

HABITATS REGULATIONS ASSESSMENT SCREENING REPORT



PREPARED FOR THE LONDON BOROUGH OF HOUNSLOW

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EXECUTIVE SUMMARY

The purpose of this Habitats Regulations Assessment (HRA) is to evaluate the risks posed by the implementation of the Local Flood Risk Management Strategy (LFRMS) and its Action Plan to habitats and protected areas. Under the Conservation of Habitats and Species (Amendment) Regulations (2019), an HRA must be carried out to test if a plan or proposal will cause any significant harm to designated European sites. European sites, also referred to as Natura 2000 sites, are areas protected under the Habitats and Birds Directives and include Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites.

There are three stages to an HRA, as follows: 1. Screening, 2. Appropriate Assessment and 3. Derogation. This Screening Report is the output from Task 1 which focuses on the gathering of evidence and determining whether the proposal is likely to have a significant effect on the site's conservation objectives.

There is only one site within Hounslow that is designated as a Natura 2000 site. This is Kempton Park East Reservoirs which is a part of the 'South West London Waterbodies' SPA. Sites which lie outside Hounslow's administrative boundary may also be affected by the LFRMS due to the nature of hydrological flows. Therefore, European sites that are located either wholly or partially within a 10 km radius of the borough boundary were also assessed. Three further designated sites were identified through this process Richmond Park, Wimbledon Common and Windsor Forest and Great Park.

The Screening Analysis of the LFRMS strategic objectives against each site, determined that the implementation of the LFRMS and its associated action will not likely cause any significant harm to any of the four designated sites. The strategic objectives both directly and indirectly aim to enhance and protect natural and water environments and all four are likely to have benefits for the conservation objectives of each of these sites.

In conclusion, all four LFRMS strategic objectives have been screened out at this stage of the HRA process and therefore the Hounslow LFRMS does not require progression onto the Appropriate Assessment stage and does not require a full HRA.

No feedback was received from Natural England. The feedback from Environment Agency (EA) and the public will be incorporated into the final post-public consultation version of the report. Public consultation will commence on the 9th May 2022.

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ACRONYMS AND ABBREVIATIONS

Abbreviation	Definition
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
HE	Historic England
Hounslow	London Borough of Hounslow
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
SAC	Special Area of Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
TWUL	Thames Water Utilities Limited

1 INTRODUCTION

1.1 Purpose of Screening

The purpose of this Habitats Regulations Screening Assessment (HRA) is to evaluate the risks posed by actions in the Local Flood Risk Management Strategy (LFRMS) to habitats and protected areas. The aim of the screening stage of a HRA is to gather evidence of any significant or likely negative effect which may then require progression onto the appropriate assessment phase.

A HRA is required under the [Conservation of Habitats and Species \(Amendment\) Regulations \(2019\)](#) known also as the Habitats Regulations. The assessment must be carried out to test if a plan or proposal will cause any significant harm to designated European sites. A LFRMS is considered a plan and so requires an HRA. European sites, also referred to as Natura 2000 sites, are areas protected under the Birds and Habitats Directives and include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). In addition to this any proposed SACs, SPAs, both active and proposed Ramsar Sites (wetlands of international importance), and any areas secured as sites compensating for damage to a European site also require consideration in an HRA.

1.2 Methodology

A full HRA assessment involves a 3-stage process. Task 1 involves the identification of any potential significant effects; Task 2 assesses ways to mitigate any significant effects identified and Task 3 considers any exemptions. These stages are defined by guidance produced by the Department for Environment, Food and Rural Affairs (DEFRA), Natural England, and additional Welsh governing bodies.

This document will cover Task 1 and produce the HRA Screening report to determine whether the proposed strategy objectives of the LFRMS for the London Borough of Hounslow (Hounslow) will have any significant adverse effect on designated areas. The HRA is only required to progress onto Task 2 and 3, if any significant effects are identified in Task 1. This report, alongside the Strategic Environmental Assessment (SEA) will go through a consultation period where the evidence will be reviewed by Natural England (statutory consultee). This process is a continuous procedure, and the outputs will be reviewed accordingly.

Table 1-1 Summary table of HRA stages and their purpose

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

*Under the Habitats Regulations, derogation recognises plans and projects which have sufficient importance to justify the possibility (or certainty) of damage to a European site.

