

Habitat Regulations Assessment Screening Report

Prepared for

Royal Borough of Greenwich

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Executive Summary

The purpose of the Habitats Regulations Assessment (HRA) Screening Report is to assess whether the Royal Borough of Greenwich's Local Flood Risk Management Strategy (LFRMS) could pose potential risks or adverse effects to sites protected under the Conservation of Habitats and Species Regulations 2017 (commonly known as the Habitats Regulations). These protected areas, collectively known as Natura 2000 sites, include existing or proposed Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar sites.

As part of the HRA screening process, the strategic objectives and any associated actions within the LFRMS have been assessed for their potential to impact Natura 2000 sites. This screening determines whether further stages of HRA are required.

Although there are no Natura 2000 sites located within the administrative boundary of the Royal Borough of Greenwich, sites located in proximity to the borough must also be considered, as they may share connections between their natural ecosystems. Two such sites have been identified within a 10km radius of the borough boundary:

- Lee Valley (SPA and Ramsar site)
- Epping Forest (SAC)

A comprehensive screening analysis was undertaken to examine each LFRMS strategic objective against the conservation objectives of the identified Natura 2000 sites. Potential harmful effects considered include:

- Disruption to natural processes that support the ecological integrity of the sites.
- Reduction in the area, quality, or condition of designated habitats or species.
- Limitations on the potential for habitat or species restoration.

Following this analysis, it has been concluded that none of the LFRMS strategic objectives are likely to have a significant negative effect on the identified Natura 2000 sites. On the contrary, several objectives are anticipated to have positive or supportive effects to the sites, either directly or indirectly through enhancing their quality or offering further protection. As a result, it is determined that the HRA does not need to proceed to the appropriate assessment stage, and therefore, a full HRA is not required for the current version of the LFRMS.

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Acronyms and Abbreviations

Table 1-1: Acronyms and abbreviations

Abbreviation	Definition
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
FWMA	Flood and Water Management Act 2010
HRA	Habitats Regulations Assessment
LFRMS	Local Flood Risk Management Strategy
LLFA	Lead Local Flood Authority
Natura 2000 sites	Also known as European sites, a network of core breeding and resting sites for rare and threatened species, and some rare natural habitat which are protected in their own right
Ramsar	Ramsar Sites are wetlands of international importance designated under the Ramsar Convention
RMA	Risk Management Authority
SAC	Special Area of Conservation
SEA	Strategic Environment Assessment
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

1. Introduction

1.1 Purpose of Screening

1.1.1 Legislative basis

A Habitats Regulations Assessment (HRA) is required under the Conservation of Habitats and Species (Amendment) Regulations (2019) and the EU "Habitats Directive"1992, known as the Habitats Regulations. The purpose of this HRA is to evaluate the risks posed by actions in the Local Flood Risk Management Strategy (LFRMS) to habitats and protected areas.

EU 'Habitats Directive' 1992

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives." Article 6 (3)

Conservation of Habitats and Species Regulations 2010 (as amended)

"A competent authority, before deciding to … give any consent for a plan or project which 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) … must make an appropriate assessment of the implications for the site in view of that site's conservation objectives … The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site …".

These sites include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), collectively referred to as European Sites or Natura 2000 Sites. In addition to this any proposed SACs, SPAs, both active and proposed Ramsar Sites (wetlands of international importance), and any areas secured as sites compensating for damage to a European site also require consideration in an HRA. The assessment is carried out in accordance with the requirements of the Conservation of Habitats and Species Regulations (2017), known as the Habitats Regulations. The purpose of the HRA is to ensure the integrity of these protected sites is maintained and that the impact of development will not have an adverse effect.

1.1.2 Scope of HRA

The scope of the HRA includes all European sites within the Royal Borough of Greenwich (RBG), and additionally any European sites outside the borough which could potentially be impacted by measures or policies within the Local Flood Risk Management Strategy (LFRMS).

