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**From:** [REDACTED]  
**Sent:** 16 March 2025 10:32  
**To:** Richmond Local Plan  
**Subject:** Draft Local Plan.  
**Attachments:** Policy 8 Draft Local Plan.docx

**Categories:** Consultation Response

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Attached are my comments on the changes proposed in the Draft Local Plan pointing out the serious effect it will have on Eel Pie Island.

Regards,

Colin Heath

Twickenham

14 Mar 2025

## THE EFFECT OF THE DRAFT LOCAL PLAN ON EEL PIE ISLAND

Para 16.66 of the Draft Local Plan States:

“The borough contains a number of islands in the River Thames. Where the access and egress to and from the island begins within the functional floodplain, for the purposes of new development, such islands will be considered and treated as functional floodplain (Zone 3b), even if parts of the islands may be within an area of lower probability of flooding. In line with the guidance set out in the Council’s SFRA, new developments are restricted to ‘Water Compatible’ and ‘Essential Infrastructure’ (subject to an Exception Test) as per the guidance in the Flood Risk and Coastal Change PPG.”

This takes no account of the fact that four of the islands are below Teddington Lock and therefore situated in tidal waters while the remaining six are in non-tidal stretches of the Thames.

This makes a fundamental difference to the nature of any flooding.

In the non-tidal areas flooding is essentially pluvial in nature driven by heavy rainfall in the river’s catchment area. When the floods occur, they persist for extended periods of time, sometime measured in weeks, while the river and its tributaries upstream drain.

Flooding in the tidal areas is caused by a combination of fluvial (tide) and pluvial factors. The effect of this can be seen on the tide gauge at Richmond Lock in terms of the predicted tide height and any surge above that caused by rain water. The crucial difference to the non-tidal stretches is that the tide goes out. There is a short window, at most a few hours rather than days, when the river is at flood levels.



The graph above shows the high tides on 14 Mar 2025. To flood the Embankment at the bottom of Water Lane the sum of the predicted tide height and the rainfall surge on top of that needs to be in excess of 5.1m but it can be seen that for the evening tide in this example the period above this level was less than 30 minutes.

This effect can be seen in recent flooding events.

In the non-tidal areas, there were floods in 2013, a more sustained and deeper flood in 2014 and another flood in 2024. The flooded areas remained under water for extended periods that could be measured in days rather minutes.

Eel Pie Island was unaffected by these floods.

The transient nature of the tidal flooding means that risk to life by denial of evacuation is in fact very low.

The decision to designate areas in Zone 3b as Functional Flood Plain appears to have been taken in private conversations between LBRuT and the EA after the consultation on the Draft Local Plan. The policy change has not been subjected to scrutiny.

The rationale for Eel Pie Island being placed in the functional flood plain is that its access is in Zone 3b. This is simply untrue. Flood mapping clearly shows that both ends of the Eel Pie Island bridge and the greater part of island are in Zone 3a. Presumably the desire to treat all the islands the same caused this reality to be overlooked.

Had there been some consultation and more transparency the differences between the various islands would have become apparent and the illogicality of treating all the islands as being the same would have been revealed.

The four islands in the tidal part of the borough are very different, Glovers Island and Corporation Island are uninhabited, low lying and are only accessible by boat. Swan Island has a road bridge but habitation is only in houseboats. Eel Pie Island is by far and away the most substantial supporting a wide range of mixed uses. There are 50 houses, 20 houseboats, 3 boatyards, a rowing club and a yacht club. It is also located in the centre of Twickenham and is much visited for the wide range of leisure activities, such as boating, yoga, and art activities that it provides.

Likewise, the islands in the non-tidal part are very different in nature.

The nearest equivalent to Eel Pie Island in this area is Platt's Eyot. It has the same Zone 3a access and similar portions of the island is in Zone 3a.

The treatment of the two islands could not be more different.

Platt's Eyot is presently run down but there is a vision that it should be regenerated to provide commercial and residential buildings.

By contrast Eel Pie Island is a much larger, vibrant and busy mix of industrial, commercial and residential uses. However, development or renewal will be effectively prohibited.

The effect of this is already being seen despite the policy not yet being adopted. I [REDACTED] Jacob's Ladder. It is presently a derelict house which is beyond repair. A planning application for a sensitively designed replacement which respected the vernacular of the surrounding buildings and conservation area and was well supported by neighbours has been rejected on the grounds of this unadopted policy.

All properties on the island will experience this stultifying effect. Eel Pie Island will effectively be frozen in time. It will be impossible refurbish or improve properties.

There will also be secondary effects.

Insurance for existing properties is already high. This change of policy will ensure that it will very difficult or even impossible to obtain insurance and costs of any insurance offered it very likely to be unaffordable.

It will effectively prevent raising mortgages.

The change of flood zone definition will not affect the other three islands in the tideway but will have a very deleterious effect on Eel Pie Island without any justification.

This is a major unjustified change with serious implications for Eel Pie Island.

The Island, which does not flood, and is a vibrant part of central Twickenham will be blighted.