

# LOCAL FLOOD RISK MANAGEMENT STRATEGY HABITATS REGULATIONS ASSESSMENT



PREPARED FOR THE LONDON BOROUGH OF BRENT

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## EXECUTIVE SUMMARY

This Habitats Regulations Assessment (HRA) screening report is required in order to recognise the risks and consequences that the London Borough of Brent (Brent) Local Flood Risk Management Strategy (LFRMS) could pose to Natura 2000 sites (designated sites) sites both within and in proximity to Brent. Designated sites are protected under the habitats regulations and include and existing or proposed Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar designated sites. To assess the effect of the LFRMS on the designated sites, each objective of the LFRMS and associated actions will be assessed against each identified site. Any significant negative impacts discovered in this assessment will require the HRA to be progressed past the screening assessment, onto a further stage of the HRA.

There are no designated sites within the Brent borough boundary, however the assessment has been extended to include any sites that may have an ecological or hydrological link to Brent. Two designated sites are close enough to Brent that they have the potential to be ecologically or hydrologically linked to the borough. These sites are Richmond Park (SAC) and Wimbledon Common (SAC).

A screening analysis was undertaken to assess all the LFRMS strategic objectives against each designated site. This screening analysis aimed to identify any potential negative effects on the designated sites as a result of the LFRMS strategic objectives. A negative effect could include a reduction in the air or water quality within the site, a reduction in natural habitats that support the species within the designated site or limiting the potential to maintain or restore these sites in the future.

This screening analysis concluded that none of the LFRMS strategic objectives will have a negative effect on either of the designated sites. Conversely, the strategic objectives have shown to have both direct and indirect positive effects on the designated sites, through providing better protection and improvement to the surrounding habitats. It can therefore be determined that this HRA for the Brent LFRMS does not require progression on to any further HRA stages, and does not require a full HRA.

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## ACRONYMS AND ABBREVIATIONS

Abbreviation	Definition
DEFRA	Department for Environment, Food and Rural Affairs
FWMA	Flood and Water Management Act
HRA	Habitats Regulations Assessment
JNCC	Joint Nature Conservation Committee
LFRMS	Local Flood Risk Management Strategy
LLFA	Lead Local Flood Authority
Ramsar	Ramsar sites are wetlands of international importance designated under the Ramsar Convention (1975)
Brent	The London Borough of Brent
Brent Council	Brent London Borough Council
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SPA	Special Protection Area

# 1 INTRODUCTION

## 1.1 Purpose of screening

The purpose of this Habitats Regulations Assessment (HRA) is to assess the risks and consequences posed by the Local Flood Risk Management Strategy (LFRMS) to Brent habitats and protected areas both within and in proximity to the borough. The screening stage of the assessment, addressed in this report, is used to gather evidence of any potentially harmful impacts on identified protected sites, which may then require progression of the HRA onto a further assessment stage.

An HRA is required under the [Conservation of Habitats and Species \(Amendment\) \(EU Exit\) Regulations 2019](#), also known as the Habitats Regulations. This assessment must be carried out by the authority producing a plan or proposal to determine whether any elements of the plan/proposal are likely to negatively impact any Natura 2000 sites (designated sites). As the LFRMS is considered a plan, an HRA is required. Designated sites are protected under the habitats regulations and include and existing or proposed Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar designated sites. Any areas designated to compensate for impacts to designated sites must also be considered in an HRA.

## 1.2 Methodology

The process of an HRA is defined by guidance produced by the Department for Environment, Food, and Rural Affairs (DEFRA), Natural England, and additional Welsh governing bodies. This guidance outlines a three-stage process, of which this report will cover Stage 1 (screening). The aim of Stage 1 is to identify if any of the proposed objectives or actions in the LFRMS will have any significant effects on protected sites. The HRA will only progress to Stages 2 and 3 if any significant effects are identified in this report. The full process of the HRA is outlined in *Table 1.1* below.

**Table 1.1.1 HRA stages and their purpose**

HRA Stage	Purpose
Stage 1 - Screening	To check if the strategy, plan, or proposal is likely to have significant effect on the site's conservation objectives
Stage 2 – Appropriate Assessment	To assess the likely significant effects of the proposal in more detail and identify ways to avoid or minimise any effects
Stage 3 - Derogation	To decide if a strategy, plan, or proposal that would have a negative effect on a site would qualify for an exemption

This report, along with the Strategic Environmental Assessment (SEA) will be reviewed by Natural England (as the statutory consultee), as well as the Brent LLFA as an internal stakeholder. Following this review, the LFRMS along with the SEA and HRA will undergo a public consultation process, where a variety of different stakeholders will have the opportunity to provide comments on these documents. The feedback from this process will then be reviewed and incorporated accordingly.

