?
- **4.** Do you agree with the screening analysis for each of the LFRMS Objectives? If not, please explain why you would screen a certain LFRMS Objective differently.

Conclusions and further comments:

- 5. Do you have any comments on the conclusions within this HRA Screening Report of the LFRMS?
- 6. Do you have any additional comments or suggestions for this HRA Screening Report?

1.5 Summary of Local Flood Risk Management Strategy

The <u>Flood and Water Management Act 2010 (FWMA)</u> brought about the role of the Lead Local Flood Authority (LLFA), which is the unitary authority or county council. Hillingdon undertakes the role of the LLFA and, under Section 9 of the FWMA, is responsible for developing, maintaining, applying and monitoring a Strategy for local flood risk management in its area. The purpose of a LFRMS is to assess local flood risks, set out the roles and responsibilities of relevant risk management authorities (RMAs) and develop Strategic Objectives to manage local flood risk. As stipulated by the FWMA, a LFRMS must be updated every six years, or as and when there are any changes to policy or legislation. The three documents associated with the LFRMS include the detailed Action Plan which sets out measures to achieve the Strategic Objectives, a Strategic Environmental Assessment and this HRA Screening Report.

Five Strategic Objectives have been identified in alignment with the Environment Agency's National Flood and Coastal Erosion Risk Management Strategy and local Council priorities:

Figure 1-1 LFRMS Strategic Objectives

STRATEGIC OBJECTIVE A:

Improve knowledge of flood risks in the London Borough of Hillingdon.

STRATEGIC OBJECTIVE B:

Improve the collaboration of Risk Management Authorities, and understanding of roles and responsibilities, to manage flood risk effectively

STRATEGIC OBJECTIVE C:

Identify and implement opportunities for flood risk management.

STRATEGIC OBJECTIVE D:

Ensure that development within the London Borough of Hillingdon accounts for and mitigates flood risk.

STRATEGIC OBJECTIVE E:

Engage with communities to develop the awareness of flood risk in local areas and improve their resilience.

2 SITE INFORMATION

2.1 Introduction to the sites

Within the first stage of the HRA process (Screening Assessment), the first task is to identify whether there are any designated sites within or in close proximity to Hillingdon. A buffer distance of 10km was applied to determine whether a given site is located near enough to Hillingdon to be assessed as part of the HRA process. No designated sites were identified within Hillingdon. However, four SAC sites and two Ramsar sites were identified within 10km of the borough boundary; these designated sites are illustrated in Figure 2-1. Investigation has been undertaken to ensure that the LFRMS poses no potential adverse impacts to the identified designated sites. More information on the individual sites is detailed in *Section 2.2*.

2.2 Sites within Hillingdon

No designated Natura 2000 sites were identified within Hillingdon.

2.3 Sites in proximity to Hillingdon

Six sites have been identified as being in close proximity to Hillingdon. These are:

- Site 1: Burnham Beeches
- Site 2: Richmond Park
- Site 3: Wimbledon Common
- Site 4: Windsor Forest & Great Park
- Site 5: South West London Waterbodies
- Site 6: Thames Estuary & Marshes

Burnham Beeches, Richmond Park and South West London Waterbodies are all located either wholly or partially within Hillingdon. Wimbledon Common has been included within this screening assessment because it is connected hydraulically to Richmond Park via the Beverley Brook. The Thames Estuary & Marshes have been included because they are where the River Thames meets the waters of the North Sea and are hydraulically connected to Hillingdon via the River Thames.

The following six tables detail a full breakdown of information for each site, including species and habitat details, general site character and current conditions and threats. Information has been collated from the following sources:

- Joint Nature Conservation Committee (JNCC)
- Natural England
- DEFRA's Magic Map database

Table 2-1 Burnham Beeches summary

Site name	Burnham Beeches
Site designation	SAC site
EU code	UK0030034
Area (ha)	384