This report follows a staged approach, beginning with a screening assessment to determine whether significant effects are likely. The screening stage of a

HRA aims to gather evidence of any significant or likely negative effect, which may then require progression on to the appropriate assessment phase. If required, an Appropriate Assessment will be undertaken to consider potential impacts in more detail and, if necessary, mitigation measures.

1.2 Methodology

A full HRA Assessment involves a three-stage process.

- Task 1 involves the identification of any potential significant effects,
- Task 2 assesses ways to mitigate any significant effects identified
- Task 3 considers any exemptions.

These stages are defined by guidance produced by the Department for Environment, Food and Rural Affairs (DEFRA), Natural England, and additional Welsh governing bodies.

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

1.3 HRA Consultation Questions

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

Identifying relevant sites

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

2. Do you feel we have included all the relevant information for each of these sites?

Screening analysis

3. Do you have any comments on the method for the assessment of the HRA sites against the Local Flood Risk Management Strategy strategic objectives?

4. Do you agree with the screening analysis for each of the objectives? If not, please give reasons as to why you would screen a certain objective differently.

Conclusions and further comments

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

6. Do you have any additional comments or suggestions for this HRA Screening Report?

1.4 Local Flood Risk Management Strategy (LFRMS)

1.4.1 LFRMS Summary

Under the FWMA (2010), Greenwich has the role of Lead Local Flood Authority (LLFA) and is responsible for managing local flood risk within the borough. As LLFA, Greenwich are required to produce and maintain the Local Flood Risk Management Strategy (LFRMS) which is updated every 6 years. The purpose of the LFRMS is to outline how the LLFA and other stakeholders will manage flood risk in the borough, including flooding from sources such as surface water, groundwater and ordinary watercourses. The LFRMS sets out the aims and objectives in managing local flood risk within RBG.

1.4.2 Local Area Information

The Royal Borough of Greenwich is located in south-east London and shares boundaries with several neighbouring boroughs including Newham, Tower Hamlets, and Barking and Dagenham to the north, across the River Thames. Bexley to the east, Bromley to the South and Lewisham to the south and west. The River Thames forms the boroughs northern boundary and plays a significant role in shaping its flood risk and drainage characteristics.

