

# Strategic Environmental Assessment of Southwark Council's Local Flood Risk Management Strategy

## Adoption Statement

April 2015

*Produced for*  
Southwark Council

By



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# 1 Introduction

This Strategic Environmental Assessment (SEA) Adoption Statement represents the final stage of the SEA process, which has assisted in shaping the development of the Southwark Council Local Flood Risk Management Strategy (LFRMS) through to adoption. It should be read in conjunction with the SEA Environmental Report, dated November 2014.

## 1.1 Local Flood Risk Management Strategy

The key objectives of the strategy are to:

- Ensure a clear understanding of local flood risks, so that investment in risk management can be prioritised and implemented most effectively.
- Develop and maintain a community and partnership based engagement in the management of flood risk and encourage beneficiaries to invest in the management of risk where possible.
- Set out clear and consistent plans for risk management so that communities and businesses can make informed decisions about managing residual risks.
- Encourage innovative management of flood risk, taking account of the needs of communities and the environment.
- Promote sustainable management of flood risk and provide multiple benefits to local communities
- Develop links between the local flood risk management strategy and local spatial planning.
- Co-operate with neighbouring Lead Local Flood Authorities (LLFA) to ensure effective risk management of flooding and compliance with the Water Framework Directive.
- Increase environmental protection and integrate considerations into the preparation and implementation of policies and programmes that promote sustainable development.
- Ensure that emergency plans and responses to flood incidents are effective and that communities are able to respond properly to flood warnings.
- Help communities to recover more quickly and effectively from flooding incidents.

## 1.2 SEA Methodology

The SEA methodology followed is set out for information in Appendix 1.

### **1.3 Content of this Adoption Statement**

The SEA Regulations require that a ‘statement’ is made available to accompany the plan, as soon as possible after the adoption of the plan or programme. The SEA Regulations recommend that the statement should contain the following:

- The reasons for choosing the LFRMS as adopted, in the light of other reasonable alternatives (Section 2);
- How environmental considerations have been integrated into the LFRMS (Section 3);
- How consultation responses have been taken into account (Section 4); and
- Measures that are to be taken to monitor the significant environmental effects of the LFRMS (Section 5).

## 2 Consideration of Alternatives

The SEA Directive requires that the Environmental Report should consider reasonable alternatives to the plan, taking into account objectives and geographical scope. As such, four alternatives to the management of flood risk have been considered.

The Environmental Report undertook a high level comparison of the alternatives, to identify the potential effects of implementing the alternatives on the identified key issues within Southwark. The alternatives that were considered are listed below and their potential effects are summarised in Appendix 3 of the Environmental Report.

- **Do Nothing** – where existing flood management assets and flood management activities related to surface water, ground water and ordinary water courses are abandoned.
- **Business as Usual** – maintains the current approach to flood management and is the likely status without strategic action. This represents what would occur if no further plans were put in place beyond existing projects, government policies and statutory obligations, and is included to assess whether strategic action is required.
- **Maintain Current Flood Risk** – where existing flood management assets and flood management activities related to surface water, ground water and ordinary water courses would be developed in line with climate change projections.
- **Proactive Approach to Flood Risk** – this approach would see the implementation of a LFRMS. It takes a proactive approach to managing flood risk and reducing environmental, social and economic impacts due to flooding.

A high level comparison of the alternatives concludes that the only realistic option, as a high level strategy, is to take a pro-active approach to flood risk through the implementation of a LFRMS. This conclusion was taken in the context of:

- The statutory duties of the London Borough of Southwark as the Lead Local Flood Authority
- Achieving the strategic aims and objectives of the National Strategy for Flood and Coastal Erosion Risk Management.

## 3 Integration of environmental considerations

Within Stage A of the SEA process, key documents and baseline data were assessed to determine the key environmental considerations in the Borough that would assist in shaping the SEA objectives (presented in the SEA Scoping Report) against which the LFRMS was considered. At adoption stage, it is useful to understand how these environmental considerations have been integrated into the LFRMS.

The SEA Scoping Report for the LFRMS identified the following environmental considerations:

- Climatic Factors
- Air
- Biodiversity, Flora and Fauna
- Soil
- Water
- Population & Human Health (includes transport, economics, tourism)
- Material Assets (includes transport, economics, tourism)
- Cultural Heritage
- Landscape.