Qualifying species and/or habitat features	H9120 Atlantic acidophilous beech forests with <i>llex</i>	
	and sometimes also <i>Taxus</i> in the shrublayer	
	(Quercion robori-petraeae or Ilici-Fagenion)	
General site character (% area)	Heath, Scrub, Maquis and Garrigue, Phygrana (5%)	
	Broad-leaved deciduous woodland (90%)	
	Coniferous woodland (5%)	
Current condition and threats	1. Air pollution (risk of atmospheric nitrogen	
	deposition) affecting H9120	
	2. Public access/disturbance affecting H9120	
	3. Habitat fragmentation affecting H9120	
	4. Deer affecting H9120	
	5. Species decline affecting H9120	
	6. Invasive species affecting H9120	
Supplementary evidence	Site Improvement Plan – Burnham Beeches	
	Conservation Objectives for Burnham Beeches	
	JNCC Burnham Beeches – SAC	

Table 2-2 Richmond Park summary

Site name	Richmond Park
Site designation	SAC site
EU code	UK0030246
Area (ha)	846
Qualifying species and/or habitat features	S1083 Stag beetle, Lucanus cervus
General site character (% area)	 Inland water bodies (Standing water, Running water) (1.5%)
	 Bogs, Marshes, Water fringed vegetation, Fens (0.5%)
	 Heath, Scrub, Maquis and Garrigue, Phygrana (25%)
	 Dry grassland, Steppes (18%)
	 Humid grassland, Mesophile grassland (5%)
	 Improved grassland (20%)
	 Broad-leaved deciduous woodland (25%)
	 Mixed woodland (5%)
Current condition and threats	There are no current issues affecting the Natura 2000
	features on this site.
	The Richmond Park Management Plan should continue to
	be periodically reviewed to ensure the continuing
	availability of decaying wood habitat.
Supplementary evidence	Site Improvement Plan – Richmond Park
	Conservation Objectives for Richmond Park
	JNCC Richmond – SAC

Table 2-3 Wimbledon Common summary

Site name	Wimbledon Common
Site designation	SAC site

EU code	UK0030301	
Area (ha)	351	
Qualifying species and/or habitat features	 S1083 Stag beetle, Lucanus cervus 	
	H4010 Northern Atlantic wet heaths with Erica	
	tetralix	
	H4030 European dry heaths	
General site character (% area)	 Inland water bodies (Standing water, Running water) 	
	(1%)	
	 Bogs, Marshes, Water fringed vegetation, Fens 	
	(0.5%)	
	 Heath, Scrub, Maquis and Garrigue, Phygrana (5%) 	
	 Dry grassland, Steppes (45%) 	
	 Improved grassland (3.5%) 	
	 Broad-leaved deciduous woodland (45%) 	
Current condition and threats	1. Public access/disturbance affecting H4010, H4030	
	and S1083	
	2. Habitat fragmentation affecting S1083	
	3. Invasive species affecting H4010, H4030 and S1083	
	4. Air pollution (impact of atmospheric nitrogen	
	deposition) affecting H4010 and H4030	
Supplementary evidence	Site Improvement Plan – Wimbledon Common	
	Conservation Objectives for Wimbledon Common	
	JNCC Wimbledon Common – SAC	

Table 2-4 Windsor Forest & Great Park summary

Site name	Windsor Forest & Great Park	
Site designation	SAC site	
EU code	UK0012586	
Area (ha)	1,680	
 Qualifying species and/or habitat features S1079 Violet click beetle Limoniscus viola H9190 Old acidophilous oak woods wire robur on sandy plains H9120 Atlantic acidophilous beech forest and sometimes also Taxus in the (Quercion robori-petraeae or Ilici-Fagenia) 		
General site character (% area)	 Inland water bodies (Standing water, Running water) (0.5%) Dry grassland, Steppes (4.5%) Mixed woodland (95%) 	
Current condition and threats	 Forestry and woodland management affecting H9120, H9190 and S1079 Invasive species affecting H9190 and S1079 Disease affecting H9190 Air pollution (impact of atmospheric nitrogen deposition) affecting H9120 and H9190 	

Supplementary evidence	Site Improvement Plan – Windsor Forest & Great Park
	Conservation Objectives for Windsor Forest & Great Park
	JNCC Windsor Forest & Great Park – SAC

