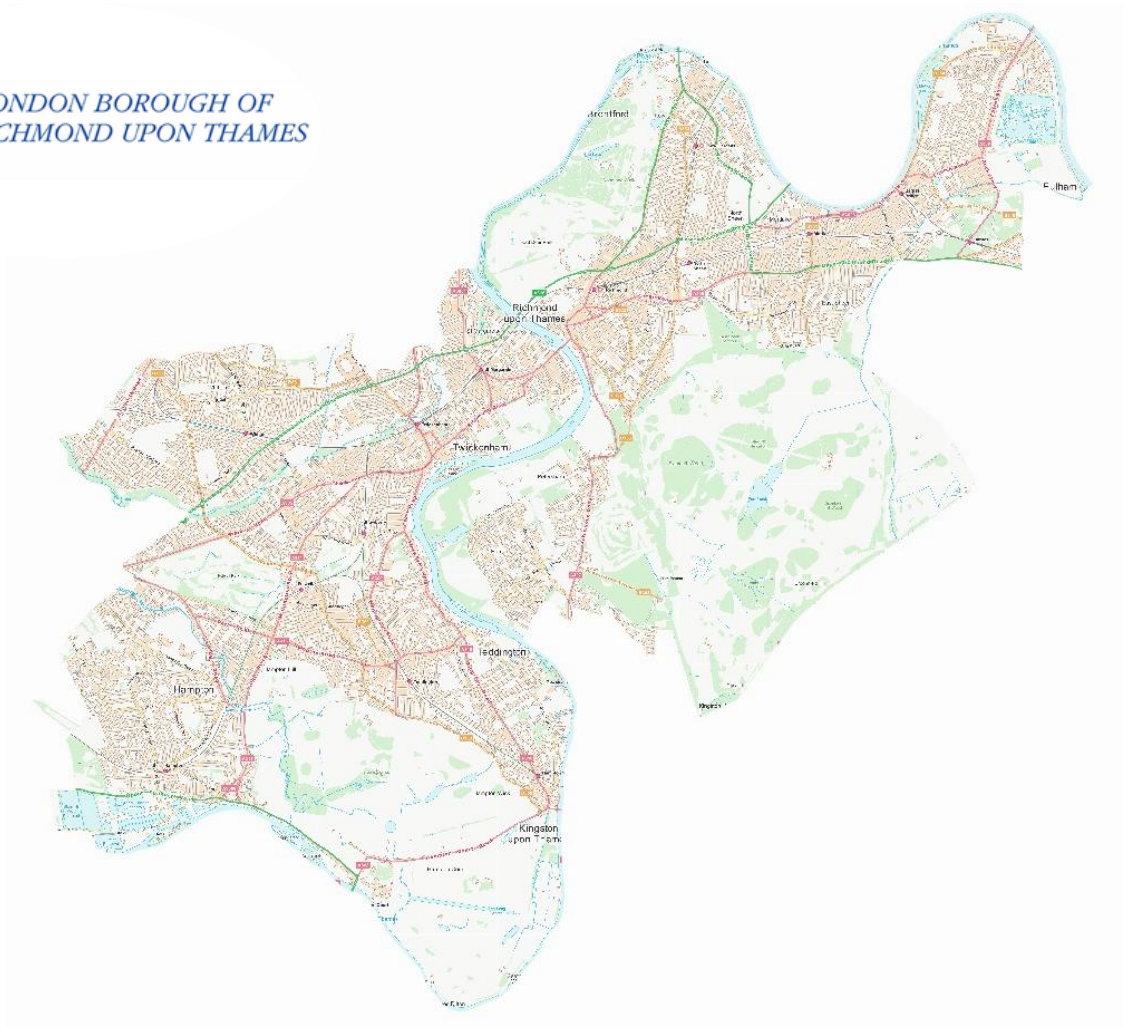
Strategic Environmental Assessment Screening Report

Prepared for the London Borough of Richmond upon Thames



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EXECUTIVE SUMMARY

The purpose of a Strategic Environmental Assessment (SEA) is to evaluate whether a plan or programme will pose any significant environmental impacts through its implementation and delivery. The SEA process contains five stages this Screening Report being the product of Stage A, the 'screening assessment'. The objective of this Screening Report is to identify and understand potential environmental impacts of the outcome of the objectives and associated actions presented in the Local Flood Risk Management Strategy (LFRMS) and its Action Plan. Through this screening process an informed decision on whether the LFRMS requires progression onto later stages of the SEA process can be determined.

The baseline information for this SEA Screening Report reviewed environmental, social and economic factors for the following indicators:

1. Biodiversity, flora and fauna
2. Infrastructure assets
3. Population
4. Public health
5. Air quality
6. Climate factors
7. Soil and water
8. Historic and cultural environments

These indicators have revealed a number of factors affecting the London Borough of Richmond upon Thames (Richmond) which may then have potential impacts for the delivery of the Richmond borough's flood risk management. The Richmond borough's population growth is expected to increase which is likely to encourage an increase in the development of infrastructure and the potential change in land use that is associated. Development is also likely to cause pressures to the many open areas of land in the borough that are classified for conservation purposes. The largest estimated population increase is set to be in the 80+ years age bracket which could cause a rise in elderly dependency within the Richmond borough. Air quality is also a strong concern in the Richmond borough and is also a high priority for improvement across the whole of London due to high levels of air pollution. There are also issues relating to water quality as all three of the Richmond borough's Water Framework Directive (WFD) waterbodies do not currently meet good ecological status. Finally, the impacts from climate change, which link with many of these other issues, is set to increase in the future putting additional pressure on infrastructure, resources and health.

Based on the issues raised the following SEA objectives have been created:

- **SEA 1:** To increase support for sites of natural importance to improve and enhance biodiversity quality, providing biodiversity net gain where feasible.
- **SEA 2:** To support policy to prevent damage and loss of priority habitats and species, including the control and eradication of non-native invasive species.
- **SEA 3:** To increase the resilience of local infrastructure, including transport networks, to the effects of climate change and from flood risk.
- **SEA 4:** To effectively manage the development of infrastructure to support a predicted population increase.
- **SEA 5:** To make efforts in improving air quality by encouraging green corridors through the borough and by supporting lifestyle changes to more environmentally friendly travel options.

- **SEA 6:** To aim for good ecology potential for water quality and secure water resources for the future, improving the WFD status of waterbodies to conserve and enhance the ecological value of rivers and wetlands.
- **SEA 7:** To conserve and enhance heritage assets and their settings particularly those at risk from neglect, decay or development pressures where flood risk or changes to the water table are a risk.

