Westminster City Council

LOCAL FLOOD RISK MANAGEMENT STRATEGY

Information to Inform a Habitats Regulations Assessment



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1 INTRODUCTION

1.1 BACKGROUND

1.1.1. Westminster City Council (WCC) as the Lead Local Flood Authority (LLFA) has a range of risk management duties to manage local flood risk in the borough in accordance with the Flood and Water Management Act (2010). Local flooding is defined as flooding from surface water, ordinary watercourses and groundwater; the flooding from these sources is typically more localised than flooding from rivers and the sea and management of local flooding in Westminster relies on coordination of the combined sewer network.

1.1.2. As LLFA, WCC must produce a Local Flood Risk Management Strategy (LFRMS) to set out a strategy for managing local flood risk. This must be developed in accordance with the Environment Agency's National Strategy for Flooding and Coastal Erosion Risk Management[1]. The LFRMS (herein referred to as the 'Proposed Strategy') provides an action plan for 2024 – 2030 with clear objectives and measures, setting out how local flood risk will be managed by WCC and other associated authorities. It also considers the impact of climate change on flooding in the future and attempts to minimise these risks.

1.1.3. The aims of the Proposed Strategy are:

- To meet the statutory duties of an LLFA under the Flood and Water Management Act;
- To provide an understanding of local flood risk within Westminster, using knowledge from all Risk Management Authorities (RMAs);
- To ensure RMAs have a mechanism to work together effectively to understand and deliver appropriate flood risk management; and,
- To set objectives, measures and actions to sustainably manage flood risk in Westminster, addressing other societal or environmental objectives where possible.

1.1.4. WSP was commissioned to undertake a Habitats Regulations Assessment (HRA) of the Proposed Strategy to determine whether any of its constituent policies would affect sites designated and protected by the Conservation of Habitats and Species Regulations 2017 (as amended; the 'Habitats Regulations'). This is concurrent with WCC's responsibilities under the Habitats Regulations. The Proposed Strategy can be found in full in Appendix A.

1.2 PURPOSE OF THIS REPORT

1.2.1. This report presents information to support a Habitats Regulations Assessment (HRA) screening. It is submitted with the planning application to provide the competent authority with the information it needs to inform an assessment of Likely Significant Effects (LSEs) associated with the Proposed Strategy on Habitats Sites. The competent authority may consent the Proposed Strategy only after having ascertained that it will not lead to LSEs, and that it will not adversely affect the integrity of the Habitats Sites.

[1] Environment Agency (2020) National Flood and Coastal Erosion Risk Management Strategy. Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/920944/023_15482_Environment_agency_digitalAW_Strategy.pdf [Accessed 18 April 2023]

2 DESCRIPTION OF THE LOCAL FLOOD RISK MANAGEMENT STRATEGY AND ITS POLICIES

2.1 OVERVIEW

2.1.1. WCC is a unitary authority located on the north side of the River Thames in central London, covering 21.5km^2. It is home to a long standing and diverse residential community of 204,200[2] (2021), as well as the Houses of Parliament and virtually all government and related departments, No. 10 Downing Street and New Scotland Yard. Buckingham Palace and the Royal Courts of Justice are located within 2km of the River Thames. Westminster contains important national and local infrastructure. It has four of London's main line railway termini and 10 out of the 12 London underground lines.

2.1.2. As well as the River Thames, the city contains other water features, including Regent's Canal, the Grand Union Canal, Paddington Basin and Little Venice, totalling 6.4 km of canal frontage. There are also five 'hidden rivers'; the Westbourne, Tyburn, Tyburn Brooke, Kilbourne and Long Ditch. The Serpentine (in Hyde Park) and the lakes in Buckingham Palace Gardens and St James's Park are the places where the Westbourne surfaces in Westminster, although they are now disconnected from the original watercourse. Westminster sits above a regional chalk aquifer covered with gravels and clay. However, as would be expected in a dense highly urban environment much of the physical landscape is constructed of hard, non-porous materials.

2.1.3. Westminster is bounded by the London Borough of Brent to the north, the City of London and the London Borough of Camden to the east, the tidal Thames to the South and the Royal Borough of Kensington and Chelsea to the west (Map 1).



Map 1 - Westminster location map

[2] As recorded by the 2021 Census

2.1.4. WCC previously produced a LFRMS for 2017 – 2022[3]. The objectives, measures and actions that could have the biggest impact to flood risk in Westminster were prioritised. Actions which are still considered relevant to ongoing flood management have been incorporated into the updated Proposed Strategy. In particular, the Proposed Strategy includes lessons learned from flood events that affected Westminster in July 2021.

2.2 OBJECTIVES AND MEASURES

2.2.1. Following the public engagement survey and stakeholder engagement workshops, objectives, measures and actions were defined for the Proposed Strategy, reflecting the progress made to date and the further action needed to better manage flood risk in Westminster. Objectives are defined as the overarching vision, aligned with the National Flood and Coastal Erosion Management (FCERM) Strategy produced for England by DEFRA. Measures are the next step to achieving these objectives, linked to local needs within Westminster. Finally, the measures are broken down into actions, providing specific (and often time-bound) targets.

2.2.2. The objectives are presented below alongside proposed measures to achieve them, and specific actions to be undertaken are presented in Table 2-1 below. WCC will work towards delivering each of the objectives with key partners over the next 6 years.

[3] Westminster City Council (2017) Local Flood Risk Management Strategy 2017 – 2022. Available from: https://www.westminster.gov.uk/media/document/en-env-011---local-flood-risk-management-strategy-2017-2022 [Accessed 18 April 2023]

Table 2-1 – LFRMS objectives, measures and actions

Objective	Measure	Action
Objective 1: To better understand and explain the level of local flood risk affecting Westminster with partners, businesses and communities.	1.1 Create an integrated record of historic flooding and sources of flood risk in Westminster through data collection.	1.1.1 Develop and maintain a central GIS database of flood risk from all sources and historic flooding, and flood management assets in Westminster.
		1.1.2 Collect tangible data on areas at risk, historic events, and flood management assets by engaging with internal departments, risk management authorities, landowners and asset owners.
		1.1.3 Collect tangible data on historic flood events from community groups through direct engagement.
		1.1.4 Actively engage with community groups after major storms to record relevant impacts.
		1.1.5 Develop an online mapping platform for flood sources, assets and upcoming FRM projects.
	1.2 Quantify, visualise and communicate risk to understand the exposure to risk and the cost that this may incur to businesses, residents and communities.	1.2.1 Develop written and / or digital materials which help visualise risk and quantify potential costs, both financial and to wellbeing.
		1.2.2 Promote materials produced to quantify risk to communities and partners through and engagement plan.
	1.3 Engage with local forums, resident's associations, communities, businesses and social enterprise to provide further information in relation to flood risk management.	1.3.1 Create an educational data hub for flood risk safety, featuring videos and infographics.
		1.3.2 Update the website to signpost communities and residents to the appropriate resources and actions to take.
		1.3.2 Create a targeted community engagement strategy and circulate internally and externally.

