

# Strategic Environmental Assessment of the Southwark Council Flood Risk Management Strategy

## Non Technical Summary

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*Produced for*  
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# Non-Technical Summary

## Introduction

This document is a summary of the Strategic Environmental Assessment (SEA) Report prepared for consultation alongside the consultation of the Southwark Local Flood Risk Management Strategy (LFRMS).

SEA is a statutory assessment process that incorporates environmental considerations into policies, plans and programmes. It ensures that significant environmental effects arising from policies, plans and programmes are identified, assessed, mitigated, communicated to decision-makers and monitored, and that opportunities for public involvement are provided.

Guidance released to assist the development of Local Flood Management Strategies outlines that 'the Local Flood Risk Management Strategy is likely to require statutory SEA, but this requirement is something the Local Lead Flood Authority (LLFA) must consider'. Southwark Council as the LLFA considers that its emerging LFRMS requires an SEA to be undertaken.

To date as part of the SEA process an initial Scoping Report, the full Environmental Report, and a Non Technical Summary of the Environmental Report have been developed.

## The London Borough of Southwark's Local Flood Risk Management Strategy

Under the requirements of the Flood and Water Management Act 2010 (FWMA), Southwark Council's position as LLFA means that they are required by law to develop, maintain, apply and monitor a LFRMS. The FWMA defines 'local flood risk' as that arising from:

- Surface run off;
- Groundwater; and
- 'Ordinary watercourses' including risks from a lake, pond or other areas of water which flow into an ordinary watercourse.

Southwark's LFRMS will provide strategic direction and proactively manage flood risk in the borough whilst satisfying the requirements of the FWMA. The primary purpose of the strategy is:

'to ensure that, as far is reasonably practical, the risk of flooding to human health and life, the environment, economic activity, infrastructure and cultural heritage arising from surface water, ground water and ordinary water courses is minimised.'

To deliver the LFRMS primary purpose, the Council developed nine key objectives. These are listed below.

*Objectives:*

- a) ensure a clear understanding of local flood risks, so that investment in risk management can be prioritised and implemented most effectively;
- b) develop and maintain a community and partnership based engagement in the management of flood risk, encouraging beneficiaries to invest in the management of risk where possible;
- c) set out clear and consistent plans for risk management so that communities and businesses can make informed decisions about managing residual risks;
- d) encourage innovative management of flood risk, taking account of the needs of communities and the environment;
- e) promote sustainable measures to reduce flood risk and provide multiple benefits to local communities;
- f) develop links between the local flood risk management strategy and local spatial planning;
- g) co-operate with neighbouring LLFAs to ensure effective risk management of flooding and compliance with the Water Framework Directive;
- h) increase environmental protection and integrate considerations into the preparation and implementation of policies and programmes that promote sustainable development;
- i) ensure that emergency plans and responses to flood incidents are effective and that communities are able to respond properly to flood warnings; and
- j) help communities to recover more quickly and effectively from flooding incidents.

*Action Plan Measures*

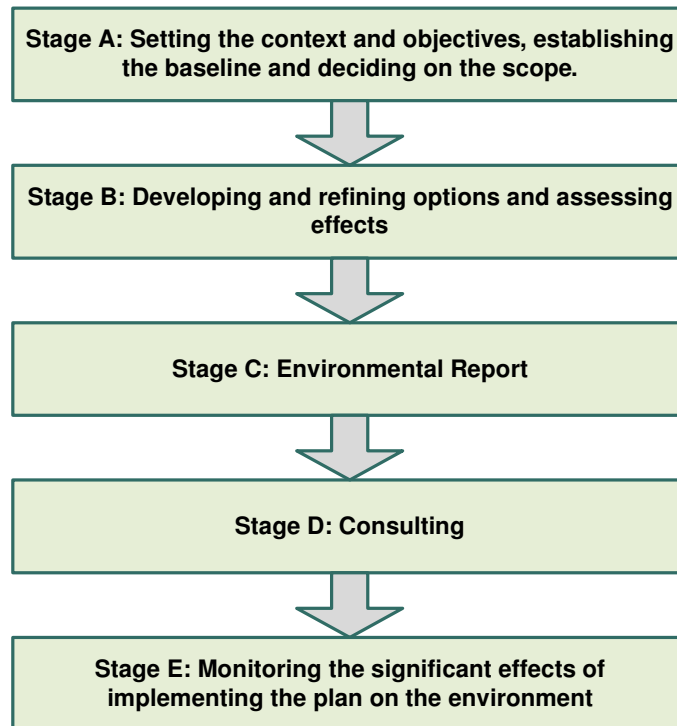
The Southwark LFRMS sets out a number of measures that form an Action Plan. The measures are grouped into measures categories that could be implemented in the delivery of the LFRMS objectives and primary purpose.