The adopted LFRMS has addressed many of these environmental considerations through taking into account the findings of the SEA process. Examples of proposals from the LFRMS that seek to address some of the environmental considerations are set out in section 3.2 of this Adoption Statement.

### 3.1 Habitats Regulation Assessment

A Habitats Regulations Assessment (HRA) is undertaken during the development of a programme or plan that is likely to have an adverse effect on any designated Natura 2000 sites. Natura 2000 sites are designated by the EC Directive on the Conservation of Wild Birds 79/409/EEC 1979 (Special Protection Areas (SPAs) and the EC Directive on the Conservation of Natural Habitats of Wild Fauna and Flora 92/43/EEC 1992 (Special Areas of Conservation (SACs)).

Initial screening identified that the nearest Natura 2000 site is located over 10km from the study area. It is not anticipated that the LFRMS will have any impact on this site. As such, a HRA was deemed unnecessary for the LFRMS.

### 3.2 How the Environmental Report has been taken into account

The SEA Environmental Report has contributed to the development of the LFRMS by providing an assessment of the Plan against environmental considerations. The SEA process provides an audit trail and formal statement on the assessment of options, alongside the LFRMS at each stage of the process.

The comments received on the SEA Scoping Report assisted in defining the SEA Objectives, which were then used to test the LFRMS's Objectives. The assessment matrices are set out in Appendix 4 of the SEA Environmental Report and included below are examples of proposals from the LFRMS that seek to address some of the environmental objectives of the SEA.

Principally, there are nine objectives in the FRMS that seek to protect and improve the environment. These are:

- Develop clear understanding of local flood risks;
- Engage in local partnerships and funding to manage flood risks;
- Establish clear and consistent risk management plans to inform local decisions;
- Encourage innovation in the management of flood risk;
- Promote sustainable interventions that provide multiple benefits to communities;
- Integrate local flood risk management strategy and spatial planning;
- Increase environmental protection and promote sustainable development;
- Ensure effective flood warning, emergency response and recovery systems; and
- Assist communities and individuals to recover from flooding.

Specific measures to achieve these objectives include:

- Establish internal and external partnerships for managing flood risk;
- Undertake detailed studies and assessments of identified critical drainage areas;
- Raise awareness and preparedness about flood risk, consequences, response and recovery;
- Ensure sustainable development planning and adaption;



- Effective management and maintenance of flood and drainage assets; and
- Develop community flood plans.

## 4 Consultation

### 4.1 SEA Scoping Report

The SEA Scoping Report was consulted on during November 2012. This involved the following statutory consultees; the Environment Agency, English Heritage and Natural England and a response was received from each.

Consultation responses received on the SEA Scoping Report are set out in Appendix 1 of the SEA Environmental Report, together with a description of how the comment has been addressed within the process.

### 4.2 SEA Environmental Report

Consultation on the SEA Environmental Report was undertaken from November 2014 to February 2015. The consultees included the following three statutory environmental bodies: Natural England, Environment Agency and English Heritage. The SEA Report was made available for their review alongside the Local Flood Risk Management Strategy. In addition, the LFRMS and SEA were placed on the Southwark Council website, together with consultation questionnaires which set out a number of questions.

Consultation responses were received from Natural England and English Heritage and the following tables set out the responses received and explain how the issues raised will be addressed. No response was received from the Environment Agency. One consultation questionnaire from Southwark’s website was filled out and returned.

Table 4-1 - Consultation Responses Natural England

<b>SEA Environmental Report Consultation Responses</b>	
<b>Contact Name</b>	David Hammond
<b>Organisation</b>	Natural England
<b>Date Received</b>	06 January 2014
<b>Comment</b>	<b>Mouchel Response</b>
The approach and methodology used are appropriate and in line with advice that would be offered by Natural England, covering the topics and issues we would like to see considered in such a document. Relevant legislation has been identified and sourced together with appropriate designated sites being identified and referenced.	Noted.
<u>Chapter 2: Local Flood Risk</u>	Noted.