Objective	Measure	Action
		1.3.3 Provide education for short term residents / lettings about flood risk in Westminster, through information pamphlets and periodic review.
		1.3.4 Regularly attend local neighbourhood forums, resident associations, business groups in the communities and community group events to discuss flood risk issues. Minimum of three per year.
	1.4 Promote a better understanding of flood risk with partners through information sharing and engage in stronger collaboration efforts.	1.4.1 Improve collaboration between Westminster and Thames Water to share knowledge, including upcoming schemes and strategies through a quarterly check in.
		1.4.2 Collaborate with the London Fire Brigade annually at their community open days to provide information on flood risk, to deliver an integrated information service.
		1.4.3 Collaborate with schools to develop a flood risk program to educate and improve flood risk knowledge in partnership with neighbouring boroughs and organisations.
Objective 2: To develop holistic, integrated, multi-beneficial and sustainable approaches to flood risk management in Westminster.	2.1 Increase opportunities for biodiversity, ecosystem services or urban greening to complement water management in Westminster.	2.1.1 Clearly identify targets and opportunities for biodiversity enhancement in Westminster.
		2.1.2 Produce a 'developer guide' on achieving multiple benefits within a development scheme.
	2.2 Continue to Implement public realm SuDS with target to attenuate 15% of water above the surface for a 1:30yr event (3.33% AEP) from the SuDS Catchments by 2030.	2.2.1 Engage with Westminster internal teams to develop the integration of SuDS into Westminster owned properties.
		2.2.2 Develop standard details for different SuDS elements for easy integration into Westminster's public realm and highways schemes.
		2.2.3 Provide design advice for ongoing public realm and highways schemes.

Objective	Measure	Action
		2.2.4 Develop SuDS masterplan for the SuDS Catchments, to identify potential areas within Westminster which would be suitable for SuDS and provide flood risk and wider benefits.
		2.2.5 Retrofit SuDS within the identified SuDS Catchments.
		2.2.6 Establish requirement for all major planning applications to submit a verification report detailing SuDS installed and storage volumes.
		2.2.7 Develop and maintain a GIS database of all SuDS features and storage volumes across Westminster.
		2.2.8 Develop targeted policy to encourage rainwater harvesting / reuse.
		2.2.9 Develop innovative solutions to remove Surface Water Runoff from the Thames Water Combined Sewer System including assessing the opportunity to establish a separate surface water sewer in Westminster by 2050.
		2.2.10 Develop a standardised maintenance and management plan (including estimated costs and maintenance schedules) for SuDS implemented in Westminster's public realm and highways.
Objective 2: To develop holistic, integrated, multi-beneficial and sustainable approaches to flood risk management in Westminster.	2.3 Connect complimentary internal and London-wide strategies (including the London Surface Water Strategy) to ensure maximised flood risk and wider environmental benefits are realised.	2.3.1 Engage with Westminster internal teams to highlight the wider benefits of SuDS and an integrated approach.
		2.3.2 Review sources of funding with partners on a quarterly basis to identify opportunities for joint benefits.
		2.3.3 Review internal and external strategies on a quarterly basis for opportunities to collaborate with other internal departments in Westminster and other RMAs.
		2.3.4 Work with relevant partners and stakeholders to develop a joint Thames Riverside Strategy by 2030 in line with the Thames Estuary 2100 Plan.

Objective	Measure	Action
Objective 3: To promote and ensure preparedness, resilience and recovery to local flood risk with partners, businesses and communities.	3.1 Implement a system of identifying, contacting and providing support to residents before, during and after flood events by 2026.	3.1.1 Identify residents that are at risk of surface water flooding and provide them with detailed information for support during a flood event.
		3.1.2 Update the WCC website to include a dashboard of all extreme weather events, flood risk and a virtual warning system.
		3.1.3 Utilise social media to issue flood alerts and warnings during flood events.
		3.1.4 Develop text warning system that can be signed up to for severe weather.
		3.1.5 Provide support to most affected communities after a flood event through personal contact and online information.
	3.2 Improve resilience and recovery amongst partners, businesses and communities.	3.2.1 Provide information on WCC website for improving property resilience and preparing for flooding.
		3.2.2 Provide information on WCC website for recovery after a flood event.
		3.2.3 Work with Thames Water to understand how they would prefer flood events to be reported and communicate this to businesses and communities.
		3.2.4 Carry out Section 19 investigations within 4 weeks following a flood event that triggers the S19 threshold.
Objective 4: To ensure all development takes an integrated approach to flood risk management, ensuring it is sustainable and delivers improvements.	4.1 Streamline local planning guidance and clarify necessary documentation for all developments by 2025.	4.1.2 Update the WCC website regularly with the relevant planning guidance and documents. This includes developer checklists, updating and keeping the SFRA under review.
		4.1.3 Keep a database of new incoming planning applications for basement developments to provide an indication of where there is a lot of basement development coming forward.
		4.1.4 Ensure the GLA GIS database of basements is up to date.

Objective	Measure	Action
	4.2 Ensure all new developments consider SuDS, with preference to above ground SuDS by 2025.	4.2.1 Update planning guidance for developers to ensure that flood risk and SuDS are considered in all new developments, with preference for above ground SuDS.
Objective 5: To adopt and implement a collaborative approach to flood risk management in Westminster with partners, businesses, and communities.	5.1 Engage in regional networks for sharing of knowledge and best practice.	5.1.1 Regular attendance (quarterly) at the Central London North Flood Risk Partnership Group and LoDEG.
		5.1.2 Disseminate regional updates internally on a regular basis through LLFA meetings and email.
	5.2 Work with other RMAs and risk management stakeholders to engage communities.	5.2.1 Ensure pertinent information from local neighbourhood forums is disseminated to Westminster stakeholders.
		5.2.2 WCC will Jointly attend at least two public events in local communities per year with other RMAs.
	5.3 Encourage the involvement of communities and businesses in Flood Risk Management.	5.3.1 Identify opportunities for joint funded community resilience projects. Review on a quarterly basis.
		5.3.2 Engage with community groups about upcoming FRM schemes and their areas of concern through attendance of their meetings and specific engagement events.
		5.3.3. Support and promote the establishment of community flood wardens in the most at risk areas.
		5.3.3 Establish an online system for reporting flood incidents in Westminster.

3 HRA PROCESS

3.1 LEGISLATIVE AND PLANNING POLICY CONTEXT

Habitats Regulations Assessment

3.1.1. The Conservation of Habitats and Species Regulations 2017 (as amended, hereafter referred to as the Habitats Regulations) protects a national network of sites within the UK consisting of Special Areas of Conservation ('SAC'; focussed on intrinsically important habitats and biological populations other than birds) and Special Protection Areas ('SPA'; focussed on protecting important bird populations and the habitats that support them). This National Site Network, termed the Natura 2000 network prior to the UK's departure from the European Union, supports and forms part of a wider network of sites within Europe.

3.1.2. As a result of the 2019 Habitats Regulations references to Natura 2000 in the 2017 Regulations, and in guidance, are now taken to refer to the 'National Site Network'.