More information on Habitats Regulations Assessments can be found [here](#).

### 1.3 HRA consultation questions

It is a requirement of the HRA screening process to consult the statutory consultees and allow other stakeholders to review the outcomes of the consultation. A set of questions have been prepared to facilitate this consultation, and these questions are listed below. Statutory consultees will be asked to respond to these questions prior to the public consultation of this document.

#### Identifying relevant sites

1. Do you feel we have included all of the most relevant designated 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 Consultation Process

This HRA screening report will undergo a consultation process with the statutory consultee, Natural England. Natural England will provide feedback on the questions outlined in Section 1.3, and appropriate changes will be made to this report based on their response. The HRA will then go out for public consultation, and the feedback from this process will be incorporated into the final published HRA and LFRMS.

### 1.5 Local Flood Risk Management Strategy

#### 1.5.1 Summary of LFRMS

Brent was established as the Lead Local Flood Authority (LLFA) under the Flood Water Management Act (2010) (FWMA). As an LLFA, Brent is responsible for managing local flood risks, which includes the development, application, and maintenance of a LFRMS. The LFRMS sets out objectives for how the LLFA and other Risk Management Authorities (RMAs) will manage flood risk in Brent, particularly from surface water, ground water, and ordinary watercourses, for which the LLFA are responsible. Supporting documents of the LFRMS include an action plan, a monitoring and review plan, an SEA, and this HRA.

#### 1.5.2 The strategic objectives of the Brent LFRMS

**Strategic Objective 1:** Improve our knowledge and understanding of the different flood risks in Brent.

**Strategic Objective 2:** Improve clarity on the roles and responsibilities surrounding flooding.

**Strategic Objective 3:** Reduce the risk of flooding to the community in Brent by delivering targeted Flood Alleviation Schemes (FASs) and encouraging the use of sustainable drainage systems (SuDS)

**Strategic Objective 4:** Improve community awareness of flood risk and support successful communication to develop resilience to flooding in Brent.

**Strategic Objective 5:** Maximise sustainability benefits to take a holistic approach to flood management, taking into account the impact of climate change.

**Strategic Objective 6:** Identify funding and resources available to encourage future development within flood risk management in Brent.

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## 2 IDENTIFICATION OF RELEVANT DESIGNATED SITES

### 2.1 Introduction to the designated sites

The initial step of the HRA process is to identify the designated sites that need to be considered in this assessment. A map of the designated sites is included in the Appendix A. A more extensive map of all the designated sites in Great Britain can be viewed on [DEFRA's Magic Map tool](#).

Information regarding the sites has been collated from the following sources:

[Natural England](#)

[Joint Nature Conservation Committee \(JNCC\)](#)

### 2.2 Designated sites within or in proximity to the Brent borough boundary

There are no designated sites within or partially within the Brent Boundary, however there are two designated sites close enough to Brent that they have the potential to be ecologically or hydrologically linked to the borough. These sites may still be affected by the objectives of the LFRMS, and therefore need to be included in this assessment.

**Table 2.1 Designated sites in proximity to Brent**

Designated Site	Conservation Status	Size (Ha)	Distance from Brent
Richmond Park	Special Area of Conservation	847	8 km
Wimbledon Common	Special Area of Conservation	351	9 km

#### 2.2.1 Site 1 – Richmond Park

Richmond Park is located in southwest London, approximately 8km away from the Brent Borough Boundary. The park covers 847 Ha and is one of the largest open spaces in Greater London. The parkland supports a wide variety of habitats, including marshy grassland and wood pasture. Richmond Park is one of four primary sites in England for the stag beetle *Lucanus cervus*, a globally threatened species. Table 2.2 below presents the key information about Richmond Park, including the qualifying species and habitats as well as the current threats and pressures facing them.

