

**From:** Doug Garrett <[REDACTED]>  
**Sent:** 17 March 2025 12:00  
**To:** Richmond Local Plan  
**Subject:** Objection to MM44 – Flood Zone Classification of Eel Pie Island

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[REDACTED] Twickenham [REDACTED]

Dear LBRUT,

### **Objection to MM44 – Flood Zone Classification of Eel Pie Island**

I am writing to express my concern regarding **MM44** in the proposed **Local Plan** which, I believe, would adversely affect **Eel Pie Island**.

While the Island has historically been considered **Flood Zone 3b** it was been treated as **Flood Zone 3a** from 2010 see: -

**“2010 Update:** The Strategic Flood Risk Assessment (SFRA) Level 1 Update reclassified Eel Pie Island from **Flood Zone 3b (Functional Floodplain)** to **Flood Zone 3a (High Probability)**. This change was based on updated flood modeling by the Environment Agency, reflecting a high probability of flooding (annual probability of 1% or greater) but not functioning as a natural floodplain.”

However, the SFRA changed in 2016 See: -

**“Update 2016 Assessment:** Contrarily, the SFRA Update in 2016 designated Eel Pie Island as **Flood Zone 3b (Functional Floodplain)**. This designation was due to the access and egress routes to and from the island via a pedestrian footbridge, which, along with the Twickenham Embankment side, is also designated as functional floodplain Zone 3b.”

It is only recently that the planning department has begun applying the Flood Zone 3b constraints to planning applications. In practice, multiple applications—including those for my property—have been assessed as if the land were in Flood Zone 3a, which should be its actual classification based on: -

- **Definitive Aurora mapping**, which confirms access to the Island as Flood Zone 3a.
- **Elevation data**, which further supports this classification.

Even if access to Eel Pie Island were considered Flood Zone 3b, the Island itself should not be treated in the same manner as non-tidal Thames islands. Given the tidal nature of the area, the presence of effective tidal/fluviat floodplains, and the fact that floodwaters drain naturally with each ebbing tide, it is illogical to apply a blanket Flood Zone 3b designation.

Reclassifying **Eel Pie Island as a functional floodplain**—suggesting it is intended to store and carry floodwater—is plainly incorrect. Such a designation would impose **unjustified restrictions** on residents' rights, **create unnecessary difficulties in obtaining insurance**, and **fail to reflect the island's actual flood risk**.

I urge the Council to reconsider MM44 and ensure that Eel Pie Island is classified appropriately as Flood Zone 3a, based on its real-world characteristics rather than an erroneous historical designation.

Yours sincerely,