3.1.3. Maintaining a coherent network of protected sites with overarching conservation objectives is still required to:

- fulfil the commitment made by government to maintain environmental protections; and
- continue to meet our international legal obligations, such as the Bern Convention, the Oslo and Paris (OSPAR) Conventions, Bonn and Ramsar Conventions.

3.1.4. Regulation 63 (1) of the Habitats Regulations states that *'A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—*

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of that site,

—must make an Appropriate Assessment of the implications for that site in view of that site's conservation objective".

3.1.5. Where effects on a habitats site are likely to be significant, they must be subject to the second stage of the HRA process, Appropriate Assessment. Conservation of Habitats and Species Regulations 2017 (as amended) also make allowance for projects or plans to be completed if they satisfy 'imperative reasons of overriding public interest (IROPI)'[4]. Regulations 64 and 68 cover such situations.

3.1.6. Although the UK has now left the European Union, Court of Justice of the European Union (CJEU) decisions issued prior to 1st January 2021 remain binding until subsequent UK court decisions overrule them. Further to the case of *Harris v Environment Agency*, it is clear that article 6(2) of the Habitats Directive still continues to take effect.

[4] '*(a) reasons relating to human health, public safety or beneficial consequences of primary importance to the environment; or .*

(b) any other reasons which the competent authority, having due regard to the opinion of the European Commission, consider to be imperative reasons of overriding public interest.'

National Planning Policy Framework 2021 (NPPF)

3.1.7. The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development (for the purposes of this assessment the Proposed Scheme is considered to be a development) can be produced. It must be considered in preparing the development plan and is a material consideration in planning decisions.

3.1.8. The NPPF (at para 179) states that when considering the conservation and enhancement of the natural environment, with regard to habitats and biodiversity, the Local Planning Authority should:

"…protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity".

3.1.9. Para 181 to 182 of the NPPF states: The following should be given the same protection as habitats sites:

181:

a) "potential Special Protection Areas and possible Special Areas of Conservation;

b) listed or proposed Ramsar sites; and

c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites".

182: *"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site".*

3.2 STAGES OF HABITATS REGULATIONS ASSESSMENT

3.2.1. UK Government guidance[5] sets out the process of HRA. Existing guidance on the assessment of effects of plans or projects on Natura 2000 sites (now Habitats Sites in the UK) issued by the European Commission[6] has also been used by this assessment. This document sets out the step-wise approach which should be followed to enable competent authorities to discharge their duties under the Habitats Regulations. The process used is usually summarised in four distinct stages of assessment which are described below and shown in the chart overleaf.

[5] Defra (2023) Habitats regulations assessments: protecting a European site. Available: https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site; accessed 8 April 2024

[6] European Commission (2018) Managing Natura 2000 Sites: the provisions of Article 6 of the Habitats Directive 92/43/CEE. Brussels: European Commission.

- **Screening (Stage 1):** the process to identify the likely effects of a plan or project upon the qualifying features and conservation objectives of a Habitats Sites, either alone or in combination with other plans or projects and consider whether there will be an LSE.
- **Appropriate Assessment (Stage 2):** detailed consideration of LSEs and whether they would lead to significant adverse effects on the integrity of the Habitats Sites, either alone or in combination with other plans and projects. Where there are adverse effects, mitigation is considered to offset them. Consent may only be granted at this stage if the Appropriate Assessment can conclude beyond reasonable scientific doubt that the plan or project will not have adverse effects (alone or in-combination with other plans or projects). If the mitigation options cannot avoid adverse effects, then development consent can only be given if Stages 3 and 4 are followed.
- **Assessment of Alternative Solutions (Stage 3):** the process which examines alternative ways of achieving the objectives of the plan or project that avoid or have lesser adverse effects on the integrity of the Habitats Sites.
- **Imperative Reasons of Overring Public Interest (IROPI) (Stage 4):** the assessment where no alternative solutions exist and where adverse effects remain: an assessment of whether the development is necessary for IROPI and, if so, of the compensatory measures needed to maintain the overall coherence of the site or integrity of the Habitats Sites.

3.2.2. 3The method for assessing the likely significance of an effect is based on the potential for impacts arising from the Proposed Scheme, both alone and in-combination with other plans and projects, to undermine the Conservation Objectives of relevant Habitats Sites. There is no specific definition of what constitutes a LSE, but case law (CJEU C-127/02[7]) clarified that in the context of an HRA, an LSE is one whose occurrence cannot be excluded based on objective information.

3.3 SCREENING (STAGE 1)

3.3.1. An initial broad screening of Habitats Sites to investigate the potential for effects pathways linking them the Proposed Scheme has been undertaken and is referred to as ‘screening’. The screening process was wide-ranging and took into consideration the sensitivity and mobility of Habitats Site Qualifying Features, e.g. marine mammal and bat species, as well as the nature of the proposed works and working methods.

3.3.2. Its purpose is to identify the likely impacts upon a Habitats Site of a project or a plan, either alone or in combination with other plans or projects and considers whether these impacts are likely to be significant. It will include:

- determining whether the plan is directly connected with or necessary for the management of applicable sites (SAC, SPA, Ramsar);
- describing the project/plan that may have the potential for significant effects upon applicable sites;
- undertaking an initial scoping for potential direct and indirect impacts upon applicable sites;
- assessing the likely significance of any potential effects identified as resulting from these impacts, both alone and in-combination with other plans and projects; and
- excluding sites where it can be objectively concluded that there will be no significant effects.

[7] CJEU - C-370/12 / Judgment Thomas Pringle v Government of Ireland and Others.

3.3.3. Results of the screening assessment are set out in Section 4. It should be noted that due to the early stage of assessment no list of plans or projects that could act in-combination with the Proposed Scheme is available at this time. The assessment in relation to in-combination effects will be undertaken in later versions of this assessment.