Table 2-5 South West London Waterbodies summary

Site name	South West London Waterbodies			
Site designation	Ramsar site			
EU code	UK9012171			
Area (ha)	828			
Qualifying species and/or habitat features	A051 Gadwall, Anas strepera			
	A056 Shoveler, Anas clypeata			
	Great cormorant, Phalacrocorax carbo			
	Great crested grebe, Podiceps cristatus			
	Common pochard, Aythya farina			
	 Tufted duck, Aythya fuligula 			
	Eurasian coot, Fulica atra			
General site character (% area)	Reservoirs/barrages/dams (45%)			
	 Gravel/brick/clay pits (25%) 			
	• Other (30%)			
Current condition and threats	1. Public access/disturbance affecting A051 and A056			
	2. Changes in species distributions affecting A051 and			
	A056			
	3. Invasive species affecting A051 and A056			
Supplementary evidence	Site Improvement Plan – South West London Waterbodies			
	Conservation Objectives for South West London			
	<u>Waterbodies</u>			
	<u>Information Sheet on Ramsar Wetlands – South West</u>			
	<u>London Waterbodies</u>			

Table 2-6 Thames Estuary & Marshes

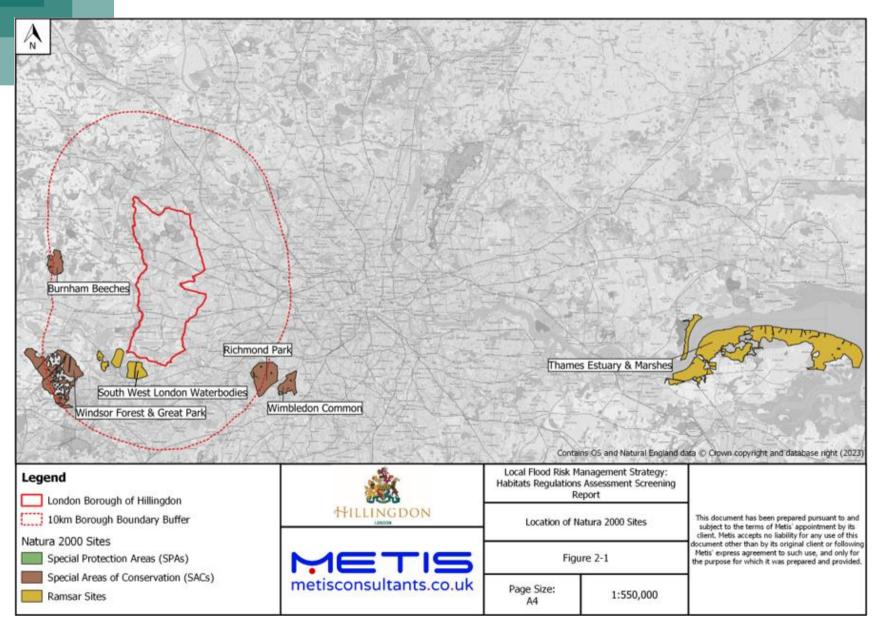
Site name	Thames Estuary & Marshes		
Site designation	Ramsar site		
EU code	UK9012021A		
Area (ha)	5,589		
Qualifying species and/or habitat features	A046: Dark-bellied Brent Goose, Branta bernicla		
	A048: Common shelduck, <i>Tadorna</i>		
	A054: Pintail, Anas acuta		
	A056: Shoveler, Spatula clypeata		
	A081: Marsh harrier, Circus aeruginosus		
	A082: Hen harrier, Circus cyaneus		
	A132: Avocet, Recurvirostra		
	A137: Ringed plover, Charadrius hiaticula		
	A140: Golden plover, Pluvialis apricaria		
	A141: Grey plover, Pluvialis squatarola		
	A143: Red knot, Calidris canutus		