<b>SEA Environmental Report Consultation Responses</b>	
<b>Contact Name</b>	David Hammond
<b>Organisation</b>	Natural England
<b>Date Received</b>	06 January 2014
<b>Comment</b>	<b>Mouchel Response</b>
<p><u>Management Strategy</u></p> <p>Paragraph 2.3 lists the key objectives for the Strategy listed A to J, all of which can be broadly supported, especially (H) 'increase environmental protection and integrate considerations into the preparation and implementation of policies and programmes that promote sustainable development' this is in line with the National Planning Policy Framework (NPPF).</p>	
<p><u>Under Chapter 4: Identifying Relevant Policies, Plans and Programmes and Appendix A: Policies, Plans and Programmes.</u></p> <p>The London Plan 2011 (Table 4.1) is referenced; the Council may wish to consider the 2013 Version together with the Further Alterations to the London Plan (FALP). The alterations are being undertaken to address new and increased population figures for London and consequent increase in infrastructure requirements. Additional information is being used to update the baseline of the London Plan and the Council may find more up to information to assist their strategy.</p>	<p>Policies reviewed and incorporated into the Policies, Programmes and Plans of the SEA Scoping Report.</p>
<p>Table 4.3 sets out the SEA Objectives with sixteen listed, which can be broadly supported, especially:</p> <p>3) Biodiversity</p> <p>4) Habitats</p>	<p>Noted</p>

<b>SEA Environmental Report Consultation Responses</b>	
<b>Contact Name</b>	David Hammond
<b>Organisation</b>	Natural England
<b>Date Received</b>	06 January 2014
<b>Comment</b>	<b>Mouchel Response</b>
10) Accessibility to open Space and Green Infrastructure	
<p><u>Chapter 5: Baseline</u></p> <p>The topics and themes referenced here cover the issues and areas that Natural England would wish to see considered in such a document, and we are pleased to see reference to the All London Green Grid as well as the South East London Green chain Plus.</p>	Noted
<p>Reference to the Habitats Regulation Assessment is acknowledged and the conclusion given the distance of the nearest Natura 2000 sites that the Appropriate Assessment of the Plan has been scoped out can be accepted.</p> <p>The approach and methodology used for this assessment is in line with legislation and advice that would be offered by Natural England and therefore the conclusion that no likely significant effect is identified and that there is no need to undertake and Appropriate Assessment can be agreed in respect of the Southwark Local Flood Risk Strategy.</p>	Noted

Table 4-2 - Consultation Responses English Heritage

<b>SEA Environmental Report Consultation Responses</b>	
<b>Contact Name</b>	Katharine Fletcher
<b>Organisation</b>	English Heritage
<b>Date Received</b>	15 December 2014
<b>Comment</b>	<b>Mouchel Response</b>

<b>SEA Environmental Report Consultation Responses</b>	
<b>Contact Name</b>	Katharine Fletcher
<b>Organisation</b>	English Heritage
<b>Date Received</b>	15 December 2014
<b>Comment</b>	<b>Mouchel Response</b>
Appendix 1 – We welcome the amendments that have been brought forward following English Heritage’s last response.	Noted
Para 5.9.2 – The heritage at Risk Register is published by English Heritage annually. The 2004 Register is available on our website at: <a href="http://risk.english-heritage.org.uk/register.aspx?Rs+1&amp;rt=0&amp;pn=4&amp;st=a%di=Southwark&amp;ctype=all&amp;crit">http://risk.english-heritage.org.uk/register.aspx?Rs+1&amp;rt=0&amp;pn=4&amp;st=a%di=Southwark&amp;ctype=all&amp;crit</a> . The information shown is helpful, and should remain, however, it would be appropriate to make reference to the annual update of the Register in the Environmental Report so that the latest information is readily accessible.	Comment on the annual review of the Register has been added to Appendix 2 of the SEA Environmental Report.
Para 5.9.3 – We welcome the references here to the Outstanding Universal Value, significance and setting of the Tower of London World Heritage Site (WHS). It would be suitable at the end of the second paragraph to amend the text to: ‘The Outstanding Universal Value, significance and setting of the Site has an influence on the character of Southwark in terms of the need for new development to be sensitive to, and potentially enhance, the World Heritage Site’.	Para 5.9.3 of the SEA Environmental Report has been updated.
Section 6 Strategic Environmental Assessment Framework – We support the SEA objective and potential indicators in Table 6.1 for cultural heritage.	Noted