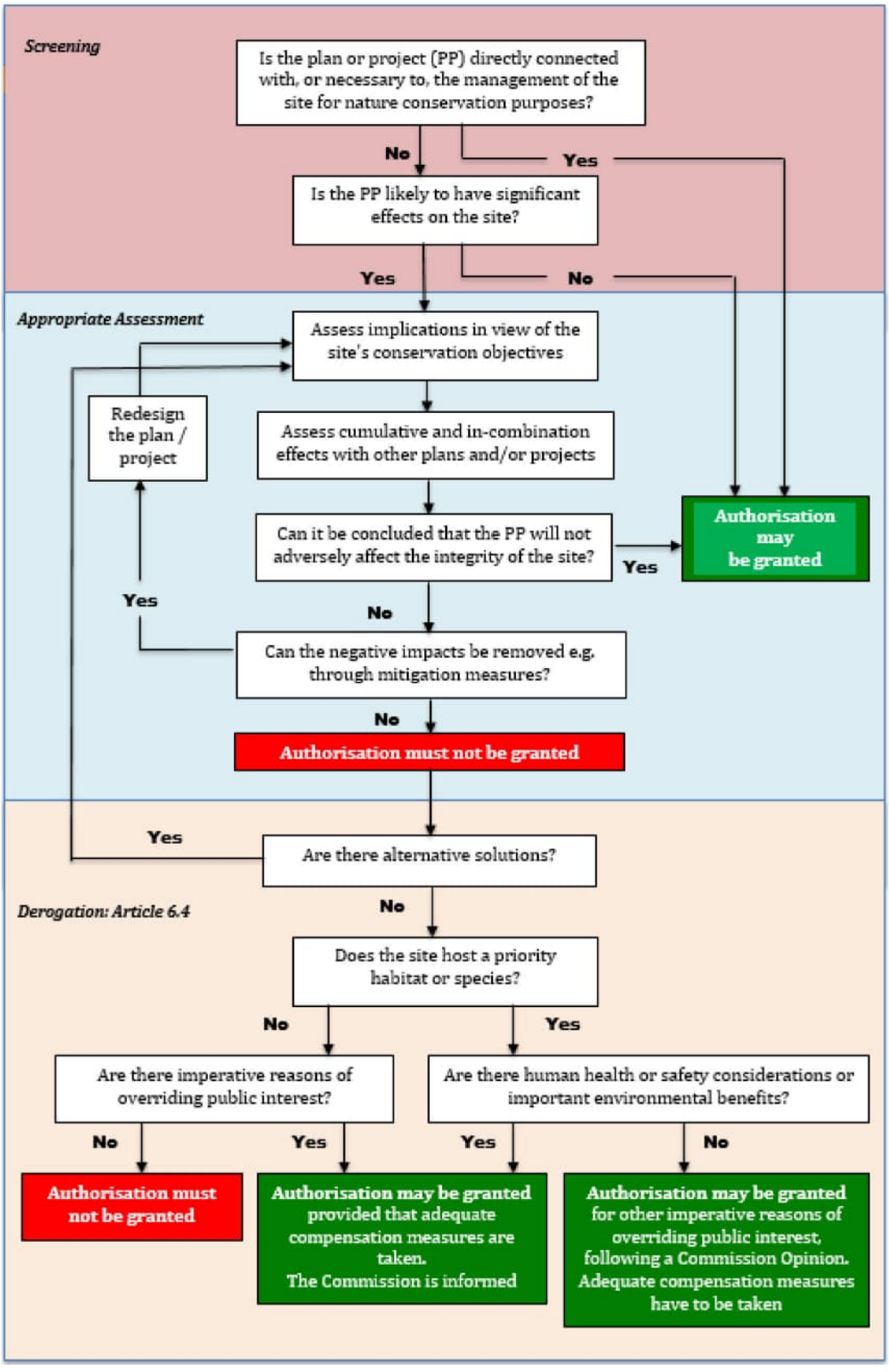
3.3.4. Following the judgement handed down by the CJEU in Case C-323/17[8], it is no longer appropriate to consider measures taken specifically to reduce a project's potential impact on European designated sites into account at the screening stage. Accordingly, no reference to mitigation is made, or relied upon, in this screening assessment.

3.4 FURTHER HRA STAGES (STAGE 2, 3 AND 4)

3.4.1. Stages 2, 3 and 4 are outside of the purpose of this report, which covers only Stage 1 (screening). The findings of this report will define the scope of the assessment of LSEs through an Appropriate Assessment (Stage 2) if they are identified. The Appropriate Assessment would, where necessary, identify alternative solutions to the Proposed Scheme (Stage 3), and also inform any IROPI arguments at Stage 4 that may be required. If options identified at Stage 2 cannot avoid or mitigate adverse effects, then development consent can only be given if Stages 3 and 4 are followed and passed.

[8] Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta ('People over Wind').

Chart illustrating the HRA process



4 IDENTIFICATION OF HABITATS SITES

4.1 STUDY AREA AND SITES IDENTIFIED

4.1.1. This defines the geographic limits from the Proposed Strategy used to identify National Network sites to be considered within the HRA process and be screened for LSEs. The Study Area reflects the high sensitivity of qualifying features of National Network sites and the fact they often support species that are mobile and wide ranging, such as birds.

4.1.2. The principal criterion defining the Study Area is a zone of 10km surrounding the London Borough of Westminster, as measured from the borough boundary, as the Proposed Strategy will cover the whole borough (shown in Figure 1). This distance appropriate to encompass possible effect pathways from the Proposed Strategy to National Network sites. All National Network sites within this zone have been included into the screening stage of the HRA process to identify potential LSEs.

4.2 SITES IDENTIFIED

4.2.1. Four National Network sites were identified that met the Study Area criteria as described above. They are listed below alongside a summary of their qualifying features:

- **Richmond Park SAC** – is of importance as the site is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus* along with its diverse deadwood beetle fauna associated with the ancient trees found throughout the parkland. The site is 7.2km from the London Borough of Westminster.
- **Wimbledon Common SAC** – has been designated since it supports stag beetle along with an extensive area of open, wet heath on acidic soil and contains a variety of other acidic heath and grassland communities. The site is 6.3km from the London Borough of Westminster.
- **Lee Valley SPA** – comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that display a range of man-made and semi-natural wetland and valley bottom habitats. It stretches over a distance of 26km northward along the River Lea to the north of London. The site is 7.4km from the London Borough of Westminster.
- **Lee Valley Ramsar** – shares a common boundary with the SPA and is also designated for a range of wetland and valley bottom habitat which support a diverse range of wetland fauna and flora. The site is 7.4km from the London Borough of Westminster.

4.2.2. Details of Qualifying Features for Richmond Park SAC, Wimbledon Common SAC and Lee Valley SPA are provided in Table 4-1. They are shown in Figure 1.

4.2.3. Lee Valley Ramsar qualifies as a wetland of international importance because it meets two criteria:

- Internationally important numbers of wintering gadwall and shoveler; and
- The nationally scarce plant species whorled watermilfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a waterboatman).

4.2.4. In addition, the site supports nationally important numbers of cormorant *Phalacrocorax carbo,* great crested grebe *Podiceps cristatus,* tufted duck *Aythya fuligula*, pochard *Aythya farina,* grey heron *Ardea cinerea,* and bittern.

Table 4-1 – National Network site qualifying features

National Network Site	Qualifying Feature	Description[9]
Richmond Park SAC	Stag beetle	The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the Annex II species Stag beetle.
Wimbledon Common SAC	European dry heaths	The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the Annex I habitat European dry heaths.
	Northern Atlantic wet heaths with *Erica tetralix*. (wet heathland with cross-leaved heath)	The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the Annex I habitat Northern Atlantic wet heaths with *Erica tetralix*. (wet heathland with cross-leaved heath).
	Stag beetle	The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the Annex II species Stag beetle.
Lee Valley SPA	Bittern *Botaurus stellaris*	The site qualifies under article 4.1 of the Habitats Directive as it is used regularly by 1% or more of the Great Britain population of a species listed on Annex 1, in any Season. In this instance it is used by 6% of the British population of Bittern.
	Shoveler *Anas clypatea*	The site qualifies under article 4.2 of the Habitats Directive as it is used regularly by 1% or more of the biogeographical populations of the regularly occurring migratory species (other than those listed on annex 1). It is nominated for hosting 1% of the population of shoveler.
	Gadwall *Anas strepera*	The site qualifies under article 4.2 of the Habitats Directive as it is used regularly by 1% or more of the biogeographical populations of the regularly occurring migratory species (other than those listed on annex 1). It is nominated for hosting 1% of the population of gadwall.

