Westminster City Council

Westminster Local Flood Risk Management Strategy

SEA Report – Non Technical Summary



September 2024

Public

Westminster City Council

Westminster Local Flood Risk Management Strategy

SEA Report – Non Technical Summary

Type of document (version) Public

Project no. 70112284

Date: September 2024

WSP

WSP House
70 Chancery Lane
London
WC2A 1AF

Phone: +44 20 7314 5000

WSP.com

Quality control

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	First Draft	Final for Consultation		
Date	September 2024	September 2024		
Prepared by	Charlotte Town	Charlotte Town		
Signature				
Checked by	Katie Dean			
Signature				
Authorised by	Katie Dean	Katie Dean		
Signature				
Project number	70112284	70112284		
Report number	V1	V2		

Contents

1	**Introduction**	**1**
1.1	**Overview**	**1**
1.2	**Local Flood Risk Management Strategy**	**1**
2	**Methodology**	**2**
2.1	**What is SEA**	**2**
2.2	**SEA Methodology**	**2**
	Identification of Sustainability Issues and Opportunities	2
3	**SEA Assessment Findings**	**4**
3.1	**Assessment of Measures and Actions**	**4**
3.2	**Assessment of Alternatives**	**5**
4	**Cumulative Effects**	**7**
4.2	**Intra-Project Effects**	**7**
4.3	**Inter-Project Effects**	**7**
5	**Mitigation, Enhancements and Monitoring**	**9**
5.1	**Mitigation and Enhancement Measures**	**9**
5.2	**Monitoring Measures**	**13**
6	**Next Steps**	**16**

Tables

Table 3-1 – Summary of Significant Effects – Measures and Actions Assessment 4

Table 5-1 – Proposed Mitigation and Enhancement Measures 10
Table 5-2 – Proposed Monitoring Measures 13

1 Introduction

1.1 Overview

1.1.1. Westminster City Council (WCC) is in the process of preparing a new Local Flood Risk Management Strategy (hereafter referred to as the 'LFRMS'). This will replace the existing WCC LFRMS[1], which was agreed in 2017.

1.1.2. The LFRMS will focus on local sources of flood risk but will also acknowledge and consider other sources of flood risk (including sewers) and other associated Risk Management Authorities (RMAs).

1.2 Local Flood Risk Management Strategy

1.2.1. WCC previously produced a LFRMS for 2017 – 2022. This Strategy will build upon the lessons from the previous Strategy: to continue to develop understanding of flood risk and improve how management of it.

1.2.2. This LFRMS 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 RMAs. This strategy also considers the impact of climate change on flooding in the future and attempts to minimise these risks.

1.2.3. The LFRMS sets out the flood risk management Objectives, Measures and Actions. These three groupings provide different levels of detail on how flood risk will be managed.

1.2.4. Objectives are defined as the overarching vision, 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.

1.2.5. The LFRMS includes five objectives, with 14 measures that align to these objectives.

1.2.6. Further details on the aims, objectives and measures and actions can be found in **Section 2** of the main **SEA Report**.

[1] Westminster City Council (2017) Local Flood Risk Management Strategy 2017 – 2022.

2 Methodology

2.1 What is SEA

2.1.1. SEA is a systematic process that is undertaken during the preparation of a plan. Its role is to promote sustainable development by assessing environmental, social, and economic impacts, as well as mitigating any potential adverse effects that the plan might otherwise have.

2.2 SEA Methodology

2.2.1. SEA is a continual process of gathering data and evidence, assessment of environmental effects, developing mitigation measures and making recommendations to refine plans or programmes in view of the predicted environmental effects.

2.2.2. The Key stages of the SEA process are the following:

- **Stage A:** Production of a scoping report which sets the context of the LFRMS, identified other relevant policies, plans and programmes, baseline information and sustainability objectives. This was undertaken in August 2024;
- **Stage B:** Assessment of draft objectives, measures, action plan and alternative objective and measures;
- **Stage C :** Preparation of the environmental report. The report is then consulted on alongside the draft LFRMS;
- **Stage D (this stage):** Consultation on the preferred LFRMS and the SEA Report. Updating of the LFRMS and SEA Report to reflect consultation responses and preparation of the preferred LFRMS; and
- **Stage E:** Monitoring the significant effects of implementing the LFRMS.