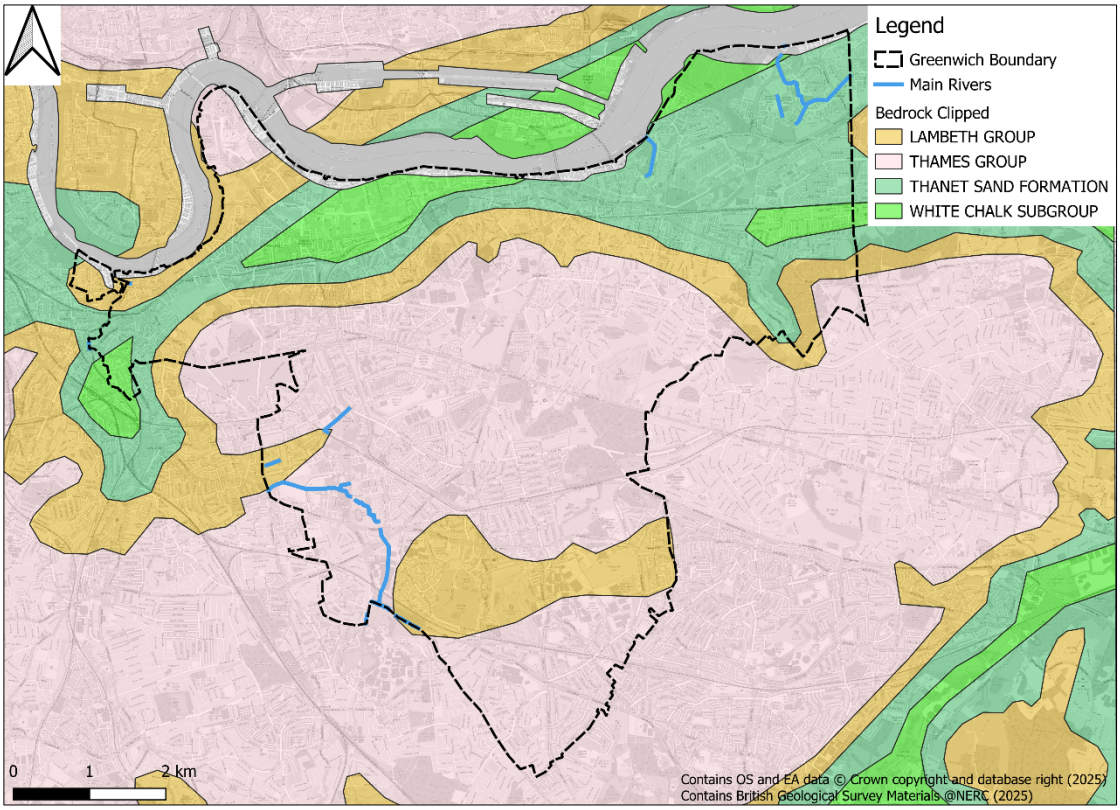


Figure 1: Map of Greenwich Geology and Watercourses

RBG is traversed by several watercourses and culverted streams that flow into the Thames. Notably, the River Quaggy, which flows through the Kidbrooke area before discharging into the Thames. The borough's varied topography, urban development, and underlying geology contribute to areas of surface water flood risk, which are managed by the Lead Local Flood Authority (LLFA).

1.4.3 LFRMS Strategic Objectives

A list of RBG's five LFRMS Strategic Objectives can be found below. They will later be assessed in Section 3 against each of the Natura 2000 sites identified. This will help to distinguish whether the objectives and their associated actions would have an effect on the sites.

The five objectives of the LFRMS are:

A. Improve knowledge and understanding of flood risk within Greenwich.

B. Maximise sustainability and biodiversity benefits to Greenwich by taking a holistic approach to flood risk management through the use of natural flood management (NFM).

C. Reduce the risk of flooding to the community in Greenwich by delivering targeted flood alleviation schemes (FASs) and encouraging the use of sustainable drainage systems (SuDS).

D. Investigate new funding opportunities available to develop flood risk management within Greenwich.

E. Improve community awareness and preparedness of flood risk within the borough.

1.5 Consultation Process

This HRA Screening Report has been prepared in accordance with the Conservation of Habitats and Species Regulations (2017), which require authorities to assess whether a plan or project is likely to have a significant effect on a European site, either alone or in combination with other plans or projects.

As a statutory strategy related to water and flood risk management, RBG's LFRMS must be screened to determine whether it is likely to have significant effects on any Natura 2000 or European-designated sites, such as Special Areas of Conservation (SACs), Special Protection Areas (SPAs), or Ramsar sites.

This HRA Screening Report must be reviewed by the statutory environmental consultees in England: Natural England, the Environment Agency, and Historic England. As part of this review process, specific consultation questions were included at the end of each relevant section of the report to gather targeted feedback. Responses received from these consultees were considered and used to inform an updated version of the Screening Report.

Following the statutory consultation, a public consultation was held between 23/03/2026 to 04/05/2026. During this period, members of the public, internal stakeholders, and external organisations were invited to comment on the report. All relevant feedback has been reviewed, and suggested amendments have been incorporated into the final version of the HRA Screening Report where appropriate. Six HRA-specific consultation questions were posed to the statutory consultees. These are listed in Section 1.3 and referenced throughout the relevant sections of this report.

2. Identification of Relevant Sites

2.1 Introduction to the sites

The first stage of the HRA screening process is to identify any Natura 2000 sites within or near RBG. This ensures potential effects of the LFRMS Strategic Objectives on nearby Natura 2000 sites are considered. Site data is sourced from Natural England.

2.2 Sites within the Royal Borough of Greenwich

The first step in the HRA Screening process is to identify any Natura 2000 sites within the borough. While there are no Natura 2000 sites located directly within RBG, two sites lie nearby and are described in the following section. It is important to consider any sites in close proximity to the borough that may have ecological connections with its natural ecosystems. These particular sites were selected because they are situated within 10 km of RBG boundary.