	 A149: Dunlin, Calidris alpina alpina 		
	A156: Black-tailed godwit, Limosa limosa islandica		
	A157: Bar-tailed godwit, <i>Limosa lapponica</i>		
	A162: Common redshank, Tringa tetanus		
	A176: Mediterranean gull, Ichthyaetus		
	melanocephalus		
	A195: Little tern, Sternula albifrons		
General site character (% area)	Sand/shingle shores (including dune systems) (0.8%)		
	Tidal flats (49.6%)		
	Salt marshes (1.3%)		
	 Freshwater lakes: permanent (0.7%) 		
	 Saline/brackish lakes: permanent (4.2%) 		
	 Saline/brackish marshes: seasonal/intermittent 		
	(3.2%)		
	Seasonally flooded agricultural land (38.6%)		
	Other (1.6%)		
Current condition and threats	1. Coastal squeeze affecting all species		
	2. Public access/disturbance affecting all species		
	3. Invasive species affecting all species		
	4. Changes in species distribution affecting all species		
	5. Fisheries: Commercial marine and estuarine		
	affecting all species		
	6. Vehicles: Illicit affecting all species		
	7. Air pollution (risk of atmospheric nitrogen		
	deposition) affecting A082 and A195		
Supplementary evidence	Site Improvement Plan – Greater Thames Complex		
	Conservation Objectives for Thames Estuary & Marshes		
	Information Sheet on Ramsar Wetlands – Thames Estuary		
	<u>& Marshes</u>		

2.4 Consultation questions about the identified sites

- 1. Do you feel that we have included all the designated sites that may be significantly affected by the implementation of the LFRMS? If not, please state any additional sites that you believe should be included.
- **2.** Do you feel that we have included all the relevant information for each of the identified designated sites?

Figure 2-1 Map illustrating locations of selected Natura 2000 sites



3 Screening analysis

3.1 Screening analysis summary

Within the first stage of the HRA (Screening Assessment), the second task is to assess each of the proposed LFRMS Strategic Objectives against each of the identified designated sites. The purpose of this is to ascertain whether there will be any adverse effects on the designated sites by implementing the LFRMS Strategic Objectives and associated actions. Should any negative impacts be identified, this HRA Screening Report will progress to the second stage and a full HRA will be required.

3.2 Screening analysis

Based on the information presented in *Section 2.3*, each LFRMS Strategic Objective has been screened against the identified designated sites to determine whether there will be a potential negative impact on the sites, a potential significant negative impact on the sites or no effect on the sites. An adverse impact could be classified as a disturbance to the natural processes that support the sites' features, a decline in the quantity or quality of habitats or species, or a limitation to the potential of restoring the habitats or species in the future. The results of the analysis between the LFRMS Strategic Objectives and the identified designated sites is presented in *Table 3-1* and the criteria used to assess the proposed LFRMS Strategic Objectives against the designated sites is detailed in *Table 3-2*. The results of the screening analysis evidence that none of the LFRMS Strategic Objectives pose any negative impacts to the six identified designated sites.

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

		HRA Site Name					
		Burnham Beeches	Richmond Park	Wimbledon Common	Windsor Forest & Great Park	South West London Waterbodies	Thames Estuary & Marshes
LFRMS	Α	0	0	0	0	0	0
	В	0	0	0	0	0	0
Strategic	egic C 0 0 0	0	0	0			
Objective	D	0	0	0	0	0	0
	E	0	0	0	0	0	0

Table 3-2 Screening analysis criteria

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

3.3 Screening analysis outcomes

3.3.1 LFRMS Strategic Objective A

Improve knowledge of flood risks in the London Borough of Hillingdon.

Strategic Objective A is unlikely to pose any adverse effects on any of the six identified designated sites. This Strategic Objective is centred on improving the knowledge of flood risks across Hillingdon. Improvements in the local communities' awareness can encourage greater environmental stewardship and can offer additional opportunities for environmental conservation work. Strategic Objective A also does not involve the physical implementation of anything that would harm the identified sites. Therefore, no further investigation into the potential negative effects of Strategic Objective A on the designated sites is required.

3.3.2 LFRMS Strategic Objective B

Improve the collaboration of Risk Management Authorities, and understanding of roles and responsibilities, to manage flood risk effectively

Strategic Objective B is unlikely to pose any adverse effects on any of the six identified designated sites. This Strategic Objective is centred on improving the understanding of the roles and responsibilities of RMAs to effectively manage flood risk across Hillingdon. Partnership working among NE, the LLFA and other RMAs can encourage greater collaboration and can offer additional opportunities to actively protect the designated sites. For example, incorporating blue-green infrastructure can bring about benefits to water quality and habitats. Strategic Objective B also does not involve the physical implementation of anything that would harm the identified sites. Therefore, no further investigation into the potential negative effects of Strategic Objective B on the designated sites is required.