2.2.3. Full details on the methodology can be found in **Section 3** of the IIA Report.

Identification of Sustainability Issues and Opportunities

2.2.4. The SEA Scoping Report, outlined key baseline information, identified key sustainability issues in the borough and identified future trends which could occur without implementation of the LFRMS.

2.2.5. Following the findings identified at scoping, an SEA Appraisal Framework has been produced, which was used to guide the assessment process of the plans and strategies.

2.2.6. This Appraisal Framework has guided the SEA assessment of the LFRMS and is shown below.

- **SEA1:** To increase and enhance flood protection to meet both the current and future demographic changes and protect and enhance human health, quality of life and wellbeing;
- **SEA2:** To increase levels of flood protection and resilience for local businesses and the local economy;
- **SEA3:** To protect and enhance protected habitats, species and valuable ecological networks that contribute to ecosystem functionality, contributing to biodiversity net gain;
- **SEA4:** To protect and enhance WCC's townscapes and landscapes;
- **SEA5:** To protect and enhance the historic environment, including heritage assets (designated and non-designated) and their unique settings;
- **SEA6:** To maintain and enhance the quality of surface and groundwater;
- **SEA7:** Ensure that infrastructure is resilient to the effects of climate change and supports low carbon energy efficient design;
- **SEA8:** To reduce the risk and vulnerability to flooding;
- **SEA9:** Minimise the potential impact of flooding to transport and other critical infrastructure, both at present and in the future; and
- **SEA10:** To maintain and protect soil quality particularly within green spaces and WCC's Royal Parks.

3 SEA Assessment Findings

3.1 Assessment of Measures and Actions

3.1.1. The assessment of the LFRMS measures and actions was carried out in relation to the SEA Objectives. A summary of the significant effects are detailed in **Table 3-1** below. No significant negative effects were identified.

3.1.2. It should be noted that the assessment of measures and actions within objectives have been standalone assessments, which purely assess the outcome of the application of those policies rather than their relationship with other policies within the LFRMS. Further details on the assessment of the LFRMS measures can be found within **Section 6** of the main SEA Report and **Appendix D** to the main SEA Report.

Table 3-1 – Summary of Significant Effects – Measures and Actions Assessment

Significance	Number of Significant Effects	Summary of Effects
Significant Positive (++)	16	▪ Measures and actions that contribute to improving the resilience of Westminster for current and future generations, as well as improving engagement and reducing inequalities and distress caused by flood risk (SEA1); ▪ Measures and actions that improve business resilience and reduce the cost of flooding (SEA2); ▪ Measures and actions that contribute to protecting and enhancing biodiversity (SEA3); ▪ Measures and actions that improve water quality, reduce surface runoff and sewage release (SEA6); ▪ Measures and actions that include improved climate resilience measures (SEA7); ▪ Measures and actions that reduce food risk and improve flooding resilience (SEA8); and

Significance	Number of Significant Effects	Summary of Effects
		▪ Measures and actions that protect the transport and critical infrastructure (SEA9).
Uncertain (?)	1	▪ Measures and actions that have potential to affect the setting of heritage assets dependent on locations of development (SEA5).

3.2 Assessment of Alternatives

3.2.1. The SEA Regulations require an assessment of the plan and its "reasonable alternatives", in addition to those proposed within the preferred LFRMS. Without this, there cannot be a proper environmental evaluation of the preferred LFRMS. The assessment of reasonable alternatives does not need to include all possible alternatives, but only those that are realistic.

3.2.2. The development of the LFRMS Measures has not at this stage identified any key alternatives, so the assessment of alternatives has assessed the scenario of the continuation of the existing LFRMS.