The screening analysis of the SEA objectives against the LFRMS strategic objectives indicates that the LFRMS and its associated actions are not likely to have any negative impact on the SEA issues identified in this Screening Report. The results show that there is a predicted neutral or positive impact of the LFRMS strategic objectives on the SEA objectives. The LFRMS has suitably considered the delivery of its actions regarding local environmental issues and no negative impact is predicted, suggesting that the LFRMS does not require progression onto the advanced stages of the SEA process.

CONTENTS

FIGURES AND TABLES

ACRONYMS AND ABBREVIATIONS

Abbreviation	Definition
EA	Environment Agency
FWMA	Flood and Water Management Act (2010)
HRA	Habitats Regulations Assessment
JSNA	Joint Strategic Needs Assessment
LFRMS	Local Flood Risk Management Strategy
LLFA	Lead Local Flood Authority
LNR	Local Nature Reserve
NO_2	Nitrogen Dioxide
PM10	Particles less than ten microns
Richmond	London Borough of Richmond upon Thames
Richmond borough	The administrative area known as Richmond
Richmond Council	The administrative body of people formally constituted for Richmond
Richmond town centre	The specific geographical area of Richmond town, not referring to the Richmond borough
RMA	Risk Management Authority
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SSSI	Sites of Special Scientific Interest
Statutory Consultees	Environment Agency, Natural England, and Historic England
Wandsworth	London Borough of Wandsworth
WWT	Wildfowl and Wetlands Trust

1 INTRODUCTION

1.1 Purpose of screening

The purpose of a Strategic Environmental Assessment (SEA) is to review actions, plans and strategies which are likely to pose significant environmental effects to a specified area. The European SEA Directive (2001) requires a SEA to include the evaluation of any prospective environmental issues which have the potential to occur when the proposed actions are implemented. An SEA has the function to review these tasks and consider if sufficient alternatives could be put in place to manage or mitigate any significant impact on the local or wider environment, including economic, environmental, and social factors.

The aim of this SEA 'screening assessment' is to clearly identify and understand the risks or implications to the environment based on the Local Flood Risk Management Strategy (LFRMS). This will be achieved by assessing each of the LFRMS strategic objectives in addition to their accompanying actions within the LFRMS Action Plan. By first identifying these environmental vulnerabilities to the London Borough of Richmond upon Thames (Richmond), a determination can be made as to whether the LFRMS requires progression to the appropriate assessment stage of the SEA process.

1.2 Methodology

There are five stages to a SEA which each have their own various tasks to meet the objective of each stage, a summary of this is presented in *Table 1-1*. The output of Stage A is this Screening Report. Progression onto the later stages of an SEA is only required if potentially significant impacts on the environment are found. The tasks within Stage B collate the relevant details in preparation for the Environmental Report which is drafted in Stage C. This report, alongside the plan/programme/strategy it is assessing, has been assessed by statutory consultees during Spring/Summer 2022. The following tasks in Stage E were then undertaken by assessing the reviews and outcomes from the consultation.

Table 1-1 Summary table of stages in a SEA

	SEA Stages	SEA Tasks
Screening Stage	**Stage A:** Setting the context and objectives, establishing the baseline and deciding on the scope.	A1: Identifying other relevant policies, plans and programmes and environmental protection objectives.
		A2: Collecting baseline information.
		A3: Identifying environmental issues and risks.
		A4: Developing the SEA objectives and framework.
		A5: Consulting on the scope of the SEA.
Appropriate Assessment Stages	**Stage B:** Developing and refining options and assessing affects.	B1: Testing the plan objectives against SEA objectives.
		B2: Developing strategic alternatives.
		B3: Predicting the effects of the plan, including alternatives.
		B4: Evaluating the effects of the plan, including alternatives.
		B5: Mitigating adverse effects.
		B6: Proposing measures to monitor the remaining environmental effects of implementing the plan.
	Stage C: Preparing the environmental report.	C1: Preparing the Environmental Report.

	SEA Stages	SEA Tasks
	Stage D: Consulting on the draft strategy and the SEA report.	D1: Consulting on the draft strategy and environmental report with the public and consultation bodies.
		D2: Assessing significant changes.
		D3: Making decisions and providing information.
	Stage E: Monitoring the significant effects of implementing the strategy.	E1: Developing aims and methods for monitoring.
		E2: Responding to adverse effects.

1.3 SEA consultation questions

To fulfil the obligations of this SEA Screening Report a number of questions directed at statutory consultation bodies are outlined in *Section 1.5*. These statutory consultation bodies have responded to these consultation questions during an earlier consultation phase of this document. Each set of questions conform to the corresponding task within Stage A of the SEA methodology, below is a full list of the consultation questions for completeness.

Task A1: Legislation, plans and policies

1. Do you feel we have included all relevant policies, documents, plans and legislation that relate to or could affect the Local Flood Risk Management Strategy?
2. If not, which additional documentation do you think should be included?

Task A2: Baseline data

3. Do you agree that the baseline data we have included is appropriate to the Local Flood Risk Management Strategy that is being developed? If no, please provide reason(s).
4. Do you have, or know of, any additional baseline indicators or data that should be added into this SEA Screening Report? Please provide any appropriate links and/or documents.
5. As far as you are aware, is the baseline data correct? If no, please provide any appropriate links and/or documents with correct data.

Task A3: Environmental issues affecting the borough

6. Do you agree that these are the main environmental issues relating to the Local Flood Risk Management Strategy affecting the Richmond borough? If no, what are the main issues you believe should be included?
7. Are there any other environmental issues that you believe should be added into this SEA Screening Report? If so, please give details.
8. Do you consider any of these environmental issues to not affect the Richmond borough? If so, please give details.

Task A4: Proposed SEA objectives

9. Do you agree that these proposed SEA objectives are suitable in the context of the Richmond borough?
10. Are there any other SEA objectives that you believe should be included? If so, please give details.

Task A5: Screening analysis

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

Conclusions and further comments

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

1.4 Local Flood Risk Management Strategy

1.4.1 LFRMS summary

Under the Flood and Water Management Act (FWMA) (2010) Richmond Council is the appointed Lead Local Flood Authority (LLFA) for the Richmond borough. This same legislation establishes the statutory duties a LLFA must fulfil which includes the delivery of an updated LFRMS every six years, or when changes in legislation occur, often in line with Flood Risk Management Plans. The LFRMS sets out the aims and objectives for the LLFA in managing the local flood risk in its borough. Associated documents include an Action Plan of how to deliver these actions, a monitoring and reviewing plan to track progress, a Habitats Regulations Assessment (HRA) Screening Report and this SEA Screening Report. The purpose of why a SEA Screening Report should be conducted is outlined in *Section 1.1* and is a requirement for any strategy which could pose impacts to the local environment.