<b>SEA Environmental Report Consultation Responses</b>	
<b>Contact Name</b>	Katharine Fletcher
<b>Organisation</b>	English Heritage
<b>Date Received</b>	15 December 2014
<b>Comment</b>	<b>Mouchel Response</b>
<p>Appendix A Plans, Policies and Programmes –</p> <p>Some documents referenced are now superseded by more recent publications and guidance. We would suggest that within the national policy section ‘The Historic Environment: A Force for Our Future’ is now out of date, and recent national policy for the historic environment should be referred to - the National Planning Practice Guidance. Within the NPPF the definition of sustainable development refers to the historic environment as a consideration within the sustainable development refers to the historic environment as a consideration within the ‘environmental’ dimension (para 6) whilst the conservation of heritage assets is also referred to in the core development principles (para 6) whilst the conservation of heritage assets is also referred to in the core development principles (para 7). It would also be useful to reference English Heritage’s guidance ‘The setting of Heritage Assets’ – this is in the process of being updated but remains valid.</p>	Text updated in the SEA Scoping Report.
<p>We are pleased to see reference to the Mayor’s Guidance on World Heritage Sites and the borough’s conservation area appraisals.</p>	Noted
<p>For Category A, cultural heritage – it would be worth identifying whether any proposed works would likely to adversely affect the significance and setting of heritage assets in other boroughs,</p>	Text updated in Appendix 5 of the SEA Environmental report.

<b>SEA Environmental Report Consultation Responses</b>	
<b>Contact Name</b>	Katharine Fletcher
<b>Organisation</b>	English Heritage
<b>Date Received</b>	15 December 2014
<b>Comment</b>	<b>Mouchel Response</b>
especially the World Heritage Site across the river.	

Table 4-3 – Online Consultation Questionnaire Response

<b>SEA Environmental Report Consultation Responses</b>	
<b>Contact Name</b>	Not given
<b>Organisation</b>	Not given
<b>Date Received</b>	Not given
<b>Question and Answer</b>	<b>Mouchel Response</b>
<p>1. Have all relevant plans, programmes and policies been considered?</p> <p>Yes</p>	Noted.
<p>2. Are you content that Section 4.3 and Appendix 2 set out an accurate description of the current environmental baseline?</p> <p>Yes</p>	Noted.
<p>3. Are you aware of any further environmental information that will help to inform the assessment findings?</p> <p>2<sup>nd</sup> time in 14 years 2<sup>nd</sup> questionnaire Council Camden/Southwark</p>	Noted, but this information is not relevant to the SEA and has therefore not been taken into account.
<p>4. Do the SEA objectives reflect the right aspirations for development of more sustainable approaches to surface water management?</p> <p>Yes</p>	Noted.
<p>5. Are you aware of other 'reasonable alternatives' for the management of flood</p>	Noted, but this information is not relevant to the SEA and has therefore not been

<b>SEA Environmental Report Consultation Responses</b>	
<b>Contact Name</b>	Not given
<b>Organisation</b>	Not given
<b>Date Received</b>	Not given
<b>Question and Answer</b>	<b>Mouchel Response</b>
<p><i>risk within Southwark that should be considered as part of the SEA process?</i></p> <p>Yes – Awareness Programmes.</p>	taken into account.
<p><i>6. Do you agree with the predicted environmental effects of the LFRMS measures set out in Section 6 of the Environmental Report?</i></p> <p>Not answered</p>	Noted.
<p><i>7. How should the LFRMS balance objectives to protect and enhance the natural environment with the need to manage flood risk to the human environment?</i></p> <p>Workshops, seminars, leaflet display.</p>	Noted, but this information is not relevant to the SEA and has therefore not been taken into account.
<p><i>8. What are your thoughts on proposals for monitoring the environmental effects of the LFRMS?</i></p> <p>Metro newspapers, Job Centre Plus, Evening Standard, Mental Health Organisation.</p>	Noted.
<p><i>9. Do you have any comments on the proposed structure of the Environmental Report?</i></p> <p>Check Home Office, Colleges websites.</p>	Noted, but this information is not relevant to the SEA and has therefore not been taken into account.
<p><i>10. Do you have any further comments on the proposed approach and scope of the SEA?</i></p> <p>Not answered.</p>	Noted.



## 5 Monitoring Significant Effects

The SEA Regulations require the significant environmental effects of implementing the plan or programme to be monitored. Responsible Authorities may already monitor implementation of plans or programmes against their objectives or targets. Some of these may be environmental, but this will not necessarily be enough to satisfy the Directive. Responsible Authorities must ensure when designing their monitoring arrangements that they comply with the Directive.