- A – Resources, Structure and Capacity to fulfil LLFA requirements under the Flood and Water Management Act 2010 and Flood Risk Regulations 2009.
- B – Communication, Partnerships and Community Engagement.
- C – Emergency Response and Recovery.
- D – Community and Infrastructure Resilience.
- E – Planning and Development Policies.
- F – Flood Alleviation Feasibility, Investigations and Design.
- G – Flood Alleviation Scheme Implementation.
- H – Drainage Asset Operation and maintenance.

## The SEA Process

The approach taken for the SEA was based on the Office of the Deputy Prime Minister's 'A Practical Guide to the SEA Directive' (2005) and current best practice guidance. There are five key stages in the SEA process shown below.

### SEA Process Stages



### Scoping Summary: Current environmental conditions/ key issues and developing the SEA Framework

An important part of the SEA was to establish what the environment is like in Southwark now and how this might change in the future, this was documented in a Scoping Report. The Scoping Report was completed in October 2012 and consulted upon during October/ November 2012, it included:

- a review of relevant plans, programmes and environmental protection legislation, focusing on those that may influence or be influenced by the LFRMS;
- topic based summaries of the current baseline environmental information, in terms of climatic factors, air; biodiversity, fauna and flora, geology and soils, water; population and human health, material assets, cultural heritage, townscape/ landscape (and the predicted evolution of the baseline without the LFRMS);
- identification of key issues, challenges and opportunities for the LFRMS; and
- proposed SEA Framework including SEA objectives, assessment criteria and potential monitoring indicators.

### *Key Issues in Southwark*

- **Climate change** is predicted to result in more extreme weather events, increased temperatures and rising sea levels. London's average winter precipitation is projected to increase by 15%. There is likely to be increased risk of tidal, river and surface water flooding.
- **Biodiversity, flora and fauna** in the borough is under threat from development and increased population. If possible, biodiversity should be protected and enhanced.
- There have been a number of recent **flood events** that have impacted Southwark; these include surface water flooding events in 2004, 2006 and 2007, and a tidal flooding event in 2005.
- The Water Framework Directive sets an objective to achieve at least 'good' **water quality** status in all water bodies by 2015. Currently within the Thames River Basin District, 23% of surface waters are at good or better ecological status/ potential and 28% of assessed surface waters are at good or better biological status.
- Southwark's experienced relatively large **population growth** (12.3%) between 2001 and 2011. The increasing population adds pressure for new infrastructure and development. A high population density means that flooding events have the potential to impact a large number of people in a relatively small area.
- The adverse impacts to **human health** associated with flood events including perceived risk of flooding and stress related illnesses.
- The coverage and **accessibility of community and public transport** across the borough varies significantly.
- There are a large number of **cultural heritage** resources within Southwark including seven Scheduled Ancient Monuments, approximately 2,200 listed buildings and 43 conservation areas. There are 30 buildings currently 'at risk' (sites that are most at risk of being lost as a result of neglect, decay or inappropriate development) according to the Buildings at Risk Register.
- The Mayor of London has identified a number of public views that are important for all of London. Southwark acts as a statutory consultee for a number of these **protected views**. These should be conserved and enhanced.
- Southwark covers areas of diverse housing types. To meet **growing housing needs** the Southwark Core Strategy details the plan for 24,450 homes before 2026. Most of the sites identified for development are located in the northern part of the borough, within the Thames flood plain.
- Southwark is a fast growing **tourist destination** within London; housing tourist attractions including the Tate Modern and Shakespeare's Globe Theatre. It is an important part of the borough's economy.

### *Development of the SEA Framework*

Part of the SEA process was to create an SEA framework for assessment. This looked at the current environmental issues identified in the last section of this summary to produce objectives to help assess the performance of LFRMS and its effects on the local environment.

The final SEA objectives are listed in the table below.

SEA Objectives
1. Adapt to and mitigate the impact of climate change
2. To ensure that flood management related activities use natural resources more efficiently and sustainably, in particular land, mineral aggregates, water and fuel
3. To ensure protection and enhancement of biodiversity at designated sites
4. To promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations
5. Promote the conservation and wise use of land, and protect soil quality and quantity
6. Prevent pollution to the water environment and protect resources
7. Reduce vulnerability to flooding
8. To reduce the flood risk to population and properties and to contribute to flood risk management within Southwark
9. To safeguard and promote existing public access, navigation and recreational resources and to promote education on the environment
10. Increase accessibility to open space and green infrastructure
11. Protect and enhance the historic environment, heritage assets and their setting (including architectural and archaeological heritage)
12. To protect and enhance attractive townscapes/ landscapes in terms of both their visual quality and their character
13. Protect and enhance green infrastructure and open space
14. Reduce economic cost of flood damage
15. Ensure the potential impact of flooding on existing and future housing and critical infrastructure is minimised
16. Encourage Sustainable Tourism