1.4.2 Local area information

The Richmond borough is one of 32 London boroughs and is located in southwest London and forms part of outer London. The borough is the only London borough to bisect the River Thames. The Richmond borough borders the London boroughs of Hounslow (northwest), Hammersmith & Fulham (north), Wandsworth (east) and Kingston (southeast), in addition to Elmbridge Borough County, Surrey where the River Thames flows along the southern edge of the borough.

1.4.3 LFRMS strategic objectives

Below is the list of strategic objectives which have been selected and presented within the LFRMS for the Richmond borough. These strategic objectives are partnered with those for the London Borough of Wandsworth (Wandsworth) due to the collaborative partnership between both

boroughs in delivering their flood risk management duties. These strategic objectives will later be assessed against the SEA objectives in *Section 5.2*.

A. To improve our knowledge and understanding of the risk of flooding and the interactions between different sources of flooding across the London Borough of Richmond upon Thames.

B. To encourage appropriately mitigated development across the London Borough of Richmond upon Thames by promoting sustainable multi-beneficial solutions to contribute to wider social, economic, and environmental outcomes.

C. To seek and identify funding and resources available for a targeted approach to flood risk management.

D. To proactively manage sources of local flooding to homes, critical infrastructure, and transport networks by establishing and maintaining partnerships with key organisations, including the Environment Agency and Thames Water.

E. To work with Risk Management Authorities to raise awareness of flood risk with communities, residents, and businesses, and how they can take action to protect themselves and their property by contributing to the management and reduction of flood risk.

F. To use knowledge of flood risk and climate change projections to inform and adapt the emergency response to flooding within the London Borough of Richmond upon Thames.

1.5 Consultation process

The SEA Screening Report is required to go through a consultation process which has involved three statutory consultee bodies which are: the Environment Agency (EA), Historic England and Natural England. This took place between May and June 2022 and, where necessary, amendments have been included within this version of the SEA. The 14 SEA consultation questions presented in *Section 1.3* will be repeated under their relevant sections throughout this Screening Report. A public consultation took place, following the statutory consultee consultation, in Spring/Summer 2023 of all the LFRMS documents, and all feedback has been incorporated into the final versions of these documents.

2 IDENTIFICATION OF RELEVANT POLICIES

2.1 Task A1 summary

Task A1 is to identify relevant policies, plans and programmes and environmental protection objectives. To do this a list of all relevant policies, documents and legislations that could impact upon the LFRMS and the Action Plan in relation to the SEA objectives have been compiled. These are covered in *Section 2.2* below.

2.2 Relevant policies

It is important to consider relevant policies and legislations at a range of levels including international, national, regional, and local. These policies have been presented in *Table 2-1*. For some of these legislations there is overlap with those included within Section 1 of the Richmond borough's LFRMS.

Table 2-1 Table of relevant policies and legislations to the SEA

International
UNESCO World Heritage Convention (1972)
Convention for the Protection of the Architectural Heritage of Europe (1985)
EU Habitats Directive (1992)
The Valletta Treaty *(formally European Convention on the Protection of Archaeological Heritage)* (1992)
EU Water Framework Directive (2000)
European Landscape Convention (2000)
European SEA Directive (2001)
EU Floods Directive (2007)
EU Birds Directive (2009)
EU Biodiversity Strategy for 2030 (2020)
National
Ancient Monuments & Archaeological Areas Act (1979)
Wildlife and Countryside Act (1981)
Environmental Protection Act (1990)
Planning (Listed Buildings & Conservation Areas) Act (1990)
Land Drainage Act (1991)
The UK Biodiversity Action Plan (1994)
Civil Contingencies Act (2004)
Natural Environment and Rural Communities Act (2006)
The Pitt Review - Lessons learned from the 2007 summer floods (2007)
Climate Change Act (2008)
Future Water: The Government's Water Strategy for England (2008)
Flood Risk Regulations (2009)
Flood and Water Management Act (2010)
Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)
National Standards for Sustainable Drainage Systems (2011)
National Planning Policy Guidance (NNPG) (2012)
Water Act (2014)
The SuDS Manual C753F (2015)
DEFRA: 25 Year Environment Plan (2018)

National Flood and Coastal Erosion Risk Management Strategy for England (NFCERMS) (2020)
Meeting our Future Water Needs: A National Framework for Water Resources (2020)
Environment Act (2021)
National Planning Policy Framework (2012, revised 2021)
National Planning Practice Guidance (2016, revised 2021)
Regional
Thames Catchment Flood Risk Management Plan (2009)
Mayor of London's Climate Change Adaptation Strategy (2011)
Thames Estuary 2100 Flood Risk Management Plan (2012)
Thames River Basin District, River Basin Management Plan (2015)
London Regional Flood Risk Appraisal (2018)
The London Plan (2021)
Local
Local Development Framework: Development Management Plan (2011)
Richmond's Preliminary Flood Risk Assessment (2011 (reviewed 2017))
Richmond's Local Plan (2018)
Crane Valley Partnership Strategy for the Crane Catchment (2018-2028)
Richmond's Nature Conservation Policy Statement (2019)
Richmond's Biodiversity Action Plan (2019)
Richmond's Air Quality Action Plan (2019-2024)
Colne and Crane Green Infrastructure Report (2019)
Richmond's Climate Change and Sustainability Strategy (2019-2024)
Kew Garden's World Heritage Site Management Plan (2020-2025)
Richmond's Strategic Flood Risk Assessment (2021)
Richmond's Joint Strategic Needs Assessment (2021)
Richmond's Surface Water Management Plan (2021)

2.3 A1 consultation questions

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

1. Do you feel we have included all relevant policies, documents, plans and legislation that relate to or could affect the Local Flood Risk Management Strategy?
2. If not, what additional documentation do you think should also be included?

3 BASELINE INFORMATION

3.1 Task A2 summary

Task A2 is to collect baseline information. To do this baseline information on the Richmond borough will be collated from a variety of sources and will be used to determine any key environmental issues that may exist in the Richmond borough. Although the SEA Screening Report is primarily focused on issues and effects from an environmental perspective, additional social and economic baseline indicators have been included to provide a wider scope of any potential impacts from the actions in the LFRMS. The baseline information was collected in 2022 prior to public consultation taking place.