3.3.3 LFRMS Strategic Objective C

Identify and implement opportunities for flood risk management.

Strategic Objective C is unlikely to pose any adverse effects on any of the six identified designated sites. This Strategic Objective is centred on the identification and implementation of opportunities for flood risk management. Measures such as sustainable drainage systems and natural flood management can offer protection against flooding, mitigate the effects of climate change and can enhance the ecological status of the identified designated sites. The implementation of these measures will be reviewed regularly to ensure that proposed features do not cause adverse effects on any downstream habitats. Strategic Objective C also does not involve the physical implementation of anything that would harm the identified sites. Therefore, no further investigation into the potential negative effects of Strategic Objective C on the designated sites is required.

3.3.4 LFRMS Strategic Objective D

Ensure that development within the London Borough of Hillingdon accounts for and mitigates flood risk.

Strategic Objective D is unlikely to pose any adverse effects on any of the six identified designated sites. This Strategic Objective is centred on ensuring proposed development within Hillingdon accounts for and mitigates flood risk. By ensuring that applicants adhere to relevant planning

policies, it can be confirmed that infrastructure meets policy requirements on biodiversity and habitat protection. This is further supported by the implementation of the SuDS Approval Body, which is detailed in the LFRMS. Therefore, future development will be sustainable, can encourage better environmental outcomes and can offer the opportunity to ensure that flood risk mitigation measures also provide protection to designated sites. Strategic Objective D also does not involve the physical implementation of anything that would harm the identified sites. Therefore, no further investigation into the potential negative effects of Strategic Objective D on the designated sites is required.

3.3.5 LFRMS Strategic Objective E

Engage with communities to develop the awareness of flood risk in local areas and improve their resilience.

Strategic Objective E is unlikely to pose any adverse effects on any of the six identified designated sites. This Strategic Objective is centred on the importance of engaging with local community groups to develop their awareness of flood risk and to subsequently improve their resilience. Through active engagement, residents can feel empowered to take action to reduce their own flood risk and improve their resilience. It is important that community groups understand the importance of green spaces, which can reduce surface water runoff while enhancing biodiversity and therefore can benefit conservation efforts within the designated sites. Strategic Objective E also does not involve the physical implementation of anything that would harm the identified sites. Therefore, no further investigation into the potential negative effects of Strategic Objective E on the designated sites is required.

3.4 Consultation questions for the screening analysis

- **3.** Do you have any comments on the method of assessment of the HRA sites against the LFRMS Strategic Objectives?
- **4.** Do you agree with the screening analysis for each of the LFRMS Objectives? If not, please explain why you would screen a certain LFRMS Objective differently.

4 CONCLUSIONS AND NEXT STEPS

4.1 Conclusions

This HRA Screening Report concludes that the implementation of the LFRMS Strategic Objectives will not pose any negative impacts on the six Natura 2000 sites that were identified as part of the screening assessment. By contrast, the delivery of the LFRMS Strategic Objectives aim to enhance and protect natural environments within and surrounding Hillingdon. Based on the outcome of this Screening Report, it can be concluded that the delivery of the LFRMS Strategic Objectives does not require progression onto the HRA Appropriate Assessment (second) stage and that it is thus not necessary for a full HRA to be undertaken.

4.2 Consultation of the HRA

As part of this HRA Screening Report, a statutory consultation will be carried out over a six-week period between December 2023 to January 2024. This will enable NE (as statutory consultee) to review and provide feedback on the scope of the HRA Screening Report. During a six-week period from January to February 2024, a wider public consultation will be undertaken where internal stakeholders, strategic stakeholders and members of the public will be consulted on their views on the document. Following statutory consultation and public consultation, feedback will be appropriately incorporated into the final version of the HRA Screening Report, which is due to be finalised in April 2024.

- **5.** Do you have any comments on the conclusions within this HRA Screening Report of the LFRMS?
- **6.** Do you have any additional comments or suggestions for this HRA Screening Report?