Monitoring in terms of the LFRMS takes the form of indicators contained within the SEA which are set out below. These monitor impacts from an environmental viewpoint. The results of monitoring can be used to inform future plans and programmes, so it is recommended that monitoring be carried out on a regular basis, ideally annually.

### 5.1 SEA Monitoring Indicators

The Practical Guide to Strategic Environmental Assessment Directive (DCLG – Department of Communities and Local Government, previously ODPM, 2005) provides guidance on the monitoring of the SEA.

The first step is to consider exactly what needs to be monitored. Monitoring measures must be clearly linked to the SEA process, for example:

- The objectives, targets and indicators that were developed for the SEA (see Stage A).
- Features of the environmental baseline that will indicate the effects of the plan or programme (see Stage A).
- The likely significant effects that were identified during the effects assessment (see Stage B).
- The mitigation measures that were proposed to offset or reduce significant adverse effects (see Stage B).
- Monitoring needs to consider both adverse and beneficial effects.

The following table recommends a number of monitoring indicators that were set out previously in the SEA Environmental Report, and will be used to measure the progress of the LFRMS against the SEA objectives. These have been based on the objectives that were developed for the SEA and draw upon the objectives within the LFRMS.

Table 5-1 - Monitoring Indicators

SEA Objectives	Monitoring Indicators
<b>Climatic Factors</b>	
1. Adapt to and mitigate the impact of climate change.	Length of green infrastructure network Number of new flood prevention schemes developed Number of flood incidents recorded
2. To ensure that flood management related activities use natural resources more efficiently and sustainably, in particular land, mineral aggregates, water and fuel.	Number of flood related developments accredited to CEEQUAL Number of planning applications that include aspirations for a Very Good or Excellent BREEAM rating in buildings related to flood management.
<b>Biodiversity, Flora and Fauna</b>	
3. To ensure protection and enhancement of biodiversity at designated sites	Change in areas designated for their intrinsic environmental value, including sites of international, national, regional, sub-regional or local significance:  a) Loss b) Addition
	Area of land designated as a Local Nature Reserve (LNR)
	Area of land designated as Site of Importance for Nature Conservation (SINC)
4. To promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations	Percentage of land designated as a SINC within the local authority area in 'positive management'
	Proportion of biodiversity enhancement schemes implemented due to construction of flood management schemes, for example wild-flower planting on roadside verges and street trees.
	Number of biodiversity enhancement schemes implemented through flood management related activities to promote priority species/habitats in Biodiversity Action Plans
<b>Geology and Soil</b>	
5. Promote the conservation and wise use of land, and protect soil quality and quantity	% of Part 2A sites cleared up/ discharged
	Number of new flood prevention schemes developed to protect land at risk from flooding
	Area of land provided with protection measures to protect from flooding

SEA Objectives	Monitoring Indicators
<b>Water</b>	
6. Prevent pollution to the water environment and protect resources	Planning permission granted contrary to Environment Agency advice on Source Protection Zones
	Proportion of suitable applications granted with sustainable urban drainage system (SUDS)
7. Reduce vulnerability to flooding	Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds
	Area of urban development provided with flood protection measures
	Properties at risk from water flooding (from a 1 in 200 year event)
<b>Population &amp; Human Health</b>	
8. To reduce the flood risk to population and properties and to contribute to flood risk management within Southwark	Number of properties at risk from fluvial and surface water flooding
	Economic cost of flood damage
9. To safeguard and promote existing public access, navigation and recreational resources and to promote education on the environment	Length of footpaths
	New or additional recreational facilities, or increased access to open spaces
10. Increase accessibility to open space and green infrastructure	Major additional open space land provided in association with other development
	Area of open space permitted to be converted to other uses specifically flood management related
	Area (ha) of Local Nature Reserve per 1,000 population
	Total km of new cycle routes during monitoring period
	Length of green infrastructure network, including greenways
	Total km of public Rights of Way (RoW) network
<b>Cultural Heritage</b>	
11. Protect and enhance the historic environment, heritage assets and their setting (including architectural and archaeological heritage)	% of designated sites, listed buildings and conservations areas provided with flood protection measures
	The number of flood related schemes that avoid causing harm and contributions are made to the enhancement of heritage assets or their setting