3.2 Richmond borough characteristics

The Richmond borough is a diverse borough with a variety of infrastructure assets and important areas of conservation. The terrain of the Richmond borough increases in height away from the River Thames, with the highest points located at Richmond Park, and along the western borough boundary. Surrounding the river at lower levels are areas situated in the River Thames Flood Plain such as Strawberry Hill and Hampton Wick. Particular assets within the Richmond borough include its rail assets of the South Western Railway line, London Underground (District Line) and the London Overground. There is one town centre in the borough, which is Richmond town centre, with district centres of East Sheen, Teddington, Twickenham, and Whitton. Key open spaces in the Richmond borough are Richmond Park, Bushy Park and Kew Gardens, with additional special areas including the Wildfowl and Wetlands Trust (WWT) London Wetland Centre in Barnes. Further details on the borough are provided in the following sections exploring the baseline information for the borough.

3.3 Baseline information

This section will examine baseline information for the Richmond borough for the following environmental, social, and economic factors: biodiversity, flora and fauna, infrastructure assets, population, public health, air quality, climate factors, soil and water, and historic and cultural environments. This data will aid in identifying any potential effects the LFRMS could pose to residents in the Richmond borough and the landscape.

3.3.1 Biodiversity, flora and fauna

The Richmond borough is one of the greenest boroughs in London with 57% open green space, including over 130 Council-owned and managed parks, as of 2019 from the Climate Change and Sustainability Strategy (2019-2024) for the Richmond borough. 27 of these Council-run parks are specifically managed for nature conservation supporting biodiversity and wildlife. More than two thirds of the Richmond borough is protected by either open space or conservation area statuses resulting in the highest land values of any other London Borough, according to the Climate Change and Sustainability Strategy (2019-2024). These important areas of nature conservation, and additional sites of importance, are detailed in *Table 3-1* with their associated designations.

Table 3-1 Designated sites of natural importance in the Richmond borough from Richmond's Biodiversity Action Plan (2019)

Designation	No. of sites	Site names
World Heritage Site	1	Kew Gardens
Special Area of Conservation (SAC)	1	Richmond Park
Site of Specific Scientific Interest (SSSI)	3	Richmond Park Bushy Park & Home Park WWT London Wetland Centre
Local Nature Reserves (LNR) *From Natural England*	6	Barnes Common Crane Park Island Ham Common Ham Lands Lonsdale Road Reservoir Oak Avenue
Sites of Metropolitan Importance for Nature Conservation *From Richmond Council*	10	Including River Thames & tidal tributaries, Richmond Park & areas, Bushy Park & Home Park
Sites of Borough Importance for Nature Conservation *From Richmond Council*	20	Including Mid -Surrey Golf Course, Hampton Court Water Works, Hydes Field
Sites of Local Importance for Nature Conservation *From Richmond Council*	24	Including Marble Hill Park and Orleans House Gardens, North Sheen and Mortlake Cemeteries

This section is supported by information sourced from the Biodiversity Action Plan (2019) for the Richmond borough. Woodland habitats contain many ancient and veteran trees which support flagship species such as the Stag Beetle, Green Spotted Woodpecker and Brown Long-eared Bats. The broadleaf woodlands in the Richmond borough are nationally important and help to provide high benefit to both people and biodiversity in the area. Hedgerows are another important factor for biodiversity in the Richmond borough as these manmade structures act as natural corridors for species of flora and fauna, however since 1945 hedgerows have been in decline due to removal and neglect. Reedbeds are another important habitat within the Richmond borough but having been in decline in past decades is now defined to only a few principal sites such as Richmond Park's Pen Ponds, Lonsdale Road Reservoir, and the WWT London Wetland Centre. Species such as the Water Vole, Bittern and Reed Warbler are characteristic to reedbeds which offer a wealth of biodiversity value.

3.3.2 Infrastructure assets

The Richmond borough has a large range of critical infrastructure that is vulnerable to the risk of flooding, a breakdown of this can be found in *Table 3-2*. These infrastructure assets must be planned for and have ability to serve and/or function unimpeded by hazards or developments. They must be considered when preparing new strategy actions. The Richmond borough has a variety of green infrastructure which have the potential to offer multiple benefits. Flood risk management has the opportunity to deliver these benefits in line with the borough's Green Infrastructure Network.

Table 3-2 Infrastructure assets in the Richmond borough

Level of infrastructure	No. of assets	Types of infrastructure
Critical infrastructure assets	60	1 hospital, 46 primary schools, 9 secondary schools, 3 colleges and 1 university
Essential infrastructure assets	13	Essential transport infrastructure, essential utility services, electricity power stations, electricity grid, tube stations and water treatment works
Highly vulnerable infrastructure assets	4	Police stations, fire stations, ambulance stations and telecommunication installation
More vulnerable infrastructure assets	51	Hospitals, education establishments, waste management facilities and wastewater treatment works

In addition to this there are a number of properties at risk from various flood predictions within the borough, there are 2,063 residential properties at risk of flooding from surface water at a 1 in 100-year event. Further property numbers for each classified rainfall event are presented in *Table 3-3* which has been extracted from the Richmond Surface Water Management Plan (2021).

Table 3-3 Properties at risk of flooding from surface water in the Richmond borough

	Residential	Other	Unclassified	Total
1 in 30-year rainfall event	481	172	68	**721**
1 in 100-year rainfall event	2,063	535	255	**2,853**
1 in 1000-year rainfall event	11,788	2,177	1,137	**15,102**

3.3.3 Population

There is an estimated population of 200,000 as reported in the Joint Strategic Needs Assessment (JSNA) (2021) for the Richmond borough and it is the second smallest borough within outer London. The JSNA (2021) states that by 2029 the Richmond borough will have an estimated population of 213,000 with the largest increase to be observed within the age range of 80+ years. The Richmond borough has a population split of 51% females and 49% males with an expected 6% and 7% rise projected by 2029 respectively.

National population is expected to continue increasing for the next few years before it is predicted to plateau, and a similar trend can be expected for the Richmond borough. However, the GLA population projections suggest that the Richmond borough's population will grow at a lower rate compared to other London boroughs. The greatest population rise is expected in the ward of Mortlake and Barnes Common, with the only decrease in population forecast for the Hampton North ward. Population change has been driven by the Richmond borough having the second highest rate of natural change (more births than deaths) in London. It is expected that this will continue over the next ten years in addition to contributions from migration from other parts of London and the UK due to new housing developments.

Population growth does cause the potential for adverse impacts due to the level of development associated with the growth. For instance, new transport infrastructure can fragment habitats through a loss of green corridors or by the addition of new structures crossing rivers and can

contribute to poor water quality through increased road runoff. The impacts of infrastructure development as a result of population growth upon biodiversity and the water environment should be considered.