### **Consideration of Alternatives**

A high level assessment was undertaken to compare possible alternative strategic approaches for Southwark Council to manage flood risk within the borough. The approaches considered were do nothing (existing flood management assets and



activities abandoned), business as usual (maintains the current approach), maintain current flood risk (flood management assets and activities developed in line with climate change projections) and a proactive approach to flood risk (implementation of a proactive LFRMS).

It was concluded that the only realistic option is to take a pro-active approach to flood risk through the implementation of an LFRMS.

### **Assessment of the Southwark LFRMS Objectives**

Testing the compatibility of the LFRMS outcomes against the SEA objectives is the first task in Stage B of the SEA process. This exercise identifies where there are tensions or synergies that exist between the different objectives, and any clear conflicts that should be addressed. It is primarily used to inform development of the LFRMS and secondarily, to refine the LFRMS objectives.

Testing of the objectives identified that none of the objectives are fundamentally incompatible with the SEA objectives and that the majority of the LFRMS objectives are either compatible or unrelated to the SEA objectives. Strategy objectives to develop a clear understanding of local flood risks, increase community engagement, outline clear plans for management of flood risk, and flood risk integration with new development are LFRMS objectives that are highly compatible and supportive of the SEA objectives.

### **Appraisal of the Action Plan Measures**

The measures were appraised against the SEA Framework by determining the level of their environmental performance against the SEA objectives.

Overall, none of the LFRMS measures are considered to have a negative environmental effect, and unsurprisingly for a strategy that aims to reduce overall flood risk the majority of the action plan measures have a positive effect on the environment.

There are uncertainties attached to the potential effects of measures that would involve the implementation of physical works to alleviate flooding (measure category g). While the LFRMS measures seek to reduce flood risk, there is also the potential that physical works could have adverse impacts on biodiversity, habitats, species and soils.

Detailed results of the assessment can be found in the SEA Report (November, 2014).

### **Cumulative Effects**

Synergistic positive effects are anticipated upon reducing flood risk through the various measures proposed within the LFRMS with cumulative positive effects realised by identifying and encouraging local level measures to minimise the risk and impacts of local flooding. This will serve to improve resilience at a community level,

encourage greater ownership of assets, implementation of sustainable drainage systems.

### **Conclusions and Recommendations**

The conclusions of the assessment of the draft LFRMS are generally positive with no negative environmental effects (either minor or major) identified. The Strategy takes a pro-active approach to flood risk management and there is a clear consideration to integrate environmental issues and opportunities into the objectives of the LFRMS. It is considered that the LFRMS would have major positive effects on adapting and mitigating climate change; reducing vulnerability to flooding; reducing flood risk to population and properties; reducing the economic cost of flooding; and minimising the impact on housing and critical infrastructure. Many of the proposed measures to deliver the LFRMS also have the potential for secondary environmental benefits.

It is recommended that the Strategy provides further information on the methods that will be employed to mitigate the potential environmental effects of physical works. An example would be to develop measures incorporating an Environmental Management Plan across physical works schemes, including those that do not qualify for statutory Environmental Impact Assessment.

It is also recommended that although it is important to identify and prioritise areas that are at more severe risk of flooding, it is also important to ensure that as far as is feasibly possible all members of the community are made aware of flood risk and measures to reduce its impacts.

### **Monitoring of the Effects of the Strategy**

Monitoring the significant effects of implementing the LFRMS will be an important ongoing part of the SEA process. SEA monitoring involves measuring indicators which provide a better understanding of the links between the implementation of the plan and its effects (either positive or negative). This allows any negative effects to be identified and appropriate remedial action to be taken.

Aims and methods for SEA monitoring will be finalised during preparation of the SEA Statement which will accompany the adopted version of the LFRMS and the SEA report including changes resulting from consultation. The finalised monitoring arrangements will be designed to provide information that can be used to highlight specific performance issues and significant effects, and lead to more informed decision-making.

### **Next Steps**

The findings of this Environmental Report will be taken into account by Southwark Council as it finalises the LFRMS. The final Environmental Report will be published following consultation with statutory consultees, stakeholders and the public and then making any necessary amendments and updates to the documents.

Following adoption of the LFRMS, an SEA Statement is produced which outlines how the SEA process has influenced the development of the Southwark LFRMS,

how consultation comments were taken into consideration and how the Strategy will be monitored.