

From: Clive Chapman <[REDACTED]>
Sent: 14 March 2025 14:43
To: Richmond Local Plan
Subject: Objection to Proposed Changes in Local Plan - Policy 8 (flood Risk and Sustainable Drainage)

Categories: Consultation Response

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Dear Sir/Madam

I am a long term resident of [REDACTED] and have run an architects practice on the Island since January 1981. As a practice we have been responsible the design and construction of many properties on the island including five new build houses, the complete remodelling of two houses, full planning approval for a house, and the ongoing design of a further new house.

I formally object to the proposed modifications under Policy 8 (Modification no. 44) of the London Borough of Richmond upon Thames Schedule of Proposed Main Modifications, dated 31.01.25 (https://www.richmond.gov.uk/media/4iwfsa5o/psed_08_schedule_of_proposed_main_modifications_january_2025.pdf), with the redefinition of the Functional Floodplain as "land riverward of the Thames Tidal Flood Defences", which would change the Island form being in Flood Zone 3a to Flood Zone 3b.

Existing Policy LP 21 of the Local Plan (2018), and Emerging Policy 8 state that:

"The borough contains a number of islands on the River Thames. Where the access and egress to and from the island is 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."

Existing Policy LP of the Local Plan (2018) 21 states:

"Redevelopment of existing developed sites will only be supported if there is no intensification of the land use and a net flood risk reduction is proposed; any restoration of the functional floodplain will be supported."

Emerging Policy 8 as it stands, states:

"Redevelopment of existing developed sites will only be supported if there is no additional built development proposed within the undeveloped functional floodplain, no increase in vulnerability and a net flood risk reduction is proposed; any restoration of the functional floodplain will be supported."

This change in the Emerging Local Plan to specifically make reference to *no additional development* and that the Island will actually be reclassified as Functional Flood Plain has already resulted to planning refusals. Until recently, planning applications on Eel Pie Island have been granted for an increase in floor area (e.g. Planning ref 19/1855/HOT The Moorings – "Single storey rear extension, rear dormer roof extension and a rear roof terrace.....") Since the proposed modification to change the whole Island to 3b, a planning application for a replacement dwelling with no increase in bedrooms, but a small increase in floor area, has been refused, contradicting previous decisions.

Specific Objections

Flood Zone Reclassification

Redesignating the entire Island as Flood Zone 3B does not take into account actual ground levels and existing flood defences that were constructed by the GLA in the late 1970s and early '80s. These defences and ground levels correctly designate the Island as Flood Zone 3a.

Policy wording

Introduction of the words, 'no additional built development proposed within the undeveloped functional floodplain'

Development Prevention

These policies will effectively prevent any new homes that would be designed to have floor levels that meet 1 in 100 year plus climate change, be flood resilient, have foundations that result in no loss of floodplain, or are built as sustainable construction with zero carbon footprint. The result will mean that a thriving ongoing upgrading of the built environment will end.

Insurance

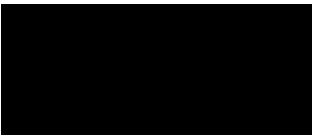
Redefining the Island as Functional Floodplain will increase insurance premiums or possibly insurance unavailable, and make mortgages and property loans harder to obtain, which in turn, will decrease property values and lead to a general decline investment.

Egress from the Island is via a footbridge (Flood Zone 3a) across a short (20m) section of Flood Zone 3b to higher ground on Twickenham Embankment (Flood Zone 3a). This short section of Flood Zone 3b is in the Tidal Thames, so that during an extreme event, flooding is only a matter of hours and not days. These proposed modifications offer no benefits, but only unnecessary negative impact on a residential and business community that know and understand the river.

Yours faithfully

Clive Chapman

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