3.3.4 Public health

Life expectancy in the Richmond borough has risen by approximately four years since 2001-03 with male life expectancy presently at 82.5 years and females at 86.3 years. The Richmond borough has continued to be higher than the averages for London and England. In terms of deprivation, the Richmond borough lies within the least deprived quartile of London local authorities accordingly to the JSNA (2021). Further to this, the Richmond borough is amongst the least deprived boroughs in London for five out of seven of the deprivation indexed measures, including income; employment; education, skills and training; barriers to housing and services; and education.

3.3.5 Air quality

The air pollution in the Richmond borough exceeds the legal targets for both Nitrogen Dioxide (NO_2) and particles less than ten microns (PM10) levels, as noted in the Air Quality Action Plan (2019-2024) for the Richmond borough. It has previously been recorded that some locations were double these limits in 2017, and in 2018 had not decreased enough to meet the targets. However particular air pollution for the Richmond borough was below the London average as recorded in 2017 by the Public Health Outcomes Framework. The main sources of air pollution come from domestic heating, construction, and vehicles, and not all these sources originate within the borough. It has been noted that the main issue surrounds road transport pollution as previous exceedances were along main roads and highways, and in town centres.

3.3.6 Climate factors

Flooding within the Richmond borough is likely to increase significantly in the future based on climate predictions estimating increased storm events and rising sea levels. Surface water flooding is the biggest threat to the Richmond borough and can cause large scale disruption and can also become contaminated with sewage leading to health concerns. Meteorological, hydrological, and climatological events are all likely to increase in frequency and the impacts associated with these are likely to become more recurrent and severe. Public transport is likely to be affected by extreme heat events causing severe disruption across the borough, and lead to impacts on vital services. The extreme heat could also impact on the health and welfare of some of the very young and elderly residents in the borough. Temperature changes have also been seen to impact on wildlife by displacing species and increasing diseases, pests, and non-native species to become more frequent. London is situated in one of the driest parts of the UK and climate change could lead to a risk of drought and additional pressure on aquifers and reservoirs.

3.3.7 Soil and water

The Environment Agency has identified three waterbodies within the borough, to monitor the implementation of the Thames River Basin Management Plan, these are:

- The River Crane (including part of the Yeading Brook)
- Beverley Brook (Motspur Park to the River Thames, and Pyl Brook at West Barnes)

- The River Thames (Egham to Teddington, and Maidenhead to Sunbury management catchment)

These waterbodies are recognised under the EU Water Framework Directive (2000). All of these three waterbodies are defined as being 'highly modified' and as having poor ecological status, according to EA's catchment data explorer as of February 2022. A 'heavily modified' waterbody is considered such if the changes to its hydromorphological characteristics would be necessary for achieving good ecological status. And if this would have adverse effects on the wider environment, navigation (including port facilities or recreation), water storage activities, water regulation, flood protection, land drainage of other sustainable human development activities. Further explanation can be found here.

It should be noted that there is the potential for conflicts between conserving the historical and cultural environment and trying to implement WFD measures. The need for conserving heritage assets such as in channel structures, for example, could make alternative flood risk-reduction works unfeasible. Wherever possible opportunities should be taken to increase biodiversity (through the creation of fish passages and re-naturalising rivers) and increase water quality.

3.3.8 Historic and cultural environment

There are a number of key cultural, architectural, and archaeological heritage sites and/or monuments within the Richmond borough which have been detailed in *Table 3-4.* Built heritage conservation and cultural heritage assets, such as these, are likely to remain an important economic, social and environmental feature in the future for the Richmond borough. The view from King Henry VIII's Mound to St Paul's Cathedral is a protected linear view under Policy HC3 Strategic and Local Views of the London Plan (2021). Richmond records 85 conservation areas within the borough which means these areas are subject to tighter planning restrictions in order to preserve their character from alterations, the full list can be viewed here. Richmond has approximately 40% of its area designated as Archaeological Priority Areas according to Historic England (2020) further detail on these areas can be found here.

Table 3-4 Historical and cultural assets in the Richmond borough

Type of classification	No. of assets	Types of infrastructure
Listed buildings	802	Including Hampton Court Palace
Registered parks and gardens	15	Including Richmond Park
Scheduled ancient monuments	4	Including Old Brew House
Protected linear view	1	From King Henry VIII's Mound to St Pauls Cathedral
Other protected views	1	From Richmond Hill to Ham
Archaeological Priority Areas	7 (Tier 1) 24 (Tier 2) 1 (Tier 3)	Including Kew Gardens (Tier 1) Including Barnes (Tier 2) Including Petersham Meadows and Richmond Hill (Tier 3)
Conservation areas (designated heritage assets)	85	Including Amyand Park

Historic England also maintains a record of all historical assets which may be at risk. The details of these sites/buildings are within *Appendix 1* – Heritage at risk. It is important to highlight the need

to conserve, and the where appropriate enhance, the significance of heritage assets (both designated and non-designated).

3.4 A2 consultation questions

Questions asked during the consultation exercise based upon the baseline indicators:

3. Do you agree that the baseline data we have included is appropriate to the Local Flood Risk Management Strategy that is being developed? If no, please provide reason(s).
4. Do you have, or know of, any additional baseline indicators or data that should be added into this SEA Screening Report? Please provide any appropriate links and/or documents.
5. As far as you are aware, is the baseline data correct? If no, please provide any appropriate links and/or documents with correct data.

4 IDENTIFICATION OF ENVIRONMENTAL ISSUES

4.1 Task A3 summary

Task A3 identifies environmental issues and problems. To do this a list of issues have been identified from the information in policies collated in Task A1 and from the analysis of baseline information in Task A2. This is to establish any existing or possible environmental issues across the borough which could affect or be affected by the implementation of actions in the LFRMS.

4.2 Local environmental issues

By examining the baseline information from *Section 3.3*, the following environmental issues have been identified and presented in *Table 4-1*. The key environmental issues identified have been assigned a corresponding LFRMS strategic objective which will include actions that aim to improve or resolve the environmental issue.

