

**From:** Fraser & Fraser <[REDACTED]>  
**Sent:** 17 March 2025 12:12  
**To:** Richmond Local Plan  
**Subject:** Objection to Proposed Redefinition of Floodplain Boundaries – Eel Pie Island

**Categories:** Consultation Response

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Sirs

I am writing to express my firm objection as a resident and stakeholder of [REDACTED] to the Council's proposed redefinition of floodplain boundaries within the Draft Local Plan. This proposed reclassification poses substantial and unjustified risks to the island's viability, community, and cultural heritage.

Eel Pie Island has established itself as a dynamic community renowned for its distinct combination of residential, commercial, cultural, and recreational uses. Home to artists, skilled boatbuilders, vibrant rowing clubs, family households, and small businesses, the island exemplifies successful mixed-use integration. This multifaceted community not only promotes a strong sense of identity and mutual responsibility among residents but also significantly enhances Twickenham's local economy.

Central to the island's economic and social fabric are institutions like Twickenham Rowing Club and Richmond Yacht Club. Both regularly attract visitors to their well-attended events, directly benefiting local hospitality, catering services, and related sectors. These activities contribute substantially to Twickenham's broader economic vitality, underpinning the interconnectedness of Eel Pie Island with the wider borough.

Additionally, Eel Pie Island supports critical industries, including architecture studios and marine businesses specialising in boatbuilding and repair. Notably, these boatyards represent some of the last remaining operational marine maintenance facilities along the London stretch of the Thames, servicing both commercial and recreational vessels. Their continued existence is vital not only to local economic sustainability but also to regional maritime operations and heritage.

It is important to highlight that Eel Pie Island has remained unaffected by flooding events for over 15 years, primarily due to its advantageous geographical positioning within the actively managed tidal section of the Thames. Flood mitigation measures, such as the Thames Barrier and associated infrastructure, have consistently provided effective protection. Consequently, the proposed boundary change, which seeks to classify the island as part of the functional floodplain, appears to lack both logical and evidentiary support.

Significantly, other islands within the borough that are included within the scope of the Draft Local Plan exist in fundamentally different conditions, being located outside the tidal zone. Their flood risk scenarios are substantially distinct and incomparable to Eel Pie Island's context. This raises further questions about the rationale behind the proposal to subject the island to stringent and damaging floodplain restrictions.

Recent Local Planning Authority decisions indicate an alarming trend toward restrictive practices detrimental to the sustainability and development potential of Eel Pie Island. Previously acceptable permitted developments, including office-to-residential conversions and modest residential improvements, have recently been refused, apparently influenced by the emerging Draft Local Plan policies. If formalised, the proposed floodplain reclassification would exacerbate these issues, effectively immobilising residents and businesses. Properties would become uninsurable, unsellable, and impossible to refurbish or improve legally.

The combined economic, social, and cultural repercussions of this reclassification cannot be overstated. Eel Pie Island has historically contributed to Twickenham's prominence, famously recognised for its significant role in British musical heritage and currently as a lively, thriving community. The proposed changes threaten this vibrant identity, risking irreversible damage to both tangible economic assets and intangible cultural heritage.

In conclusion, the Council's proposal to redefine the floodplain boundaries to include Eel Pie Island is both disproportionate and unfounded. I strongly urge the Council to reconsider and retain the current floodplain designation, safeguarding the future viability, economic resilience, and cultural integrity of Eel Pie Island.

Neil Fraser  
[REDACTED]

Twickenham

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