1.3 HRA Consultation Questions

A requirement of the HRA screening is to consult statutory consultees and allow any other stakeholders or parties to review the outcomes. To fulfil this a set of questions have been assembled, which align with each chapter and steps taken in this Screening Report. Statutory consultation bodies will be asked to respond to these consultation questions prior to the public consultation phase of this document. A full list of the consultation questions has been included below for completeness.

Identifying relevant sites

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

Screening analysis

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

Conclusions and further comments

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

1.4 Local Flood Risk Management Strategy

1.4.1 LFRMS Summary

Under the [FWMA \(2010\)](#), Hounslow has the role of Lead Local Flood Authority (LLFA) and is responsible for managing local flood risk within the borough. As LLFA, Hounslow are required to produce and maintain a Local Flood Risk Management Strategy (LFRMS) which is updated every six years. The purpose of the LFRMS is to outline how the LLFA and other stakeholders will manage flood risk in the borough, including flooding from sources such as surface water, groundwater and ordinary watercourses. The LFRMS sets out the Hounslow strategic objectives for managing flood risk from all sources, and the actions that will be taken to achieve them are outlined in an accompanying Action Plan.

1.4.2 Local Area Information

Hounslow is located in west London and covers an area of 56 km². It shares its borders with the London Boroughs of Ealing to the north, Hillingdon in the north-west, Richmond upon Thames to the south and Hammersmith and Fulham to the east, with Surrey County Council to the west. The main rivers in Hounslow are the River Thames, River Crane, River Brent, Duke of Northumberland's River, Lower Feltham Brook and Felthamhill Brook.

1.4.3 Strategy Objectives

A list of the strategic objectives of the LFRMS are listed below. These objectives have been developed in line with the [National Flood and Coastal Erosion Risk Management Strategy \(NFCERMS\)](#).

- A.** Establish and maintain collaborative partnerships with key stakeholders, such as utility companies, local government, and other risk management authorities to maximise joint-working opportunities.
- B.** Pro-actively encourage holistic and sustainable, nature-based solutions that deliver wider environmental, social, and economic benefits.
- C.** Engage, educate and empower local communities to take action and contribute to the management and reduction of flood risk, including through the uptake of flood resilience.
- D.** Seek to identify funding and resources available for flood risk management, targeting resources where they could have the greatest effects.

1.5 Consultation Process

This HRA Screening report is required to go through a consultation process which will involve key stakeholders such as the Environment Agency (EA) and Natural England (statutory consultees). The 6 HRA Consultation Questions presented in *Section 1.3* will be repeated under their relevant chapters throughout this Screening Report. A public consultation will occur in May 2022 of all the LFRMS documents, and any feedback will be incorporated into the final versions of these documents accordingly.

2 IDENTIFICATION OF RELEVANT SITES

2.1 Introduction to the Sites

The first step in the HRA Screening process is to identify any European sites (Natura 2000 sites) within the borough. There is only one site within the boundary designated as a Natura 2000 site and this is Kempton Park East Reservoirs which is a part of the 'South West London Waterbodies' SPA. Sites which lie outside of the borough's administrative boundary may also be affected by the LFRMS due to the nature of hydrological flows, so it is important that these are also assessed. *Section 2.2* will examine sites within Hounslow, including sites which extend over the borough boundary and *Section Error! Reference source not found.* will examine sites with a relative proximity to Hounslow. The information gathered in *Sections 2.2 and 2.3* were identified using a combination of information and mapping facilities available from [Natural England](#), the [Joint Nature Conservation Committee \(JNCC\)](#) and DEFRA's [Magic Map](#) facility.

2.2 Sites within the Hounslow borough boundary

2.2.1 South West London Waterbodies (Site 1)

The South West London Waterbodies comprises of a series of embanked water supply reservoirs and former gravel pits that support a range of man-made and semi-natural open water habitats. This SPA site is located across administrative boundaries including Hounslow and the London Borough of Richmond upon Thames as well as Berkshire and Surrey County Councils.

The part of this SPA/Ramsar that is located within Hounslow is the Kempton Park East Reservoirs, (also known as Kempton Nature Reserve) which lies in the southwest corner of the borough. The Red House Reservoir lies just south of the Kempton Park site in Surrey. Other parts of the SPA/Ramsar site such as the Staines and Wraysbury Reservoirs are also located in Surrey but on the west side of Hounslow. For the sake of this assessment the entire SPA site will be treated as one site.