Table 4-1 Environmental issues and their potential associated problems

Key environmental issues	Potential associated problems	Proposed LFRMS objective
Decline of all natural areas (inclusive of SAC, SSSI, LNR, and all Sites of Importance to Nature Conservation)	• The loss/fragmentation/degradation of designated sites of importance within the borough • Negative impacts on biodiversity and species numbers • Potential to exacerbate water quality issues in WFD waterbodies, harming the ecology of sensitive ecosystems	B F
Decreasing numbers of important/protected wildlife and plant species	• Loss of species diversification and biodiversity • Loss of rare and endangered species • Reductions in funding contributions to support the management of sites of natural importance	B
Decrease in biodiversity	• Degradation of local ecology • Increase in the number of diseases spread between species • Loss of livelihoods for local people • Loss of recreational space • Negative effects on food production • Negative impact upon local economy	B
Increase in the amount of critical and essential infrastructure at risk from flooding	• Severe disruption to the Richmond borough in the event of a severe flood • Potential for loss of life through primary or secondary impacts associated with the loss or lack of critical and essential infrastructure • Increase in expenditure on property repairs • Increase in insurance premiums for property owners	B C E F
Population increase (natural change and population mobility)	• Increase in the number of residents at risk of flooding • Greater need for new development to accommodate the growing population	A B D

Key environmental issues	Potential associated problems	Proposed LFRMS objective
		F
Decrease in air quality	• Increase in the number of people with respiratory health conditions • Additional numbers of vulnerable people and pressure on healthcare services • Detrimental effects to biodiversity impacting habitat quality by potentially altering pH and nutrient levels in both soils and water	B F
Increase in CO^2 emissions	• Increase in air pollution and associated issues with air quality • Increase in the localised greenhouse effect	B F
Extreme weather events (heatwaves, droughts, flooding etc.)	• Greater number of residents, properties and infrastructure at risk of flooding due to the increase in the frequency and/or intensity of precipitation events	A B E F
Depletion of water resources	• Increased pressure on the water supply for the Richmond borough, exacerbated further by projected population growth and impacts of climate change • New developments reducing the amount of permeable ground surface for water infiltration, reducing natural groundwater recharge rates	A B F
Reduction in water quality	• Risk of not achieving 'good' ecological status by WFD deadlines • Risk of impacting on groundwater quality in River Terrace gravels and deeper bedrocks • Detrimental effects to local biodiversity and ecology	A B
Maintaining the conservation of historic environments and managing degradation to historical assets	• The vulnerability of most heritage assets to flooding causing potential harm to or loss of their significance • The potential impact of flood risk managment measures on heritage assets and their settings • The potential implications of flood risk for securing a sustainable reuse for heritage assets, including their repair and maintenance • The potential impact of changes in groundwater flows and chemistry on preserved organic and paleo-environmental remains • Degradation risks posed by dewatering, increasing groundwater levels and re-wetting	A B C D

4.3 A3 consultation questions

Questions asked during the consultation exercises based upon the environmental issues that we have identified:

6. Do you agree that these are the main environmental issues relating to the Local Flood Risk Management Strategy affecting Richmond? If no, what are the main issues you believe should be included?
7. Are there any other environmental issues that you believe should be added into this SEA Screening Report? If so, please give details.
8. Do you consider any of these environmental issues to not affect Richmond? If so, please give details.

5 SEA OBJECTIVES

5.1 Task A4 summary

Task A4 is to develop the SEA objectives and framework. To do this a list of seven SEA objectives have been established from the environmental issues raised in Task A3, in addition to local knowledge and understanding relating to flood risk management. The performance of the LFRMS will subsequently be assessed against these SEA objectives in *Section 6.2*.

5.2 SEA objectives

Below is the list of SEA objectives which will be assessed against each strategic objective of the LFRMS for the Richmond borough. These can also be used to provide assessment objectives for any future reviews of the progress made by the Richmond LLFA to deliver its Action Plan tasks.

- **SEA 1:** To increase support for sites of natural importance to improve and enhance biodiversity quality, providing biodiversity net gain where feasible.
- **SEA 2:** To support policy to prevent damage and loss of priority habitats and species, including the control and eradication of non-native invasive species.
- **SEA 3:** To increase the resilience of local infrastructure, including transport networks, to the effects of climate change and from flood risk.
- **SEA 4:** To effectively manage the development of infrastructure to support a predicted population increase.
- **SEA 5:** To make efforts in improving air quality by encouraging green corridors through the borough and by supporting lifestyle changes to more environmentally friendly travel options.
- **SEA 6:** To aim for good ecology potential for water quality and secure water resources for the future, improving the WFD status of waterbodies to conserve and enhance the ecological value of rivers and wetlands.
- **SEA 7:** To conserve and enhance heritage assets and their settings particularly those at risk from neglect, decay or development pressures where flood risk or changes to the water table are a risk.

5.3 A4 consultation questions

Questions asked during the consultation exercises based upon the SEA objectives we proposed for assessment against the Local Flood Risk Management Strategy:

9. Do you agree that these proposed SEA objectives are suitable in the context of Richmond?
10. Are there any other SEA objectives that you believe should be included? If so, please give details.

6 SCREENING ANALYSIS OF THE LOCAL FLOOD RISK MANAGEMENT STRATEGY

6.1 Task A5 summary

Task A5 is to assess the scope of the SEA against the LFRMS strategic objectives to establish if there will be no effect, a potential effect, or a potentially significant effect. To do this a matrix has been created in *Section 6.2* to assess each SEA objective against each LFRMS strategic objective.

6.2 Screening analysis

Table 6-1 presents the outcomes of each LFRMS strategic objective against the SEA objectives selected in this SEA Screening Report. *Table 6-2* supports this by displaying the criteria used in *Table 6-1*. These were allocated based on best judgement from a qualitative assessment further explored in *Section 6.3*. As shown, there are no LFRMS strategic objectives that will impact negatively on the chosen SEA objectives. The analysis illustrates that there is a mixed neutral to major positive contribution from the LFRMS strategic objectives on the SEA objectives. Some neutral outcomes are predicted due to some LFRMS strategic objectives not relating to the environmental issues described within the SEA objective.

Table 6-1 Scoring matrix of LFRMS strategy objectives against SEA objectives

		SEA Objective Number						
		SEA 1	SEA 2	SEA 3	SEA 4	SEA 5	SEA 6	SEA 7
LFRMS Strategy Objective Number	A	+	0	++	++	0	++	+
	B	+	+	+	++	+	+	++
	C	0	0	0	+	0	0	+
	D	0	0	++	+	0	+	+
	E	0	0	+	0	0	+	+
	F	+	0	++	+	0	+	0

Table 6-2 Legend criteria for Table 6-1

++	Major positive effect on SEA objective.
+	Minor positive effect on SEA objective.
0	Neutral effect on SEA objective and/or dependent on implementation.
-	Minor negative effect on SEA objective.
- -	Major negative effect on SEA objective.
?	Uncertain

6.3 Screening analysis outcomes

6.3.1 LFRMS strategic objective A

To improve our knowledge and understanding of the risk of flooding and the interactions between different sources of flooding across the London Borough of Richmond upon Thames.