[9] Joint Nature Conservation Committee. Available at: https://sac.jncc.gov.uk/habitat/.

4.3 CONSERVATION OBJECTIVES

4.3.1. Conservation objectives for Richmond Park SAC and Wimbledon Common SAC comprise the following:

- Maintain or restore the extent and distribution of qualifying habitats and habitats of qualifying species.
- Maintain or restore the structure and function (including typical species) of qualifying natural habitats.
- Maintain or restore the structure and function of the habitats of qualifying species.
- Maintain or restore the supporting processes on which qualifying natural habitats and the habitats of qualifying species rely.
- Maintain or restore the populations of qualifying species.
- Maintain or restore the distribution of qualifying species within the site.

4.3.2. Conservation objectives for Lee Valley SPA comprise the following:

- Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
    - The extent and distribution of the habitats of the qualifying features
    - The structure and function of the habitats of the qualifying features
    - The supporting processes on which the habitats of the qualifying features rely
    - The population of each of the qualifying features, and,
    - The distribution of the qualifying features within the site.

5 SCREENING ASSESSMENT

5.1 HABITATS SITE MANAGEMENT STATEMENT

5.1.1. The Proposed Strategy is not directly connected with, or necessary for, the management of any National Network site identified in Section 4 as within the HRA Study Area. The Proposed Strategy has not been conceived solely to further the conservation of these sites and nor is it essential to the management of this site.

5.2 IDENTIFICATION OF IMPACTS AND LIKELY EFFECTS

DESK-BASED ACTIONS

5.2.1. The LFRMS Objectives and Measures prescribe mostly desk-based actions that will inform the implementation of the Proposed Strategy and collect data for future decision makers, but do not in themselves imply potential physical changes to the environment. These desk-based actions do not constitute impacts that could lead to effects on National Network sites and thus have not been included in the scope of the screening assessment.

5.2.2. Desk-based actions comprise:

- All actions under Objective 1.
- Actions 2.1.1, 2.1.2, 2.2.6, 2.2.7, and 2.3.1 to 2.3.4 under Objective 2.
- All actions under Objective 3.
- Actions 4.1.1 to 4.1.3 under Objective 4.
- All actions under Objective 5.

ACTIONS THAT COULD RESULT IN ENVIRONMENTAL IMPACTS

5.2.3. Remaining actions prescribed under the LFRMS could lead to physical changes to the environment through their implementation by WCC, other public bodies or private developers. Works that would be undertaken to implement LFRMS actions are not specifically defined, but may constitute impacts with potential effects on National Network site Qualifying Features, such as those involving creation of SuDS features or installation of flood alleviation features in elements of the public realm. This may be through works undertaken via permitted development rights or via planning consents issued by WCC; the LFRMS does not include designs or timescales for physical works itself, and these would occur as a result of implementation of the actions within Westminster during the period 2024 – 2030. Actions that could lead to impacts are:

- Action 2.2.1 - Engage with Westminster internal teams to develop the integration of SuDS into Westminster owned properties.
- Action 2.2.2 - Develop standard details for different SuDS elements for easy integration into Westminster's public realm and highways schemes.
- Action 2.2.3 - Provide design advice for ongoing public realm and highways schemes.
- Action 2.2.4 - Develop SuDS masterplan for the SuDS Catchments, to identify potential areas within Westminster which would be suitable for SuDS and provide flood risk and wider benefits.
- Action 2.2.5 - Retrofit SuDS within the identified SuDS Catchments.
- Action 2.2.8 - Develop targeted policy to encourage rainwater harvesting / reuse.

- Action 2.2.9 - Develop innovative solutions to remove Surface Water Runoff from the Thames Water Combined Sewer System including assessing the opportunity to establish a separate surface water sewer in Westminster by 2050.
- Action 2.2.10 - Develop a standardised maintenance and management plan (including estimated costs and maintenance schedules) for SuDS implemented in Westminster's public realm and highways.
- Action 4.2.1 - Update planning guidance for developers to ensure that flood risk and SuDS are considered in all new developments, with preference for above ground SuDS.

5.2.4. Table 5-1 below identifies potential effects on National Network sites that could result from implementation of the LFRMS, through impacts of its actions. The City of Westminster does not coincide with the boundaries of any National Network sites, and thus only indirect impacts (i.e. those transmitted through an intermediary pathway, such as emissions resulting in deposition of dust or chemicals, or waterborne pollution) would occur. Potential effects of impacts could occur during the construction or operation of physical features resulting from implementation of LFRMS.

Table 5-1 – Potential effects of LFRMS impacts

Phase	Potential Effect	Description
Construction	Fragmentation of supporting habitats	Implementation of the LFRMS through the planning system and public works undertaken by WCC (e.g. creation of new SuDS features or alterations to drainage infrastructure) could lead to works that require removal of habitat within greenspaces and along water courses in Westminster. Although this would be remote from National Network sites, it may lie on routes used by mobile species associated with such sites (birds, bats etc) to disperse, commute, feed or otherwise navigate the wider landscape.
Construction	Dust and particulate emissions	Implementation of the LFRMS could lead to works that, during construction, release dust and particulate emissions whose deposition may negatively affect the condition of habitats (such as through smothering of plants or changing soil chemistry) and the species that rely on them.
Construction	Air quality changes from emissions	Implementation of the LFRMS could lead to works that, during construction, could result in emissions from construction vehicles and equipment. These changes in air quality could lead to deposition of pollutants, including nitrogen, changing the soil chemistry and composition of plant communities, and consequently the species that rely on them.
Construction	Sediment and chemical run-off	Implementation of the LFRMS could lead to works that, during construction, result in sediments and pollutants entering water course. This could affect habitats and species within these water courses and in downstream areas adversely.
Operation	Changes in hydrological conditions	Implementation of the LFRMS could lead to works that, during operation, change the supply of water to downstream habitats and consequently the communities of plants and animals they support.

5.3 CONSIDERATION OF LIKELY EFFECTS AND THEIR SIGNIFICANCE

5.3.1. Relevant threats and pressures identified for National Network sites in their supporting documentation have been considered against impacts and potential effects of the Proposed Strategy, and information included within Section 2 of this report describing it, to screen for LSEs on Qualifying Features and their Conservation Objectives.

Qualifying Feature	Potential effects of LFRMS	LSE?	Reasoning
Richmond Park SAC			
Stag beetle	Fragmentation of supporting habitats (Construction)	No	The long distance (7.2km) between the City of Westminster and Richmond Park SAC, as well as the highly urban nature of land uses in Westminster, coupled with the relatively small-scale of individual works that would result from LFRMS actions makes it unlikely habitats used by stag beetle would be subject to fragmentation by the Proposed Strategy.
	Dust and particulate emissions (Construction)	No	Dust and particulate emissions would be localised and would not traverse the long distance (7.2km) between the City of Westminster and Richmond Park SAC[10]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Richmond Park SAC through dust and particulate emissions.
	Air quality changes from emissions (Construction)	No	Emissions would occur from construction vehicles and equipment associated with work sites. Resulting air quality changes would not traverse the long distance (7.2km) between the City of Westminster and Richmond Park SAC[11]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Richmond Park SAC through air quality changes from emissions.
	Sediment and chemical run-	No	Westminster is not hydrologically connected to Richmond Park SAC, which lies upstream within the Thames Basin. Therefore, any sediment and chemical run-off from construction activities associated with the Proposed Strategy would not be transmitted to this site to affect stag beetle.