Table 2-1 South West London waterbodies (Site 1) summary

Site name	South West London Waterbodies
Site designation	SPA and Ramsar
EU code	UK9012171
Area (ha)	828.14
Qualifying species and/or habitat features	<p>SPA</p> <ul style="list-style-type: none"> • Gadwall, <i>Anas strepera</i> - A051, nb • Shoveler, <i>Anas clypeata</i> - A056, nb <p>Ramsar</p> <ul style="list-style-type: none"> • Gadwall, <i>Anas strepera</i> - Wintering • Shoveler, <i>Anas clypeata</i> - Wintering
General site character (% area)	<ul style="list-style-type: none"> • Inland water bodies (Standing water, running water): 70% • Improved grassland: 20%

	<ul style="list-style-type: none"> • Broad-leaved deciduous woodland: 5% • Humid grassland: 5%
Current condition and threats	<ul style="list-style-type: none"> • Public access/ disturbance • Changes in species distributions • Invasive species • Natural changes to site conditions • Fish stocking • Inappropriate weed control
Supplementary evidence	Standard Data Form – UK9012171 European Site Conservation Objectives for Southwest London Waterbodies SPA - UK9012171

2.3 Sites outside the Hounslow borough boundary

This section considers European Natura 2000 sites which lay outside the borough but are within a 10km radius of the borough boundary. European sites were included if they occurred either wholly or partially within this geographical area. Although this criterion is not required by legislation, it has been used in previous Hounslow HRA's and in those from other London boroughs. It is therefore considered an appropriated criteria for identifying any likely significant effects. The parts of the 'South West London waterbodies' site which are located outside the borough boundary are not considered here as they have already been considered in *Section 2.2*.

Three further designated sites were identified through this process Richmond Park, Wimbledon Common and Windsor Forest and Great Park.

2.3.1 Richmond Park (Site 2)

Table 2-2 Richmond Park (Site 2) summary

Site name	Richmond Park
Site designation	SAC
EU code	UK0030246
Area (Ha)	846.27
Qualifying species and/or habitat features	<ul style="list-style-type: none"> • S1083 Stag beetle, <i>Lucanus cervus</i>
General site character	<ul style="list-style-type: none"> • Inland water bodies (Standing water, Running water) (1.5%) • Bogs, Marshes, Water fringed vegetation, Fens (0.5%) • Heath, Scrub, Maquis and Garrigue, Phygrana (25%) • Dry grassland, Steppes (18%) • Humid grassland, Mesophile grassland (5%) • Improved grassland (20%) • Broad-leaved deciduous woodland (25%) • Mixed woodland (5%)
Current condition and threats	No current issues affecting the Natura 2000 feature(s) have been identified on this site.
Supplementary evidence	Richmond Park Special Area of Conservation (SAC) Site Improvement Plan: Richmond Park - SIP184 (naturalengland.org.uk)

2.3.2 Wimbledon Common (Site 3)

Table 2-3 Wimbledon Common (Site 3) summary

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

2.3.3 Windsor Forest and Great Park (Site 4)

Table 2-4 Windsor Forest and Great Park (Site 4) summary

Site name	Windsor Forest and Great Park
Site designation	SAC
Eu code	UK0012586
Area (ha)	1685.92
Qualifying species and/or habitat features	<ul style="list-style-type: none"> • H9120 Atlantic acidophilous beech forests with <i>Ilex</i> • H9190 Old acidophilous oak woods with <i>Q. robur</i> on snady plains • S1079 Violet click beetle, <i>Limoniscus violaceus</i>
General site character	<ul style="list-style-type: none"> • Inland water bodies (Standing water, Running water) (0.5%) • Dry grassland, Steppes (4.5%) • Mixed woodland (95%)
Current pressure and/or threats	<ul style="list-style-type: none"> • Forestry and woodland management, affecting H9120, H9190 and S1079 • Invasive species, affecting H9190 and S1079 • Disease, H9190 • Air pollution (impact of atmospheric nitrogen deposition), affecting H9120 and H9190
Supplementary evidence	Windsor Forest and Great Park Special Area of Conservation (SAC)

[European Site Conservation Objectives for Windsor Forest & Great Park
SAC - UK0012586
Site Improvement Plan – Windsor Forest and Great Park](#)

2.4 Classified Sites Consultation Questions

Questions to be asked during the consultation exercise based upon the screening analysis conducted:

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

3 SCREENING ANALYSIS OF THE LOCAL FLOOD RISK MANAGEMENT STRATEGY

3.1 Screening Analysis Summary

This stage of the HRA will assess the proposed strategic objectives of the LFRMS against each of the identified sites to determine if there will be no negative effect, a potential negative effect, or a potentially significant negative effect on these Natura 2000 sites.