The analysis of strategic objective A shows that there is a majority of major positive effects on the SEA objectives, this being the case for three out of seven SEA objectives which include SEA 3, SEA 4 and SEA 6. The LFRMS strategic objective A aims to increase understanding of flood risk and flooding interactions which can support these SEA objectives and offer the potential for major positive outcomes. Addressing SEA 6 this LFRMS will offer potential benefits to water quality which could be achieved by any flood reduction measures which reduce polluting road and general urban runoff entering the water bodies. Understanding the interactions between sources of flooding will also off the opportunity for improvement to groundwater resources (aquifer recharge) by reducing impermeable surfaces. There is some potential for minor positive outcomes in relation to SEA 1 and SEA 7, conserving and enhancing sites of natural and historical importance, with neutral effects between this LFRMS strategic objective and SEA 2, regulation of species, and SEA 5, air quality. This concludes that the LFRMS strategic objective A can be screened out at this stage of the SEA process.

6.3.2 LFRMS strategic objective B

To encourage appropriately mitigated development across the London Borough of Richmond upon Thames by promoting sustainable multi-beneficial solutions to contribute to wider social, economic, and environmental outcomes.

There is a major positive outcome for this LFRMS strategic objective and SEA 4 as both are very aligned with their aim of effectively managing developments for the Richmond borough. This is similarly the case for SEA 7 where appropriately mitigated development can help to protect and enhance historical assets. Minor positive outcomes were also identified for SEA 1, SEA 2, SEA 3, SEA 5 and SEA 6. LFRMS strategic objective B offers multiple benefit solutions in its actions against flood risk as it also aims to address wider, social, economic and environmental outcomes. In addition, any measures which reduce loading on the combined sewer network to reduce frequency of any spills from Combined Sewer Overflows would have a beneficial short and long-term effect to water quality and biodiversity. There are projected to be no neutral or negative outcomes for this LFRMS strategic objective against any of the SEA objectives. For this reason, the LFRMS strategic objective B has been screened out of the SEA screening report.

6.3.3 LFRMS strategic objective C

To seek and identify funding and resources available for a targeted approach to flood risk management.

The scoring of this LFRMS strategic objective against the SEA objectives has a majority of neutral outcomes, as the topic of funding and resources is not directly linked to most of the SEA objectives and does not pose any negative implications. SEA 4 and SEA 7 have minor positive outcomes as funding is crucial to support the development of infrastructure and targeted funding streams may be available to help protect historical assets. Some of the funding which is available to LLFAs requires additional benefits to be provided alongside flood alleviation which has the potential to offer further positive benefits. However, this is dependent on the availability and success of funding

applications. These funding routes will be recommended by the LLFA to support the increase in multiple benefits within the Richmond borough helping to target site specific issues as highlighted in the key environmental issues. No negative outcomes were recorded and so LFRMS strategic objective C has been screened out.

6.3.4 LFRMS strategic objective D

To proactively manage sources of local flooding to homes, critical infrastructure, and transport networks by establishing and maintaining partnerships with key organisations, including the Environment Agency and Thames Water.

There is a mix of outcomes of neutral, minor positive and major positive for this LFRMS strategic objective. A major positive response has been reached for SEA 3 as this SEA objective directly addresses a response to managing infrastructure for the effects of flood risk which is also the aim of LFRMS strategic objective D. Minor positive outcomes were attributed to SEA 4, SEA 6 and SEA 7 due to their connection to infrastructure, water quality and historical assets respectively. Managing sources of local flood risk can offer positive outcomes for water quality as some sources of local flooding can be contaminated, so by managing this effectively there is the potential for water quality to improve. For these discussed reasons LFRMS strategic objective D has been screened out of the SEA screening process.

6.3.5 LFRMS strategic objective E

To work with Risk Management Authorities to raise awareness of flood risk with communities, residents and businesses, and how they can take action to protect themselves and their property by contributing to the management and reduction of flood risk.

It is not likely that strategic objective E will be detrimental to the environmental issues faced in the Richmond borough. All outcomes against the SEA objectives, except two, have received a neutral result concluding that they either do not negatively relate to this LFRMS strategic objective or there are no implications. By raising awareness of flood risk to residents and businesses there can be an increase to the resilience of local infrastructure and on improving water quality and potentially WFD waterbody statuses. This justifies a minor positive outcome for SEA 3 and SEA 6. The LLFA and RMAs aim to factor in raising awareness of protecting and enhancing historical assets in relation to flood risk evidencing the minor positive result for SEA 7. This LFRMS strategic objective has subsequently been screened out supported by the evidence stated.

6.3.6 LFRMS strategic objective F

To use knowledge of flood risk and climate change projections to inform and adapt the emergency response to flooding within the London Borough of Richmond upon Thames.

The results of the analysis for these LFRMS strategic objectives are mixed neutral, minor positive and major positive. This LFRMS strategic objective focuses on the issue of climate change which directly links with the aim behind SEA 3, in addition to this SEA 1, SEA 4 and SEA 6 also have the potential to be positively affected by the impacts from the actions of LFRMS strategic objective F. This is because these SEA objectives all target environmental issues which are linked to or impacted upon by climate change. By using knowledge of flood risk and climate change projections to inform

emergency response plans there can be some additional positive outcomes for these SEA objectives. As a result, this LFRMS strategic objective has been screened out.

6.4 A5 consultation questions

Questions asked during the consultation exercises based upon the assessment matrix and screening analysis outcomes:

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

7 CONCLUSIONS AND NEXT STEPS

7.1 Conclusions

The findings of this SEA reveal that the proposed LFRMS strategic objectives will not have a detrimental effect on local environmental issues. The LFRMS strategic objectives instead offer a mixed response which shows both neutral, minor positive and major positive effects. It can therefore be concluded that the LFRMS has appropriately considered the application of its actions in regard to local environmental issues. Flood risk management workstreams often have multi-benefit solutions to offer which include environmental benefits. It is for that reason and the conclusions from the screening analysis that the LFRMS does not require progression onto the appropriate assessment stage and does not require a full SEA.

7.2 Consultation of the SEA

Task A5 also incorporates a consultation with the statutory consultation bodies on the scope of the SEA. To do this, statutory consultees, listed in *Section 1.5*, were consulted with prior to a public consultation period, which took place in Spring/Summer 2023. The feedback from stakeholders and statutory consultees has been incorporated into the final version of this SEA screening report and any corresponding LFRMS documents.

Questions asked during the consultation exercises based upon the SEA Screening Report as a whole:

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

APPENDIX 1 – HERITAGE AT RISK

Below, and on the following page, is an abstract of sites/buildings within the Richmond Borough which are listed on Historic England's Heritage at Risk Register. Full details of each of these sites can be found online here.