3.2.3. In general, the existing strategy has performed similarly to the proposed LFRMS, as many of the objectives and measures overlap and ultimately will ensure flood protection. Significant positive effects are likely to remain for SEA1 (population, equalities and health) and SEA8 (flood risk) through the continuation of this strategy.

3.2.4. Where the two strategies differ slightly is through the alignment with the London Plan 2021, the updated Strategic Flood Risk Assessment (SFRA), and developing a better response to the flooding events of 2021. In the previous strategy, there is no objective that proposes the use of flood risk modelling, meaning the measures do not account for the 2021 flood events or include up to date information that can inform flood risk planning.

3.2.5. Additionally, the London Plan 2021 includes policies on both flood risk management and sustainable drainage. Given this plan was adopted in 2021, the existing strategy is not

considered to be fully aligned to the plan, whilst the new LFRMS is anticipated to result in improved joining up of flood risk management across London's Boroughs.

3.2.6. Overall, as the new strategy includes a greater level of detail on the proposed measures, it has more potential to result in a greater number of positive effects on the SEA objectives and is more applicable to the current flooding environment of Westminster, improving the potential for reducing flood risk as a result of the strategy.

4 Cumulative Effects

4.1.1. A cumulative effects assessment was undertaken for the SEA. This looked at two different types of cumulative effects – Intra-project and Inter-project. These are defined as follows:

- Consideration of how different proposed measures and actions within WCC may interact and cause cumulative effects on a receptor (Intra-project effects); and
- How the proposed measures and actions within WCC could cause cumulative effects in association with other plans, policies and projects in the surrounding area (Inter-Projects Effects).

4.2 Intra-Project Effects

4.2.1. The proposed measures and actions within the LFRMS resulted in the following intra-project cumulative effects. Further details on the assessment of the inter-project cumulative effects can be found within **Section 8.2** of the main **SEA Report**.

4.2.2. Positive effects have largely been identified for SEA objectives where policies contribute to improving the resilience and status of the borough, for example, reducing the effects of flooding on human health, improving biodiversity enhancements, and improving flood resilience measures. Positive effects were identified for population and human health, economy, landscape and townscape, water environment, climate change, flood risk, and transport and critical infrastructure.

4.2.3. Mixed positive and negative effects were identified for biodiversity, historic environment and soils. No negative effects or uncertain effects were identified for any of the SEA objectives.

4.3 Inter-Project Effects

4.3.1. An assessment of the potential cumulative effects of the LFRMS in association with other plans, policies and projects in the surrounding area was completed, looking at the potential impacts at a strategic level. Further details on the assessment of the inter-project cumulative effects can be found within **Section 8.3** of the main **SEA Report**.

4.3.2. The following plans were considered:

- Westminster Local Development Scheme 2024-2027;
- Westminster City Plan 2019 – 2040;
- Westminster Climate Change Action Plan 2040;

- The London Plan, 2021; and
- Neighbouring Local Plans and Strategies (detailed within **Section 8.3** of the main **SEA Report**).

4.3.3. Potential positive effects were identified for population and human health, economy, biodiversity, landscape and townscape, historic environment, water environment, climate change, flood risk, transport and critical infrastructure, and soils.

4.3.4. Potential mixed positive and negative effects were identified for biodiversity, landscape and townscape, historic environment, water environment, flood risk, and soils.

5 Mitigation, Enhancements and Monitoring

5.1 Mitigation and Enhancement Measures

5.1.1. Mitigation of significant negative effects of the plan and enhancement of positive effects are a key purpose of SEA. The SEA Regulations require that mitigation measures are considered to prevent, reduce or offset any significant adverse effects on the environment of implementing the plan.