**Table 2.2 Richmond Park SAC site information**

Site name	Richmond Park
Site designation	SAC and SSSI
Location detail	Located in southwest London, approximately 8 km from Brent
Site designation	SAC
EU code	UK0030246
Area (ha)	847
Qualifying species and/or habitat features	<ul style="list-style-type: none"> <li>Stag Beetle, <i>Lucanus cervus</i> – S1083</li> </ul>
General site character (% area)	<ul style="list-style-type: none"> <li>Inland water bodies: 1.5%</li> <li>Bogs, marshes, water fringed vegetation, ferns: 0.5%</li> </ul>

	<ul style="list-style-type: none"> <li>• Heath, scrub, maquis and garrigue, phrygana: 25%</li> <li>• Mixed woodland: 5%</li> <li>• Improved grassland: 20%</li> <li>• Broadleaved deciduous woodland: 25%</li> <li>• Humid grassland, mesophile grassland: 5%</li> <li>• Dry grassland, steppes: 18%</li> </ul>
<b>Current condition and threats</b>	<ul style="list-style-type: none"> <li>• No current threats affecting the Natura 2000 features have been identified</li> </ul>
<b>Supplementary evidence</b>	<a href="#">Standard Data Form – UK0030246</a> <a href="#">European Site Conservation Objectives for Richmond Park SAC – UK0030246</a> <a href="#">Site Improvement Plan – Richmond Park (2014)</a>

## 2.2.2 Site 2 - Wimbledon Common

Wimbledon Common is located in south-west London, approximately 9km from the Brent borough boundary. The site has an area of 351 Ha and is one of the largest areas of uncultivated land in Greater London. It is made up of several types of habitats, including broadleaved deciduous woodland, dry grassland, and dry and wet heath. This site is of particular importance to the stag beetle *Lucanus cervus*, a globally threatened species. It also supports small areas of heathland, a very scarce habitat in London. Table 2.3 below presents the key information about Wimbledon Common, including the qualifying species and habitats as well as the current threats and pressures facing them.

**Table 2.3 Wimbledon Common SAC site information**

<b>Site name</b>	Wimbledon Common
<b>Site designation</b>	SAC
<b>Location detail</b>	Located in southwest London, approximately 9 km from Brent
<b>Site Designation</b>	SAC
<b>EU code</b>	UK0030301
<b>Area (ha)</b>	351
<b>Qualifying species and/or habitat features</b>	<ul style="list-style-type: none"> <li>• Stag Beetle, <i>Lucanus cervus</i> – S1083</li> <li>• European dry heaths – H4030</li> <li>• North Atlantic wet heaths with <i>Erica tetralix</i> – H4010</li> </ul>
<b>General site character (% area)</b>	<ul style="list-style-type: none"> <li>• Bogs, marshes, water fringed vegetation, ferns: 0.5%</li> <li>• Heath, scrub, maquis and garrigue, phrygana: 5%</li> <li>• Dry grassland, steppes: 45%</li> <li>• Inland water bodies: 1%</li> <li>• Improved grassland: 3.5%</li> <li>• Broadleaved deciduous woodland: 45%</li> </ul>

<b>Current condition and threats</b>	<ul style="list-style-type: none"> <li>• Forest and plantation management and use</li> <li>• Air pollution, air-borne pollutants</li> <li>• Invasive non-native species</li> <li>• Public access/disturbance</li> <li>• Habitat fragmentation</li> </ul>
<b>Supplementary evidence</b>	<p><a href="#">Standard Data Form – UK0030301</a></p> <p><a href="#">European Site Conservation Objectives for Wimbledon Common SAC – UK0030246</a></p> <p><a href="#">Site Improvement Plan – Wimbledon Common (2014)</a></p>

### 2.3 Identified relevant sites consultation questions

1. Do you feel we have included all of the most relevant designated 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?

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# 3 SCREENING ANALYSIS

## 3.1 Screening analysis summary

The screening analysis will assess the effect of the proposed strategic objectives of the LFRMS on each of the designated sites, which were identified in *Section 2.2*. Each designated site will be assessed against the LFRMS strategic objectives, and it will then be determined whether the strategic objective will cause a positive, negative, or no effect on the designated site. The results of this screening analysis will then determine whether progression onto a further stage of assessment is required.

## 3.2 Screening analysis

Each LFRMS strategic objective has been analysed against the designated sites identified in *Section 2.2*, to assess whether these objectives could cause a harmful effect on the site. A harmful effect could be a disruption to the natural processes within the site, a reduction in the quality or area of designated habitats and/or species, or a limitation on future restoration of the site. *Table 3.1* below displays the results of the screening analysis, with the criteria shown in *Table 3.2*. *Section 3.3* provides a detailed description of how these decisions were reached regarding each strategic objective. As seen below, none of the LFRMS strategic objectives will have an affect on the designated sites that are in proximity to the London borough of Brent.