[10] Institute of Air Quality Management. (2023). 'Guidance on the Assessment of Dust from Demolition and Construction'. Available at: https://iaqm.co.uk/wp-content/uploads/2013/02/Construction-dust-2023-BG-v6-amendments.pdf

[11] Habitats Directive. (2014). 'Technical guidance on detailed modelling approach for an appropriate assessment for emissions to air'. Available at: https://ukwin.org.uk/files/ea-disclosures/AQTAG06_Mar2014%20.pdf

Qualifying Feature	Potential effects of LFRMS	LSE?	Reasoning
	off (Construction)		
	Changes in hydrological conditions (Operation)	No	Westminster is not hydrologically connected to Richmond Park SAC, which lies upstream within the Thames Basin. Therefore, any hydrological changes resulting from operation of SuDS features would not be transmitted to this site to affect stag beetle.
Wimbledon Common SAC			
European dry heaths	Fragmentation of supporting habitats (Construction)	No	Heathland habitat is absent from the urban land uses within the City of Westminster. Works within the City as part of the Proposed Strategy will therefore not lead to effects on supporting habitat for this Qualifying Feature of Wimbledon Common SAC.
	Dust and particulate emissions (Construction)	No	Dust and particulate emissions would be localised and would not traverse the long distance (6.3km) between the City of Westminster and Wimbledon Common SAC[10]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Wimbledon Common SAC through dust and particulate emissions.
	Air quality changes from emissions (Construction)	No	Emissions would occur from construction vehicles and equipment associated with work sites. Resulting air quality changes would not traverse the long distance (6.3km) between the City of Westminster and Wimbledon Common SAC[11]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Wimbledon Common SAC through air quality changes from emissions.
	Sediment and chemical run-off (Construction)	No	Westminster is not hydrologically connected to Wimbledon Common SAC, which lies upstream within the Thames Basin. Therefore, any sediment and chemical run-off from construction activities associated with the Proposed Strategy would not be transmitted to this site to affect European dry heaths.

Qualifying Feature	Potential effects of LFRMS	LSE?	Reasoning
	Changes in hydrological conditions (Operation)	No	Westminster is not hydrologically connected to Wimbledon Common SAC, which lies upstream within the Thames Basin. Therefore, any hydrological changes resulting from operation of SuDS features would not be transmitted to this site to affect European dry heaths.
Northern Atlantic wet heaths with *Erica tetralix*. (wet heathland with cross-leaved heath)	Fragmentation of supporting habitats (Construction)	No	Heathland habitat is absent from the urban land uses within the City of Westminster. Works within the City as part of the Proposed Strategy will therefore not lead to effects on supporting habitat for this Qualifying Feature of Wimbledon Common SAC.
	Dust and particulate emissions (Construction)	No	Dust and particulate emissions would be localised and would not traverse the long distance (6.3km) between the City of Westminster and Wimbledon Common SAC[10]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Wimbledon Common SAC through dust and particulate emissions.
	Air quality changes from emissions (Construction)	No	Emissions would occur from construction vehicles and equipment associated with work sites. Resulting air quality changes would not traverse the long distance (6.3km) between the City of Westminster and Wimbledon Common SAC[11]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Wimbledon Common SAC through air quality changes from emissions.
	Sediment and chemical run-off (Construction)	No	Westminster is not hydrologically connected to Wimbledon Common SAC, which lies upstream within the Thames Basin. Therefore, any sediment and chemical run-off from construction activities associated with the Proposed Strategy would not be transmitted to this site to affect Northern Atlantic wet heaths with *Erica tetralix*.
	Changes in hydrological conditions (Operation)	No	Westminster is not hydrologically connected to Wimbledon Common SAC, which lies upstream within the Thames Basin. Therefore, any hydrological changes resulting from operation of SuDS features would not be transmitted to this site to affect Northern Atlantic wet heaths with *Erica tetralix*.
Stag beetle	Fragmentation of supporting	No	The long distance (6.3km) between the City of Westminster and Wimbledon Common SAC, as well as the highly urban nature of land uses in Westminster, coupled with the relatively small-scale of

Qualifying Feature	Potential effects of LFRMS	LSE?	Reasoning
	habitats (Construction)		individual works that would result from LFRMS actions makes it unlikely habitats used by stag beetle would be subject to fragmentation by the Proposed Strategy.
	Dust and particulate emissions (Construction)	No	Dust and particulate emissions would be localised and would not traverse the long distance (6.3km) between the City of Westminster and Wimbledon Common SAC[10]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Wimbledon Common SAC through dust and particulate emissions.
	Air quality changes from emissions (Construction)	No	Emissions would occur from construction vehicles and equipment associated with work sites. Resulting air quality changes would not traverse the long distance (6.3km) between the City of Westminster and Wimbledon Common SAC[11]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Wimbledon Common SAC through air quality changes from emissions.
	Sediment and chemical run-off (Construction)	No	Westminster is not hydrologically connected to Wimbledon Common SAC, which lies upstream within the Thames Basin. Therefore, any sediment and chemical run-off from construction activities associated with the Proposed Strategy would not be transmitted to this site to affect stag beetle.
	Changes in hydrological conditions (Operation)	No	Westminster is not hydrologically connected to Wimbledon Common SAC, which lies upstream within the Thames Basin. Therefore, any hydrological changes resulting from operation of SuDS features would not be transmitted to this site to affect stag beetle.
Lee Valley SPA			
Bittern	Fragmentation of supporting habitats (Construction)	No	The long distance (7.4km) between the City of Westminster and Richmond Park SAC, as well as the highly urban nature of land uses in Westminster, coupled with the relatively small-scale of individual works that would result from LFRMS actions makes it unlikely habitats used by stag beetle would be subject to fragmentation by the Proposed Strategy.
	Dust and particulate	No	Dust and particulate emissions would be localised and would not traverse the long distance (7.4km) between the City of Westminster and Lee Valley SPA[10]. Thus, works resulting from the Proposed