5.1.2. Proposed mitigation and enhancement measures have been set out in **Table 5-1** below.

Table 5-1 – Proposed Mitigation and Enhancement Measures

SEA Objective	Mitigation/ Enhancement	Mechanism
SEA1: Population, equalities and health	Measures should ensure that all groups are reached inclusively and in a timely manner. Consideration should be given to those who may not have access or the knowledge to access the internet and/or a smart phone. Materials should be developed in a non-technical manner so that a wider range of social groups will be able to understand the information.	Within the LFRMS Scheme level Health Impact Assessment (HIA)
SEA1: Population, equalities and health SEA2: Economy	Best practice mitigation measures e.g., noise and air quality management, should be implemented to minimise effects during construction on the local population. Active engagement with the local community should be undertaken prior to the commencement of any construction activities.	Construction Environmental Management Plan (CEMP) Community Engagement Plan Scheme level HIA
SEA1: Population, equalities and health	Support provided to residents should be tailored for specific household types and needs, minimising any inequalities as a result of flood events.	Within the LFRMS Community Engagement Plan
SEA1: Population, equalities and health SEA2: Economy	Resilience and recovery guides should be developed individually to support different types of partners, businesses, and community needs.	Within the LFRMS Community Engagement Plan
SEA1: Population, equalities and health SEA3: Biodiversity	Schemes should incorporate the biodiversity net gain where possible. New developments should present opportunities for new areas of green infrastructure and green space which can be accessed by the local community. Biodiversity targets should exceed mandatory biodiversity net gain of 10% where possible. Biodiversity measures that are implemented should aim to contribute to reducing flood risk where possible, with improved tree planting for drainage measures.	Within the LFRMS Scheme level HIA Scheme level design Project level environmental assessment

SEA Objective	Mitigation/ Enhancement	Mechanism
SEA3: Biodiversity	SuDS design should adhere to guidance set out within the Mayor of London's (in partnership with the London Wildlife Trust) Urban Greening for Biodiversity Net Gain[2].	Scheme level design
SEA3: Biodiversity	Opportunity to work with natural processes to manage flood risk and enhance biodiversity and ecosystem resilience through habitat creation, green engineering and natural management techniques.	Within the LFRMS Scheme level design Project level environmental assessment
SEA3: Biodiversity	Scheme design should aim to minimise the environmental effects by 'designing to avoid' potential habitat features that may be of local importance. Habitat loss should be avoided, but where this can't be avoided, habitats will be reinstated upon completion of construction, and compensatory habitat should be considered to replace damaged or lost habitat.	Scheme level design Project level environmental assessment CEMP Biodiversity Management Plan
SEA4: Landscape & Townscape SEA5: Historic Environment	Measures should incorporate Construction Industry Research and Information Association's (CIRIA) guidance on SuDS[3] design to ensure high-quality design that will minimise the effects on the historic environment	Scheme level design Project level environmental assessment
SEA4: Landscape & Townscape SEA5: Historic Environment	Developments should be well-designed and screened to ensure that their effects on the local townscape, landscape and historic setting are minimised.	Scheme level design Project level environmental assessment
SEA5: Historic Environment	Careful consideration should be given to the potential presence of heritage assets (particularly buried archaeology) when finalising developments. Where required, a programme of trial trenching and archaeological recording should be undertaken.	Archaeological/ heritage surveys CEMP

[2] Mayor of London's (in partnership with the London Wildlife Trust) Urban Greening for Biodiversity Net Gain: A Design Guide. 2021 [online] https://www.london.gov.uk/sites/default/files/urban_greening_and_bng_design_guide_march_2021.pdf
[3] Construction Industry Research and Information Association (2017) Guidance on the construction of SuDS. Available at: https://www.ciria.org/CIRIA/News/CIRIA_news2/CIRIA_publishes_new_guidance_on_SuDS_construction.aspx

SEA Objective	Mitigation/ Enhancement	Mechanism
SEA6: Water Quality	Care should be taken during construction regarding the potential for contaminants such as silt, concrete or fuel oil to pollute water courses via surface run off. All construction activities should be undertaken in accordance with relevant best practice pollution prevention guidance. Pollution Incident Control Management Plans should be developed to limit adverse effects arising from pollution events.	CEMP Pollution Incident Control Management Plan
SEA6: Water Quality	Schemes should be designed and carefully located to try and avoid intrusive works such as piling which could mobilise contaminants. Dependent on the nature of proposed flood risk schemes, natural hydromorphological functions could be impacted, resulting in negative effects.	Scheme level design/ optioneering Project level environmental assessment
SEA7: Climate resilience and energy efficiency	Schemes should incorporate sustainable design measures to reduce overall levels of embodied carbon. The use of renewables for the energy supply during construction and operation will be investigated, as well as the use of materials with lower embodied carbon.	Scheme level design Project level environmental assessment