Entry Name	Designated Site Name	Heritage Category	List Entry Number	Site Type	Site Subtype	Building Name	Street Number	Street Name	Parliamentary Constituency	Assessment Type	Condition	Occupancy / Use	Priority Category	Previous Priority Category	Owner Type	Designation	New Entry
Platt's Eyot, Hampton	Platt's Eyot	Conservation Area		Industrial	Industrial				Twickenham	Conservation area	Poor					Conservation Area, 5 LBs	No
Church of England Cemetery Chapel, Grove Road, Richmond Cemetery	CHURCH OF ENGLAND CHAPEL RICHMOND CEMETERY	Listed Building grade II	1261361	Religious ritual and funerary	Chapel	Church of England Cemetery Chapel		Grove Road	Richmond Park	Building or structure	Poor	Part occupied/ part in use	A - Immediate risk of further rapid deterioration or loss of fabric; no solution agreed		Charity (heritage)		Yes
Doughty House, 142, Richmond Hill, Richmond	DOUGHTY HOUSE	Listed Building grade II	1249955	Domestic	Residential building	Doughty House	142	Richmond Hill	Richmond Park	Building or structure	Poor	Vacant/ not in use	D - Slow decay; solution agreed but not yet implemented	D	Private	Listed Building grade II, CA	No
Boathouse 2, Platts Eyot, Hampton	Boathouse 2	Listed Building grade II	1254428	Maritime	Marine construction site	Boathouse 2		Platts Eyot	Twickenham	Building or structure	Very bad	Unknown	A - Immediate risk of further rapid deterioration or loss of fabric; no solution agreed	C	Commercial company	Listed Building grade II, CA	No
Boathouse 5 (easternmost 13 bays), Platts Eyot, Hampton	Boathouse 5 (Easternmost 13 Bays)	Listed Building grade II	1254429	Maritime	Dock and harbour installation	Boathouse 5 (easternmost 13 bays)		Platts Eyot	Twickenham	Building or structure	Very bad	Vacant/ not in use	A - Immediate risk of further rapid deterioration or loss of fabric; no solution agreed	A	Commercial company	Listed Building grade II, CA	No
Boathouse 4, Platts Eyot, Hampton	Boathouse 4	Listed Building grade II	1261295	Maritime	Marine construction site	Boathouse 4		Platts Eyot	Twickenham	Building or structure	Very bad	Vacant/ not in use	A - Immediate risk of further rapid deterioration or loss of fabric; no solution agreed	C	Commercial company	Listed Building grade II, CA	No
The Gallery at Doughty House, 142, Richmond Hill, Richmond	THE GALLERY AT NUMBER 142 DOUGHTY HOUSE	Listed Building grade II	1387232	Domestic	Residential building	The Gallery at Doughty House	142	Richmond Hill	Richmond Park	Building or structure	Poor	Vacant/ not in use	D - Slow decay; solution agreed but not yet implemented	D	Private	Listed Building grade II, CA	No
Grotto or shell house in grounds of Thames Eyot, Cross Deep, Twickenham	Grotto Or Shell House In The Grounds Of Thames Eyot	Listed Building grade II*	1080812	Gardens parks and urban spaces	Garden building	Grotto or shell house in grounds of Thames Eyot		Cross Deep	Twickenham	Building or structure	Poor	N/A	C - Slow decay; no solution agreed	C	Private, multiple owners	Listed Building grade II*, CA	No
Pope's Grotto in grounds of Radnor House School, Cross Deep (east side), Twickenham	POPE'S GROTTO IN GROUNDS OF ST CATHERINE'S HIGH SCHOOL	Listed Building grade II*	1192178	Gardens parks and urban spaces	Garden building	Pope's Grotto in grounds of Radnor House School		Cross Deep (east side)	Twickenham	Building or structure	Fair	N/A	D - Slow decay; solution agreed but not yet implemented	D	Educational (independent)	Listed Building grade II*, RPG grade II, CA	No
Air Raid Shelter, St Leonard's Court, St Leonard's Road, East Sheen SW14	AIR RAID SHELTER	Listed Building grade II	1395422	Defence	Civil defence site	Air Raid Shelter		St Leonard's Road	Richmond Park	Building or structure	Fair	N/A	C - Slow decay; no solution agreed	C	Private, multiple owners		No
Norfolk House, 8, Montpelier Row	BUCKINGHAM HOUSE DUDLEY HOUSE FARTHINGWORTH AND GATE AND RAILING NORFOLK HOUSE	Listed Building grade II*	1065390	Domestic	Residential building	Norfolk House			Twickenham	Building or structure	Very bad	Vacant/ not in use	C - Slow decay; no solution agreed	C	Private	Listed Building grade II*, CA	No

Entry Name	Designated Site Name	Heritage Category	List Entry Number	Site Type	Site Subtype	Building Name	Street Number	Street Name	Parliamentary Constituency	Assessment Type	Condition	Occupancy / Use	Priority Category	Previous Priority Category	Owner Type	Designation	New Entry
Building number 14, Platts Eyot, Hampton	Building Number 14	Listed Building grade II	1254430	Commercial	Office				Twickenham	Building or structure	Fair	Part occupied/ part in use	C - Slow decay; no solution agreed	C	Commercial company	Listed Building grade II, CA	No
Wick House, Richmond Hill, Richmond	WICK HOUSE	Listed Building grade II	1263475	Domestic	Residential building	Wick House		Richmond Hill	Richmond Park	Building or structure	Poor	Vacant/ not in use	D - Slow decay; solution agreed but not yet implemented	D	Private	Listed Building grade II, CA	No
Boathouse and deep-water dock, riverside landing stage, steps, balustrade and gates, Thames Eyot, Cross Deep, Twickenham	Boathouse And Deep-Water Dock, Riverside Landing Stage, Steps, Balustrade And Gates, Thames Eyot	Listed Building grade II	1400159	Maritime	Dock and harbour installation	Boathouse and deep-water dock			Twickenham	Building or structure	Poor	Vacant/ not in use	C - Slow decay; no solution agreed	C	Private, multiple owners	Listed Building grade II, CA	No
Loggia in the grounds of Thames Eyot, Cross Deep, Twickenham	Loggia In The Grounds Of Thames Eyot	Listed Building grade II	1401819	Gardens parks and urban spaces	Garden building	Loggia in the grounds of Thames Eyot			Twickenham	Building or structure	Very bad	N/A	C - Slow decay; no solution agreed	C	Private, multiple owners	Listed Building grade II, CA	No
Church of St Michael and St George, Wilcox Road, Fulwell	CHURCH OF ST MICHAEL AND ST GEORGE	Listed Building grade II	1393730	Religious ritual and funerary	Church	Church of St Michael and St George		Wilcox Road	Twickenham	Place of worship	Poor		D - Slow decay; solution agreed but not yet implemented	D	Religious organisation	Listed Place of Worship grade II	No