Qualifying Feature	Potential effects of LFRMS	LSE?	Reasoning
	emissions (Construction)		Strategy would not result in likely significant effects on Lee Valley SPA through dust and particulate emissions.
	Air quality changes from emissions (Construction)	No	Emissions would occur from construction vehicles and equipment associated with work sites. Resulting air quality changes would not traverse the long distance (7.4km) between the City of Westminster and Lee Valley SPA[11]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Lee Valley SPA through air quality changes from emissions.
	Sediment and chemical run-off (Construction)	No	Westminster is not hydrologically connected to Lee Valley SPA, which lies in a different catchment outside of the Thames Basin. Therefore, any sediment and chemical run-off from construction activities associated with the Proposed Strategy would not be transmitted to this site to affect bittern.
	Changes in hydrological conditions (Operation)	No	Westminster is not hydrologically connected to Lee Valley SPA, which lies in a different catchment outside of the Thames Basin. Therefore, any hydrological changes resulting from operation of SuDS features would not be transmitted to this site to affect bittern.
Shoveler	Fragmentation of supporting habitats (Construction)	No	The long distance (7.4km) between the City of Westminster and Lee Valley SPA, as well as the highly urban nature of land uses in Westminster, coupled with the relatively small-scale of individual works that would result from LFRMS actions makes it unlikely habitats used by shoveler would be subject to fragmentation by the Proposed Strategy.
	Dust and particulate emissions (Construction)	No	Dust and particulate emissions would be localised and would not traverse the long distance (7.2km) between the City of Westminster and Lee Valley SPA[10]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Lee Valley SPA through dust and particulate emissions.
	Air quality changes from emissions (Construction)	No	Emissions would occur from construction vehicles and equipment associated with work sites. Resulting air quality changes would not traverse the long distance (7.2km) between the City of Westminster and Lee Valley SPA[11]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Lee Valley SPA through air quality changes from emissions.

Qualifying Feature	Potential effects of LFRMS	LSE?	Reasoning
	Sediment and chemical run-off (Construction)	No	Westminster is not hydrologically connected to Lee Valley SPA, which lies in a different catchment outside of the Thames Basin. Therefore, any sediment and chemical run-off from construction activities associated with the Proposed Strategy would not be transmitted to this site to affect shoveler
	Changes in hydrological conditions (Operation)	No	Westminster is not hydrologically connected to Lee Valley SPA, which lies in a different catchment outside of the Thames Basin. Therefore, any hydrological changes resulting from operation of SuDS features would not be transmitted to this site to affect shoveler.
Gadwall	Fragmentation of supporting habitats (Construction)	No	The long distance (7.4km) between the City of Westminster and Lee Valley SPA, as well as the highly urban nature of land uses in Westminster, coupled with the relatively small-scale of individual works that would result from LFRMS actions makes it unlikely habitats used by gadwall would be subject to fragmentation by the Proposed Strategy.
	Dust and particulate emissions (Construction)	No	Dust and particulate emissions would be localised and would not traverse the long distance (7.2km) between the City of Westminster and Lee Valley SPA[10]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Lee Valley SPA through dust and particulate emissions.
	Air quality changes from emissions (Construction)	No	Emissions would occur from construction vehicles and equipment associated with work sites. Resulting air quality changes would not traverse the long distance (7.2km) between the City of Westminster and Lee Valley SPA[11]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Lee Valley SPA through air quality changes from emissions.
	Sediment and chemical run-off (Construction)	No	Westminster is not hydrologically connected to Lee Valley SPA, which lies in a different catchment outside of the Thames Basin. Therefore, any sediment and chemical run-off from construction activities associated with the Proposed Strategy would not be transmitted to this site to affect gadwall.
	Changes in hydrological	No	Westminster is not hydrologically connected to Lee Valley SPA, which lies in a different catchment outside of the Thames Basin. Therefore, any hydrological changes resulting from operation of SuDS features would not be transmitted to this site to affect gadwall.

Qualifying Feature	Potential effects of LFRMS	LSE?	Reasoning
	conditions (Operation)		
Lee Valley Ramsar			
Internationally important numbers of wintering gadwall and shoveler	Fragmentation of supporting habitats (Construction)	No	The long distance (7.4km) between the City of Westminster and Lee Valley SPA, as well as the highly urban nature of land uses in Westminster, coupled with the relatively small-scale of individual works that would result from LFRMS actions makes it unlikely habitats used by gadwall and shoveler would be subject to fragmentation by the Proposed Strategy.
	Dust and particulate emissions (Construction)	No	Dust and particulate emissions would be localised and would not traverse the long distance (7.2km) between the City of Westminster and Lee Valley Ramsar[10]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Lee Valley Ramsar through dust and particulate emissions.
	Air quality changes from emissions (Construction)	No	Emissions would occur from construction vehicles and equipment associated with work sites. Resulting air quality changes would not traverse the long distance (7.2km) between the City of Westminster and Lee Valley Ramsar[11]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Lee Valley Ramsar through air quality changes from emissions.
	Sediment and chemical run-off (Construction)	No	Westminster is not hydrologically connected to Lee Valley Ramsar, which lies in a different catchment outside of the Thames Basin. Therefore, any sediment and chemical run-off from construction activities associated with the Proposed Strategy would not be transmitted to this site to affect wintering gadwall and shoveler.
	Changes in hydrological conditions (Operation)	No	Westminster is not hydrologically connected to Lee Valley Ramsar, which lies in a different catchment outside of the Thames Basin. Therefore, any hydrological changes resulting from operation of SuDS features and other works associated with the Proposed Strategy would not be transmitted to this site to affect wintering gadwall and shoveler.
Whorled watermilfoil *Myriophyllum*	Fragmentation of supporting	No	The long distance (7.4km) between the City of Westminster and Lee Valley Ramsar, as well as the highly urban nature of land uses in Westminster, coupled with the relatively small-scale of individual works that would result from LFRMS actions makes it unlikely habitats used by *Myriophyllum*

Qualifying Feature	Potential effects of LFRMS	LSE?	Reasoning
verticillatum / *Micronecta minutissima* (a waterboatman)	habitats (Construction)		*verticillatum* and *Micronecta minutissima* would be subject to fragmentation by the Proposed Strategy.
	Dust and particulate emissions (Construction)	No	Dust and particulate emissions would be localised and would not traverse the long distance (7.2km) between the City of Westminster and Lee Valley Ramsar[10]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Lee Valley Ramsar through dust and particulate emissions.
	Air quality changes from emissions (Construction)	No	Emissions would occur from construction vehicles and equipment associated with work sites. Resulting air quality changes would not traverse the long distance (7.2km) between the City of Westminster and Lee Valley Ramsar[11]. Thus, works resulting from the Proposed Strategy would not result in likely significant effects on Lee Valley Ramsar through air quality changes from emissions.
	Sediment and chemical run-off (Construction)	No	Westminster is not hydrologically connected to Lee Valley Ramsar, which lies in a different catchment outside of the Thames Basin. Therefore, any sediment and chemical run-off from construction activities associated with the Proposed Strategy would not be transmitted to this site to affect either *Myriophyllum verticillatum* or *Micronecta minutissima*.
	Changes in hydrological conditions (Operation)	No	Westminster is not hydrologically connected to Lee Valley Ramsar, which lies in a different catchment outside of the Thames Basin. Therefore, any hydrological changes resulting from operation of SuDS features and other works associated with the Proposed Strategy would not be transmitted to this site to affect either *Myriophyllum verticillatum* or *Micronecta minutissima*.