SEA Objectives	Monitoring Indicators
<b>Townscape/Landscape</b>	
12. To protect and enhance attractive townscapes/ landscapes in terms of both their visual quality and their character	Number of flood related applications refused because of adverse effects on the designated landscape areas
	Number of visual impact assessments undertaken as part of any flood related planning applications
<b>Material Assets</b>	
13. Protect and enhance green infrastructure and open space	Number of urban parks
	Total km of public Rights of Way (RoW) network
	Total km of new cycle routes during monitoring period
	Major additional open space land provided in association with other development
	Area of open space permitted to be converted to other uses specifically flood management related
	Number of Green Spaces with a Green Flag Award
14. Reduce economic cost of flood damage	Economic cost of flood damage
15. Ensure the potential impact of flooding on existing and future housing and critical infrastructure is minimised	Economic cost of flood damage
	Conflict with existing or proposed key transport routes (recreational and commercial) or infrastructure e.g. closures/ restrictions
16. Encourage sustainable tourism infrastructure	Visitor spend/ numbers
	Positive impact on surrounding land use in terms of the local economy

## 6 Appendix 1

### 6.1 SEA Methodology

#### Approach to the SEA

The approach to the SEA stages completed to date (A to C) has been to provide an expert judgement based system of prediction and assessment that is transparent and auditable.

Current best practice guidance has been used to inform the process:

- A Practical Guide to the Strategic Environmental Assessment Directive (Department of Communities and Local Government, previously the Office of the Deputy Prime Minister, 2005).

This guidance has been used in conjunction with other best practice guidelines that include:

- Sustainability Appraisal and the Historic Environment (English Heritage).
- Catchment Flood Management Plans and the Historic Environment (Environment Agency 2007).
- Strategic Environmental Assessment and Biodiversity: Guidance for Practitioners (Royal Society for the Protection of Birds 2004).

The SEA process is undertaken in five main stages as outlined in Table 3.1, to date Stages A to C have been completed. The table details the timescales of the work undertaken and future work to be completed.

### 6.2 Data Limitations

It should be noted there is a large amount of environmental information available; this assessment has selected information on the basis it may be influenced or affected by the LFRMS. Effort has been made to avoid including baseline information or plans and programmes which are of no clear relevance to the LFRMS.

Table 6-1 - SEA Stages and Work Undertaken

SEA Stages	SEA Tasks	Timescales and Work Undertaken
<b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.</b>	<ul style="list-style-type: none"> <li>• <b>A1:</b> Identifying other relevant policies, plans and programmes, and SEA objectives.</li> </ul>	<p><b>An SEA Scoping Report<sup>1</sup> was prepared and consulted upon for 5 weeks during October and November 2012. The Environment Agency, English Heritage and Natural England are designated as statutory consultation bodies under the SEA Regulations and was consulted on the scope and level of detail of information to be included in the Environmental Report.</b></p> <p><b>An additional LFRMS objective has been identified since the Scoping Report was prepared (objective g in Section 2.3 above), and is considered in this Environmental Report.</b></p>
	<ul style="list-style-type: none"> <li>• <b>A2:</b> Collecting baseline information</li> </ul>	
	<ul style="list-style-type: none"> <li>• <b>A3:</b> Identifying environmental problems.</li> </ul>	
	<ul style="list-style-type: none"> <li>• <b>A4:</b> Developing the SEA objectives.</li> </ul>	
	<ul style="list-style-type: none"> <li>• <b>A5:</b> Consulting on the scope of the SEA.</li> </ul>	
<b>Stage B: Developing and refining options and assessing effects</b>	<ul style="list-style-type: none"> <li>• <b>B1:</b> Testing the plan or programme objectives against the SEA alternatives.</li> </ul>	<p><b>Documented consultation responses relating to the Scoping Report were reviewed and addressed. A list of comments received from consultees,</b></p>
	<ul style="list-style-type: none"> <li>• <b>B2:</b> Developing the Strategic options.</li> </ul>	

<sup>1</sup> Strategic Environmental Assessment of the Southwark Council Local Flood Risk Management Strategy – Scoping Report (Mouchel, October 2012)