5.2 Monitoring Measures

5.2.1. The SEA Regulations require that monitoring is undertaken on a plan so that the significant effects of applying the plan can be identified, and remedial action imposed. The purpose of the monitoring is to provide an important measure of the sustainability outcome of the final plan, and to measure the performance of the plan against sustainability objectives and targets. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage sustainability information.

5.2.2. The aim of monitoring is to check whether the plan is having the significant effects that were predicted in the SEA, and to deal with any unforeseen problems. Those remaining significant effects (albeit uncertain effects) that remain following the implementation of the mitigation and enhancement measures above include the following:

- **SEA3 (Biodiversity):** Potential loss of and fragmentation of habitats from the construction of flood defence schemes.
- **SEA4 (Landscape and Townscape):** Potential degradation of the landscape and townscape from the construction of flood defence schemes.
- **SEA5 (Historic Environment):** Potential loss of heritage assets (including archaeological remains) and deterioration of the historic setting from the construction of flood defence schemes.
- **SEA6 (Water Quality):** Potential degradation of groundwater quality.

5.2.3. It should be noted that these uncertain effects are generally where limited scheme information is currently available.

5.2.4. **Table 5-2** below sets out those monitoring measures which could be suitable in monitoring those uncertain residual effects outlined above.

Table 5-2 – Proposed Monitoring Measures

SEA Objective	What could be measured?	Mechanism
SEA3: Biodiversity	The number of new schemes achieving biodiversity net gain.	Scheme level design Annual monitoring

SEA Objective	What could be measured?	Mechanism
SEA4: Landscape and Townscape	Loss or damage to landscape character and features of designated sites. Area of blue and green infrastructure created.	Scheme level design Annual monitoring
SEA5: Historic Environment	Number of developments within a conservation area. Number of historic assets (including buried heritage) lost and/or discovered. Number of heritage assets benefiting from flood protection.	Scheme level design Annual monitoring
SEA6: Water quality	WFD water quality.	Scheme level WFD risk assessment
SEA1: Equalities and Human Health	The number of properties benefiting from flood protection. % increase of green/blue infrastructure.	Scheme level design Annual monitoring
SEA2: Economy and Businesses SEA8: Flood risk SEA9: Critical Infrastructure	The number of properties benefiting from flood protection. The number of businesses benefiting from flood protection.	Annual monitoring

SEA Objective	What could be measured?	Mechanism
	The number of critical infrastructure assets benefiting from flood protection.	
SEA7: Transport and Critical Infrastructure	Number of schemes that make use of existing infrastructure.	Scheme level design
SEA10: Geology and Soils	% of land that is restored and improved.	Annual monitoring

6 Next Steps

6.1.1. In accordance with the SEA Regulations, the SEA Report must be made available at the same time as the draft plan or programme, as an integral part of the consultation process, and the relationship between the documents clearly indicated.

6.1.2. WCC will seek the views of statutory bodies and other stakeholders on the results of the SEA, in order to ensure that the SEA provided a robust assessment of the LFRMS.

6.1.3. Once the LFRMS is adopted, an SEA Statement will be produced to document this process and will include a record of the comments received on both the LFRMS and SEA Environmental Report, and the actions taken as well as setting out how the SEA has influenced the development of LFRMS.

WSP House
70 Chancery Lane
London
WC2A 1AF

wsp.com

WSP UK Limited makes no warranties or guarantees, actual or implied, in relation to this report, or the ultimate commercial, technical, economic, or financial effect on the project to which it relates, and bears no responsibility or liability related to its use other than as set out in the contract under which it was supplied.