5.4 IN-COMBINATION EFFECTS

5.4.1. When determining the potential implications of a plan or project in light of the conservation objectives for a National Network site (i.e. assessing the potential for LSE and ascertaining the potential for effect on site integrity), it is necessary to consider the potential for in-combination effects with other plans and projects on the designated interest features/conservation on the site. This should include:

- Approved but as yet uncompleted plans or projects;
- Permitted on-going activities such as discharge consents of abstraction licences; and
- Plans and projects for which an application has been made and which are currently under consideration but not yet approved by competent authorities.

5.4.2. An in-combination assessment considers the potential for each plan or project to influence the site. In order for an in-combination effect to arise, the nature of two effects does not necessarily have to be the same. The in-combination assessment, therefore, focuses on the overall implications for site conservation objectives regardless of the type of effect.

5.4.3. No in-combination effects are anticipated. Although other large infrastructure schemes are active in the wider region, such as the HS2 rail project from London to Birmingham, there are no effect pathways linking them with the Proposed Strategy whose physical works will be relatively small and localised to urban areas within the City of Westminster. The distance between the area covered by the Proposed Strategy and identified National Network sites isolates potential effects to the area within and immediately surrounding the City of Westminster. This will prevent interactions that could lead to in-combination effects with these large developments.

5.4.4. In addition, a search of the Westminster Planning Portal, and planning portals of London Boroughs between Westminster and the National Network sites revealed a wide variety of developments within the local area, but all are relatively small scale and will not interact with the Proposed Strategy to cause in-combination effects on National Network sites that would lead to LSEs.

6 RESULTS OF SCREENING AND CONCLUSIONS

6.1.1. Screening of the Proposed Strategy has been undertaken for four National Network sites:

- Richmond Park SAC
- Wimbledon Common SAC
- Lee Valley SPA
- Lee Valley Ramsar

6.1.2. The screening process was undertaken the absence of mitigation. A ruling by the Court of Justice of the European Union (CJEU)[12] requires that mitigation measures should only be considered at Stage 2 Appropriate Assessment and not at screening stage or as an embedded element of a project. However, suitable measures to avoid and mitigate LSEs can be applied at Stage 2 Appropriate Assessment stage and LSEs that have been identified could be managed through the application of good working practices that would mitigate for potential adverse effects during the operation stage.

6.1.3. However, screening did not identify any LSEs (alone or in-combination with other plans or projects) that could result in adverse effects on integrity for any of the four National Network sites. It can be concluded that the implementation of the Proposed Strategy will not lead to adverse effects on the integrity of National Network sites. Therefore, no further stages of HRA are required for the competent authority to make an informed decision on the Proposed Strategy.

[12] Case C-258/11, Sweetman v. An Bord Pleanála, CJEU judgment 11 April 2013

Appendix A

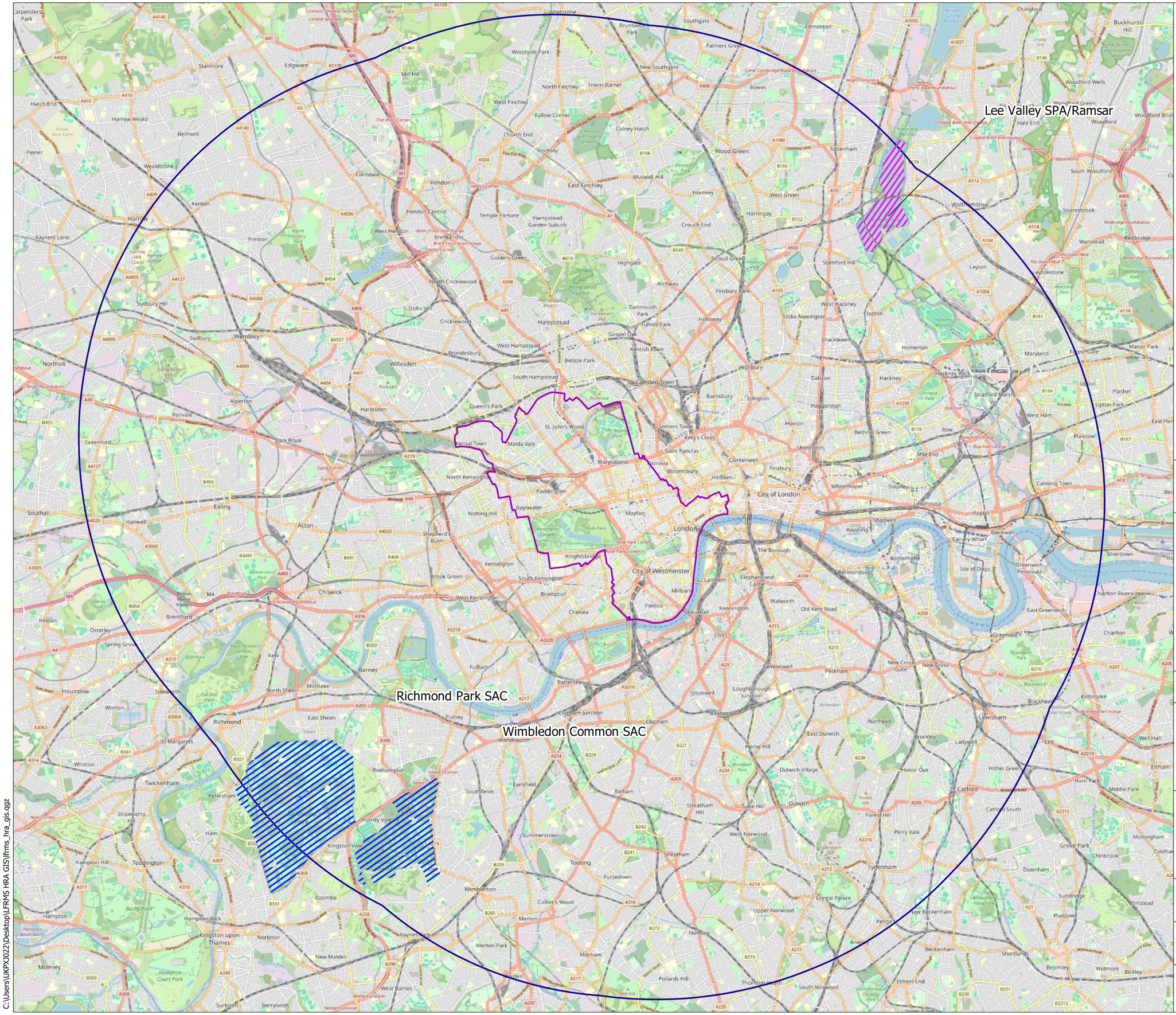
LFRMS DOCUMENT

Public

Appendix B

FIGURES

Public



LEGEND:

- City of Westminster
- 10km Study Area
- Special Area of Conservation (SAC)
- Special Protection Area (SPA)
- Ramsar sites

STATUS:

FOR INFORMATION ONLY

WSP House, 70 Chancery Lane
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CLIENT: Westminster City Council

PROJECT: Local Flood Risk Management Strategy

TITLE: Study Area and National Network Sites

SCALE @A3:	DRAWN:	APPROVED:
1:150,000	PJ	PJ
VERSION: 1	DATE: 06/09/24	DATE: 06/09/24
PROJECT No: UK0029995.0642	DRAWING No: Figure 1	

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