3.2 Screening Analysis

The first task in analysing the LFRMS strategic objectives is to distinguish whether there will be any potential effect to any of the Natura 2000 sites identified in *Section 2.2* and *2.3*. Following this, evidence should be supplied to support these decisions and a conclusion on whether the objective can be screened out of the HRA process can be agreed. **Error! Reference source not found.** shows the potential effect that each strategic objective may have on each of the sites reviewed in this Screening Report. As visible, none of the LFRMS objectives pose any effect to the sensitive European sites distinguished in this analysis.

Table 3-1 Scoring matrix of LFRMS strategy objectives against HRA outcome criteria

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

Table 3-2 Legend criteria for Table 3-1

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

3.3 Screening Analysis Outcome

3.3.1 LFRMS Strategic Objective A

It is not likely that there will be any significant effects on any European sites from this strategic objective. This objective focuses on establishing and maintaining partnerships with key organisations. Encouraging collaborative working when delivering flood risk schemes has the potential to improve communication between different Risk Management Authorities (RMAs). In the case of environmental and ecological concerns, well maintained relationships with Natural

England and the EA, among others, can help to identify any additional benefits that could be achieved in the delivery of flood risk schemes. Also, maintaining relationships with neighbouring boroughs such as Surrey County Council, where parts of Site 1 are located and the London Borough of Richmond upon Thames, where Site 2 is located, can help ensure that flood risk schemes do not impact these designated sites. This strategic objective has therefore been screened out at this stage of the HRA.

3.3.2 LFRMS Strategic Objective B

This strategic objective is not likely to have any impact on these designated sites. This objective is focused on promoting holistic and sustainable nature-based solutions that deliver wider environmental, social, and economic benefits. Making consideration for the wider environmental benefits through flood risk management activities can help protect and enhance biodiversity. This strategic objective has therefore been screened out at this stage of the HRA.

3.3.3 LFRMS Strategic Objective C

This strategic objective is not likely to have any impact on these designated sites. It is focused on engaging the local communities to increase their own flood resilience. Educating local communities on flooding and on the important role of natural green spaces can benefit conservation efforts within the designated sites mentioned in *Section 2.2* and *2.3*. This strategic objective has therefore been screened out at this stage of the HRA.

3.3.4 LFRMS Strategic Objective D

This objective is unlikely to have an effect on any of the Natura 2000 sites. This objective is aimed at identifying funding for flood risk management and targeting resources to areas at highest risk. When identifying funding sources for the borough, there are likely to be additional requirements that must be met when delivering projects. These could potentially include actions to improve or maintain biodiversity and ecological health when developing flood risk schemes. Having additional conditions applied to funding applications is a method which the UK Government and other organisations are using to help LFFAs and themselves meet biodiversity and environmental targets. This strategic objective has therefore been screened out at this stage of the HRA.

3.4 Screening Analysis Consultation Questions

Questions to be asked during the consultation exercise based upon the screening analysis conducted:

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

4 CONCLUSIONS AND NEXT STEPS

4.1 Conclusions

This HRA screening analysis concludes that none of the proposed strategic objectives of the LFRMS will impose negative effects on the Natura 2000 sites identified in this report. The strategic objectives both directly and indirectly aim to enhance and protect natural and water environments and some of them could help to benefit these sensitive environments. It has therefore been determined that the HRA for the Hounslow LFRMS does not require progression onto the appropriate assessment stage and does not require a full HRA.

4.2 Consultation of the HRA

A consultation period with the statutory consultation bodies on the scope of the HRA and its analysis of the sensitive sites identified took place in March 2022. The statutory consultees listed in *Section 1.5* reviewed this HRA screening report and answered the consultation questions outlined in each section. No feedback was received from Natural England. Feedback from the EA and the public will be incorporated into the final post public consultation version of this HRA screening report and any other relating LFRMS documents.

Questions to be asked during the consultation exercises based upon conclusions and this HRA Screening Report as a whole:

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

APPENDIX 1 MAP OF RELEVANT NATURA 2000 SITES