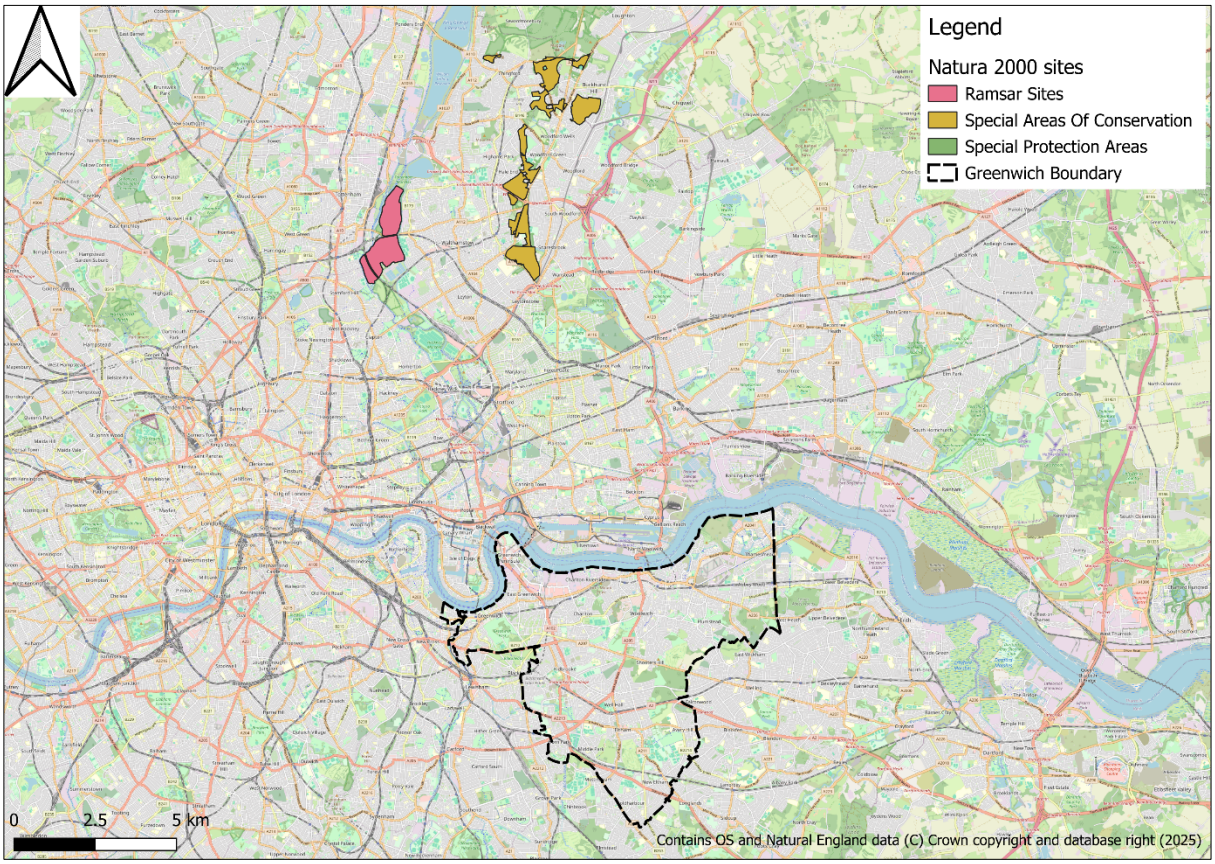


Figure 2 Map of the Natura 2000 Sites in Proximity to RBG

2.3 Sites in proximity to the Royal Borough of Greenwich

Table 2-1: Lee Valley Summary

Site name	Lee Valley
Site designation	SPA and Ramsar
EU code	UK9012111
Area (Ha)	448
Qualifying species and/or habitat features	**SPA** • Bittern, *Botaurus stellaris* - A021, nb • Gadwall, *Anas strepera* - A051, nb • Shoveler, *Anas clypeata* - A056, nb **Ramsar** • Gadwall, *Anas strepera* - Wintering • Shoveler, *Anas clypeata* - Wintering • Water boatman, *Micronecta minutissima* • Whorled water-milfoil, *Myriophyllum verticillatum*
General site character	• Bogs, Marshes, Water fringed vegetation, Fen (4%) • Other land (including Towns, Villages, Roads, Waste places, Mines, Industrial sites) (1%) • Inland water bodies (Standing water, Running wate (67%) • Humid grassland, Mesophile grassland (8%) • Improved grassland (10%) • Broad-leaved deciduous woodland (10%)
Current pressure and/or threats	• Water pollution, affecting A021, A051 and A056 • Hydrological changes, affecting A021, A051 and A056 • Public access / disturbance, affecting A021, A051 and A056 • Inappropriate scrub control, affecting A021, A051 and A056 • Fisheries: fish stock, affecting A021, A051 and A056 • Invasive species, affecting A021, A051 and A056 • Inappropriate cutting / mowing, affecting A021 • Air pollution (impact of atmospheric nitrogen deposition), affecting A021
Supplementary evidence	Standard Data Form - UK9012111 Site Improvement Plan – Lee Valley

Table 2-2: Epping Forest Summary

Site name	Epping Forest

Site designation	SAC
EU code	UK0012720
Area (ha)	1630.74
Qualifying species and/or habitat features	• H4010 Northern Atlantic wet heaths with Erica tetralix • H4030 European dry heaths • H9120 Atlantic acidophilous beech forests with Ilex • S1083 Stag beetle, *Lucanus cervus*
General site character	• Inland water bodies (Standing water, Running water) (6%) • Bogs, Marshes, Water fringed vegetation, Fens (0.2%) • Heath, Scrub, Maquis and Garrigue, Phygrana (3.8%) • Dry grassland, Steppes (20%) • Broad-leaved deciduous woodland (70%)