SEA Stages	SEA Tasks	Timescales and Work Undertaken
	<ul style="list-style-type: none"> <li>• <b>B3:</b> Predicting the effects of the Draft plan or programme including alternatives.</li> </ul>	<p>along with a description of how each one has been addressed, is provided in Appendix 1.</p> <p>A working draft of the LFRMS was issued to Mouchel for review/appraisal in September 2012. This included a full set of key objectives. A revised Draft for Consultation LFRMS was issued to Mouchel for review in November 2014.</p>
	<ul style="list-style-type: none"> <li>• <b>B4:</b> Evaluating the effects of the Draft plan or programme including alternatives.</li> </ul>	
	<ul style="list-style-type: none"> <li>• <b>B5:</b> Considering ways of mitigating adverse effects.</li> </ul>	
	<ul style="list-style-type: none"> <li>• <b>B6:</b> Proposing measures to monitor the environmental effects of implementing the plan or programme.</li> </ul>	
<b>Stage C: Environmental Report</b>	<ul style="list-style-type: none"> <li>• <b>C1:</b> Preparing the Environmental Report.</li> </ul>	An Environmental Report was produced.
<b>Stage D: Consulting</b>	<ul style="list-style-type: none"> <li>• <b>D1:</b> Consulting on the draft plan and the Environmental Report.</li> </ul>	<p>The SEA Environmental Report was consulted on between November 2014 and February 2015 alongside the LFRMS. It was made available to statutory consultees, as well as being made available to other consultees and the wider public.</p> <p>Responses received on the sustainability effects of the LFRMS and the content of this Environmental Report are considered in this adoption statement.</p>
	<ul style="list-style-type: none"> <li>• <b>D2 (i):</b> Assessing significant changes.</li> </ul>	
	<ul style="list-style-type: none"> <li>• <b>D2 (ii):</b> Appraising significant changes resulting from representations.</li> </ul>	
	<ul style="list-style-type: none"> <li>• <b>D3:</b> Making decisions and providing information.</li> </ul>	
<b>Stage E: Monitoring the</b>	<ul style="list-style-type: none"> <li>• <b>E1:</b> Finalising aims and methods for monitoring.</li> </ul>	Once the LFRMS has been adopted, it is

SEA Stages	SEA Tasks	Timescales and Work Undertaken
<p><b>significant effects of implementing the plan on the environment</b></p>	<ul style="list-style-type: none"> <li>• <b>E2:</b> Responding to adverse effects.</li> </ul>	<p><b>the role of the SEA to ensure that effects of the LFRMS are monitored. This will allow for any unforeseen significant adverse effects of the Action Plan Measures to be detected.</b></p> <p><b>The monitoring methods are outlined in Section 5 of this Adoption Statement.</b></p>



### 6.3 SEA Compliance

Table 6-2 below identifies how the Strategic Environmental Assessment Directive (2001/EC/42) (SEA Directive) has been complied with.

Table 6-2: Compliance with the SEA Directive

Requirements / Where covered in Guide	(Section / Appendix / End notes)
<p>Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):</p>	<p>The SEA Environmental Report</p>
<p>a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;</p>	<p>Section 1 SEA Environmental Report</p>
<p>b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;</p>	<p>Section 4 SEA Environmental Report</p>
<p>c) The environmental characteristics of areas likely to be significantly affected;</p>	<p>Section 4 SEA Environmental Report</p>
<p>d) Any existing environmental problems which are relevant to the plan programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;</p>	<p>Section 4 SEA Environmental Report</p>
<p>e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;</p>	<p>Section 4 SEA Environmental Report</p>

Requirements / Where covered in Guide	(Section / Appendix / End notes)
<p>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);</p>	<p>The SEA Environmental Report</p>
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>The SEA Environmental Report</p>
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>The SEA Environmental Report</p>
<p>i) A description of measures envisaged concerning monitoring in accordance with Article 10;</p>	<p>This Adoption Statement</p>
<p>The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).</p>	<p>The SEA Environmental Report</p>
<p>Consultation:                       Authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4).</p>	<p>Appendix 1 of the SEA Environmental Report and Section 3 of this Adoption Statement.</p>

Requirements / Where covered in Guide	(Section / Appendix / End notes)
<p>Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).</p>	<p>The Draft LFRMS and SEA Environmental Report were made available to the Statutory consultees in March and April 2013.</p>
<p>Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).</p>	<p>N/A</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8).</p>	<p>Appendix 1 of the SEA Environmental Report and Section 3 of this Adoption Statement.</p>
<p>Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted shall be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>• The plan or programme as adopted;</li> <li>• A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>• The measures decided concerning monitoring (Art. 9 and 10).</li> </ul>	<p>This SEA Adoption Statement</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10).</p>	<p>This SEA Adoption Statement</p>
<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).</p>	<p>This Table highlights compliance with the SEA Directive</p>