

From: Jack Garrett-Jones <[REDACTED]>
Sent: 14 March 2025 21:20
To: Richmond Local Plan
Subject: Objection to Proposed Changes in LBRuT Local Plan – Policy 8 (Flood Risk and Sustainable Drainage)

Categories: Consultation Response

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Dear Council Members,

I am writing to express my deep concern regarding the current flood zone designation of Eel Pie Island and the recent policy shift that now enforces this classification without the pragmatic considerations previously applied. This approach is fundamentally flawed for the following reasons:

1. Erroneous Original Classification as Flood Zone 3b

The initial designation of Eel Pie Island as Flood Zone 3b—indicative of functional floodplain—was based on an inaccurate assessment of the island's flood risk. The island itself is situated above the levels typically associated with Zone 3b and does not serve as a natural floodplain where water must flow or be stored during flood events. Historical data indicates that the mainland side of the island footbridge experiences only brief tidal flooding, lasting approximately an hour, a few times per year. This limited exposure does not meet the criteria for a Zone 3b classification, which is reserved for areas with a high probability of flooding, specifically those expected to flood with an annual probability of 5% or greater. Therefore, Eel Pie Island should be more accurately classified as Flood Zone 3a, reflecting a high probability of flooding but not functional floodplain status.

2. Misguided Policy Shift Based on Access Point Flooding

The recent policy change to strictly enforce the misclassification of Eel Pie Island as Zone 3b is primarily justified by the susceptibility of the footbridge's access point on the Twickenham Embankment to flooding. While it is acknowledged that the Embankment is designated as functional floodplain (Zone 3b), this external factor should not dictate the classification of the entire island. Access points are separate from the island's landmass and should be addressed independently. Penalizing the island's residents and businesses by enforcing an inappropriate Zone 3b designation due to external access issues is unjust and illogical.

3. Departure from Previously Pragmatic Approach

Historically, the council adopted a pragmatic approach by treating Eel Pie Island as Zone 3a, acknowledging the island's specific circumstances and mitigating potential negative impacts on property insurance and development opportunities. This balanced approach considered both the safety concerns associated with access during floods and the practical implications for residents and businesses on the island. The recent shift to enforce the erroneous Zone 3b classification disregards this nuanced understanding and imposes undue restrictions without clear justification.

4. Inconsistency with Strategic Flood Risk Assessment (SFRA) Guidelines

The council's own SFRA emphasizes the importance of considering local circumstances and not defining functional floodplain solely based on rigid probability parameters. By focusing narrowly on the footbridge's susceptibility to flooding, the council is applying a rigid interpretation that contradicts the SFRA's guidance for a more holistic assessment. This approach fails to account for

the actual flood risk to the island's properties and overlooks the resilience measures that residents and businesses have implemented over the years.

5. Adverse Impacts on the Community

Enforcing the misclassification of Eel Pie Island as Zone 3b imposes significant restrictions on development in times of a housing crisis. Such a designation fails to reflect the actual flood risk to the island's properties and overlooks the resilience measures that residents and businesses have implemented over the years. This policy shift undermines the community's stability and prosperity without delivering corresponding benefits in flood risk management.

6. Contradiction to Central Government's Pro-Growth Planning Objectives

The central government has emphasized the need for a pro-growth and pro-infrastructure planning system to stimulate economic growth. The Planning and Infrastructure Bill is central to the government's plan to expedite the delivery of new homes and critical infrastructure, supporting the goal of building 1.5 million safe and decent homes in England and fast-tracking 150 planning decisions on major economic infrastructure projects by the end of this Parliament. The current misclassification of Eel Pie Island as Zone 3b, leading to unnecessary planning obstacles, directly contradicts this objective by hindering appropriate development and economic activity on the island.

The Council Must Reverse This Policy and Adopt a Sensible, Evidence-Based Approach

Given the serious flaws in the Council's decision and its harmful consequences, I urge LBRuT to:

- A. Correct the flood zone classification of Eel Pie Island** to reflect that it is in **Flood Zone 3a**, not 3b.
- B. Separate flood zone designation from access concerns** and, if necessary, consider **infrastructure improvements to the Twickenham Embankment** rather than applying an inappropriate blanket classification.
- C. Reinstate the previous pragmatic approach** that allowed Eel Pie Island to develop in a sustainable manner, ensuring that planning restrictions remain proportionate to actual flood risk.
- D. Engage with affected residents and businesses** to fully assess the economic consequences of this policy shift before implementing changes that will harm livelihoods.
- E. Align local planning policy with national objectives** by ensuring that flood risk policies do not unjustifiably obstruct investment and economic growth.

By adopting a more informed and balanced approach, the council can ensure that flood risk management policies are both effective and reasonable, fostering a thriving and resilient Eel Pie Island community while supporting broader economic growth objectives.

Sincerely,

J Garrett-Jones

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Twickenham