Current pressure and/or threats	• Air pollution (impact of atmospheric nitrogen deposition), affecting H4010, H4030 and H9120 • Under grazing, affecting H4010 and H4030 • Public access / disturbance, affecting H4010, H4030 and H9120 • Changes in species distributions, affecting H9120 • Inappropriate water levels, affecting H4010 • Water pollution, affecting H4010 • Invasive species, affecting H4010 and H9120 • Disease, affecting H9120
Supplementary evidence	Epping Forest - SAC Site Improvement Plan – Epping Forest

2.4 Classified Site Consultation Questions

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

3. Screening Analysis

3.1 Screening Analysis Summary

The screening analysis will assess each of the proposed LFRMS strategic objectives in relation to the sites near RBG, as identified in Section 2.3. An adverse effect may be considered likely if any of the following occur:

- Disruption to natural processes that support the site's designated features.
- Reduction in the extent or quality of designated habitats or species.
- Limitation of future potential to restore designated habitats or species.

Section 3.3 will then present evidence to support the screening judgments, ultimately determining whether each objective can be excluded from further assessment under the Habitats Regulations Assessment (HRA) process.

3.2 Screening Analysis

Table 3-1 summarises the outcomes of the screening for each strategic objective against the relevant sites. The criteria used in this assessment are detailed in Table 3.2. Based on this analysis, none of the LFRMS strategic objectives are anticipated to have any effect on the two Natura 2000 sites located near RBG.

Table 3-1: Scoring Matrix for Table 3-2

Symbol	Meaning
++	Major positive effect on HRA Site.
+	Minor positive effect on HRA Site.
0	Neutral effect on HRA Site and/or dependent on implementation.
-	Minor negative effect on HRA Site.
- -	Major negative effect on HRA Site
?	Uncertain.