**Table 3.1 Scoring matrix of LFRMS objectives against HRA outcome criteria**

		HRA Site	
		Richmond Park	Wimbledon Common
LFRMS Strategy Objective	A	0	0
	B	0	0
	C	0	0
	D	0	0
	E	0	0
	F	0	0

**Table 3.2 Legend of HRA outcome criteria for Table 3.1**

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

### 3.3 Screening analysis outcomes

#### 3.3.1 LFRMS Strategic Objective A: Improve our knowledge and understanding of the different flood risks in Brent.

This strategic objective is unlikely to have any negative impact on the identified designated sites. Improved knowledge and understanding of flood risks within Brent is likely to aid in the protection of these designated sites, through better protection of, and potentially ecological benefit for, these sensitive habitats. Therefore, this LFRMS objective has been screened out at this stage of the HRA.

#### 3.3.2 LFRMS Strategic Objective B: Improve clarity on the roles and responsibilities surrounding flooding.

This strategic objective is unlikely to have any negative impact on the identified designated sites. Improving clarity around the roles and responsibilities surrounding flooding will aid in reducing the impact of flooding within Brent. This will potentially have a positive impact on the designated sites, due to increased habitat protection and conservation. Therefore, this LFRMS objective has been screened out at this stage of the HRA.

#### 3.3.3 LFRMS Strategic Objective C: Reduce the risk of flooding to the community in Brent by delivering targeted Flood Alleviation Schemes (FASs) and encouraging the use of sustainable drainage systems (SuDS).

This strategic objective is unlikely to have any negative impact on the identified designated sites. Introducing more FASs and SuDS into Brent will help reduce the flood risk within the borough, while also future proofing Brent for the impacts of climate change. The identified designated sites are likely to benefit from the more sustainable engineering approaches used, through reduced emissions and habitat loss due to flooding. An increase SuDS throughout Brent will lead to an increase in ecological and biodiversity outcomes, which is likely to benefit the designated sites. Therefore, this LFRMS objective has been screened out at this stage of the HRA.

#### 3.3.4 LFRMS Strategic Objective D: Improve community awareness of flood risk and support successful communication to develop resilience to flooding in Brent.

This strategic objective is unlikely to have any negative impact on the identified designated sites. Educating the residents of Brent on flood risk and flood resilience will help protect their own properties and may also encourage them to engage with their nearby designated site to aid in flood alleviation projects there. Therefore, this LFRMS objective has been screened out at this stage of the HRA.

#### 3.3.5 LFRMS Strategic Objective E: Maximise sustainability benefits to take a holistic approach to flood management, taking into account the impact of climate change.

This strategic objective is unlikely to have any negative impact on the identified designated sites. Through a holistic, climate change focussed approach to flood management, Brent will also benefit from biodiversity gains throughout the borough. This is likely to have a positive affect on the identified designated sites. Therefore, this LFRMS objective has been screened out at this stage of the HRA.

### 3.3.6 LFRMS Strategic Objective F: Identify funding and resources available to encourage future development within flood risk management in Brent.

This strategic objective is unlikely to have any negative impact on the identified designated sites. The identification of available funding resources can enable more efficient and affective flood management both within Brent and within the designated sites. Collaboration between Brent and environmental organisations such as Natural England can lead to benefits for both the designated sites and Brent. Therefore, this LFRMS objective has been screened out at this stage of the HRA.

## 3.4 Screening analysis consultation questions

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.

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## 4 CONCLUSIONS AND NEXT STEPS

### 4.1 Conclusions

The results of the screening analysis indicate that the proposed LFRMS objectives will have no negative effects on the identified designated sites. Several of the objectives are likely to provide some benefit to these sites, through increased habitat enhancement and protection. Therefore, it can be concluded that the HRA for the Brent LFRMS does not need to progress into any further assessment stages and will not require a full HRA.

### 4.2 Consultation of the HRA

Statutory consultation for this HRA Screening Report will take place on **DATE**. This will require the statutory consultee, Natural England, and any other relevant stakeholders to provide feedback on the questions outlined in *Section 1.3*. The HRA will then go out for public consultation, and the feedback from this process will be incorporated into the final published HRA and LFRMS.

### 4.3 Further Consultation Questions

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

# APPENDIX A – DESIGNATED SITES MAP

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