

**From:** Andrea Plos <[REDACTED]>  
**Sent:** 10 March 2025 17:43  
**To:** Richmond Local Plan  
**Cc:** [REDACTED]  
**Subject:** Objection to Proposed Changes in Local Plan – Policy 8 (Flood Risk and Sustainable Drainage)

**Categories:** Consultation Response

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Dear Sirs,

I am writing to formally object to the proposed modifications under Policy 8 of the Local Plan, particularly the redefinition of the functional floodplain as outlined in MM44. The reclassification of all land “riverward of the Thames Tidal Flood Defences” as functional floodplain (Zone 3b) is deeply concerning due to its widespread and unnecessary negative consequences for Eel Pie Island and other affected areas.

Key Concerns:

#### 1. Inaccurate Flood Zone Classification

The reclassification in MM44 does not reflect the actual flood risk of Eel Pie Island. The current designation of most of the island in Flood Zone 3a aligns with established flood risk assessments, and the proposed shift to Zone 3b is not supported by consistent evidence. Moreover, the assumption that all borough islands have access points in Flood Zone 3b is demonstrably incorrect. This broad-stroke redefinition disregards the unique topography and risk levels of each location.

#### 2. Severe Impact on Property Development and Adaptation

The proposed policy will severely limit property owners' ability to undertake necessary extensions, conversions, or developments that have historically allowed Eel Pie Island to remain a thriving and sustainable community. The functional floodplain classification will introduce unjustified planning restrictions that make future adaptation impossible, reducing the island's long-term viability.

#### 3. Negative Financial and Insurance Implications

Reclassifying Eel Pie Island as part of the functional floodplain will have an immediate and detrimental effect on the financial security of its residents and business owners. The ability to secure mortgages and business loans will be greatly diminished, with banks and insurers likely to withdraw support due to increased flood risk categorization. Insurance costs will rise sharply, while some properties may become uninsurable altogether, making ownership and investment unsustainable.

#### 4. Lack of Proper Consultation and Justification

The process by which MM44 was introduced raises serious procedural concerns. The modification was not included in the original public consultation of the Local Plan and emerged only after discussions between the council and the Environment Agency. Stakeholders were given no opportunity to challenge this significant change during the formal consultation process. Additionally,

no clear justification has been provided as to why this redefinition is necessary, nor has any supporting data demonstrated that such a change is required for flood risk mitigation.

### A More Reasonable Approach

Instead of proceeding with this ill-advised reclassification, the council should consider a more nuanced and evidence-based approach that recognizes the unique characteristics of Eel Pie Island and other affected areas.

Retain the existing definition of the functional floodplain as Flood Zone 3b rather than adopting a sweeping reclassification that fails to account for site-specific conditions.

Recognize that Eel Pie Island has historically been granted exceptions from strict functional floodplain regulations due to its unique circumstances and should continue to be treated accordingly.

Introduce site-specific assessments rather than applying a blanket policy that disproportionately impacts some areas while leaving others unaffected. This would align with past approaches taken in other boroughs.

### Conclusion

This modification, if implemented, will cause unnecessary harm to residents, businesses, and the broader community without offering any tangible flood risk mitigation benefits. The proposed changes lack both procedural fairness and substantive justification. I strongly urge the council to reject MM44 and instead adopt a more balanced approach that supports responsible development while maintaining appropriate flood risk management.

I would welcome the opportunity to discuss this matter further and look forward to your response.

Best regards,

Andrea Plos

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