Table 3-2: Scoring matrix of LFRMS strategy objectives against HRA outcome criteria

		HRA Site	
		Lee Valley	Epping Forest
LFRMS Strategy Objective	A	**+**	**+**
	B	**+**	**+**
	C	**+**	**+**
	D	**0**	**0**
	E	**+**	**+**

3.3 Screening Analysis Outcome

3.3.1 LFRMS Strategic Objective A: Improve knowledge and understanding of flood risk within Greenwich.

LFRMS Strategic Objective A is unlikely to have any negative effects on the European Sites. The objective's focus is to improve the knowledge and understanding of the different risks of flooding to Greenwich borough. The improved understanding and knowledge of flood risk may help avoid unintended hydrological changes or pollution pathways that could degrade the Natura 2000 sites. It could also support better water management and avoid stress on water dependent habitats. Consequently, the LFRMS strategy's objective A can be screened out at this stage of the HRA.

3.3.2 LFRMS Strategic Objective B: Maximise sustainability and biodiversity benefits to Greenwich by taking a holistic approach to flood risk management through the use of natural flood management (NFM).

LFRMS Strategic Objective B is unlikely to have any negative impacts on the European sites. The objective's aim is to proactively encourage sustainable solutions for local flood risk management which also account for climate change. Through more sustainable solutions to managing local flood risk management, the local Natura 2000 sites are likely to benefit from less emission heavy, hard engineering flood management approaches. Furthermore, through taking climate change into consideration, it is more likely that local flood risk management in Greenwich will remain sustainable in the future and minimise the potential for future flood related impacts to European sites. Therefore, this LFRMS strategic 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 Greenwich by delivering targeted flood alleviation schemes (FASs) and encouraging the use of sustainable drainage systems (SuDS).

LFRMS Strategic Objective C is unlikely to have any negative effects on the European Sites identified. The objective focuses on delivering targeted flood alleviation schemes and promoting sustainable drainage systems (SuDS) to reduce flood risk within RBG. While the implementation of physical infrastructure has the potential to affect nearby habitats, the emphasis on sustainable and targeted interventions, such as SuDS, suggests a low likelihood of adverse effects on the integrity of nearby Natura 2000 sites. SuDS approaches, including permeable surfaces, rain gardens, and swales, can also support water quality improvements and natural hydrological processes, which may provide indirect benefits to water-dependent designated features. Provided these interventions are appropriately located and designed in line with best environmental practice, no likely significant effects are anticipated. As such, LFRMS Strategic Objective C can be screened out at this stage of the HRA**.**

3.3.4 LFRMS Strategic Objective D: Investigate new funding opportunities available to develop flood risk management within Greenwich.

This strategic objective is administrative in nature and does not involve any physical works or changes to land use. Its purpose is to identify and secure funding for future flood risk management measures within the borough. As this objective does not directly or indirectly interact with any environmental receptors, including European Sites, it is considered to have no effect on site integrity, either alone or in combination with other plans or projects. Therefore, LFRMS Strategic Objective D is screened out at this stage of the HRA.

3.3.5 LFRMS Strategic Objective E: Improve community awareness and preparedness of flood risk within the borough.

LFRMS Strategic Objective E seeks to increase public awareness of flooding and empower communities to take appropriate action to reduce risk. This includes outreach, education campaigns, and the dissemination of flood preparedness resources. This objective does not involve any physical interventions or policy changes that could affect the condition or functioning of European Sites. While improved awareness could lead to better environmental stewardship over time, any such benefits would be indirect**.** As such, the objective is considered to have a positive effect on the identified Natura 2000 sites and can be 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

4. Conclusions and Next Steps

4.1 Conclusions

Following the screening analysis section of the HRA, it is evident that none of the proposed LFRMS Strategic Objectives will impose negative effects to the identified Natura 2000 sites. In contrast, the strategic objectives have been shown to have both direct and indirect benefits to the European sites, either through enhancing or offering further protection to the Natura 2000 sites. Therefore, it has been concluded that the HRA for the LFRMS does not require progression onto any further appropriate assessment stages and will not require a full HRA.

The LFRMS will be subject to an internal review on an annual basis, and a comprehensive public review every six years. As part of this review process an updated HRA screening will be carried out. Should any potential negative environmental impacts be identified in future updates of the LFRMS, a full HRA will be undertaken, and alternative measures will be proposed to mitigate any such impacts.

4.2 Final Consultation Questions:

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?