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**From:** Celia Holman <[REDACTED]>  
**Sent:** 16 March 2025 23:43  
**To:** Richmond Local Plan  
**Subject:** Local Plan MM44  
**Attachments:** Local Plan MM44.pdf  
  
**Categories:** Consultation Response

Dear Sir/Madam,

Please find attached with reference to MM44.

Thank you in advance, and with my best wishes,

Celia Holman

[REDACTED] Twickenham [REDACTED]

Dear Sirs,

I am writing to formally object to the proposed modifications under Policy 8 (MM44) of the Local Plan, most specifically the redefinition of the functional floodplain.

I am requesting that the definition of the functional floodplain should remain unchanged.

Additionally, it is also essential that it is corrected that the access to Eel Pie Island is in Flood Zone 3a - and not Flood Zone 3b as has been repeatedly stated by the Council. Its own maps, and those of the EA, show that this is not the case.

Please see the objection lodged by Valerie Johnson on behalf of Henry Harrison for more detail on the above, and on other matters relating to MM44.

The error regarding the access to Eel Pie Island has gone unnoticed and therefore unchallenged for several years as - until very recently - it had not affected the LPA granting planning permission on the island for residential developments, and for the change of use from office/commercial to residential.

I was present at the Public Inquiry in June/July 2024 but was unable to speak as I had not responded to the public consultation in June 2023.

The redefinition of the functional floodplain had not yet been proposed by the EA during the public consultation in June 2023. It first emerged in a Statement of Common Ground between the Council and the EA in late April 2024. This was extremely frustrating as the Public Inquiry would have afforded a very appropriate forum in which to raise our significant concerns.

The proposed redefinition of the functional floodplain will have a profoundly negative impact on Eel Pie Island. Eight of borough's nine other islands will be largely unaffected, with the exception of Platt's Eyot, the island most comparable to Eel Pie Island in both size and due to the fact that its access and most of the island itself is located in Flood Zone 3a. Platt's Eyot is addressed in Site Allocation 2 of the Local Plan, in which it is being proposed to introduce residential use in order to underpin regeneration plans for the island. This is entirely at odds with the restrictions that would result from the proposed redefinition of the functional floodplain.

The borough's islands are located in both tidal and non-tidal waters. This has not been taken into consideration. Flooding in tidal waters rapidly subsides on the turn of the tide. Any 'threat to life' to residents is very short-lived, a matter of hours.

Property and business owners on Eel Pie Island have long been aware of and adapting to the potential for flooding. Both active and passive flood defences have been literally landscaped into the fabric of the island, something that can not be appreciated by looking at a flat plan or a Googleearth view. Many of the properties are also built raised up, so whilst the island itself might be in Flood Zone 3a, many properties sit raised at least a metre in most cases above this.

Some background to my objection:

I have lived on [REDACTED] since [REDACTED], and owned a property here since [REDACTED].

We are a small and tight knit community. We have two island organisations - the Eel Pie Island Association and the Island Bridge Company - under the umbrella of which we plan and organise to ensure the ongoing viability of the island. One recent example is the installation (the cost being met collectively by island residents and businesses) of an island-wide dry riser with multiple standpipes to which firefighters can attach hoses.

As islanders, we similarly fully appreciate the potential threat posed by flooding, and have been actively mitigating against it for decades, as already referenced.

In addition, there are multiple boats on the island to organise - in the highly unlikely event it were needed - an island evacuation. There are designated gathering places from which such an evacuation could place. There are many skilled boat handlers on the island. The island's response to any 'threat to life' would be an active and not a passive one.

And the LPA has previously recognised this and planning permissions for development and redevelopment and changes of use have been approved. The island has been allowed to adapt and change and remain viable and vital.

During the time 10+ years that I have lived on the island, I have seen many changes. A large boatyard site has been rebuilt to provide a mixed use premises of office space and residential, whilst also retaining its river moorings, which provide a mixture of overflow office space and residential on boats moored there.

Across the island, many residential properties (former seasonal chalets, for example) have been either extended or rebuilt, to provide more sustainable, year-round, family accommodation.

Both the Rowing and Yacht clubs have extended their premises, and increased their membership.

And the island continues to experience change. More recently, once fully occupied offices on the island now lie in part empty, as indeed they do in central Twickenham and across the borough. The demand for self-contained, premium offices has changed.

Against this background, Richmond Council is in the process of converting a substantial part of its Civic Centre (located a matter of minutes' walk from Eel Pie Island) into 'for rent' office space.

There is a large riverside development planned for Twickenham Embankment (the developer is Richmond Council), with office space included within it, too.

The changing demand for office space and different types of office space is precisely the 'challenge' that Eel Pie Island, in the past, has been able to adapt to address. That is, up until now, with the proposed redefinition of the functional floodplain.

Changes of use from office to residential (allowed under permitted development rights) are now being refused, against the background of the emerging Local Plan.

This has also been the case for a recent relatively modest residential redevelopment that would previously have been approved by the LPA.

The borough is failing to meet its housing quota and yet residential development - where it would previously have been approved - is now being rejected. And yet the actual risk has not changed.

Eel Pie Island has a bi-annual 'open studios' event - literally 1000s of people visit from all over London and beyond. They come to see a vibrant community where people have been able to live, work and thrive over the centuries, the island having been able to adapt to change. This is not an island 'in special measures', with derelict sites and freeholders struggling in the face of viability challenges.

The proposed change to the definition of the functional floodplain - for which no material justification has been offered and against the background of a factual error regarding the access to the island being located in Flood Zone 3a - will significantly impact the island's sustainability.

I am therefore requesting that:

1. the proposed redefinition of the functional floodplain not be adopted
2. the existing definition (Flood Zone 3b) be retained
3. The incorrect classification of Eel Pie Island's access being located in Flood Zone 3b be corrected to Flood Zone 3a.

A Local Plan is precisely that - local. It needs to take into account specificity of place and unique circumstances. The proposed redefinition of the functional floodplain is a borough-wide proposal that is materially contrary to this. There is indeed a strong case to be made that Eel Pie Island should have its own Site Allocation going forward.

Thank you for your consideration in these matters, and with my best wishes

Celia Holman

Twickenham