

From: Melanie Riach <[REDACTED]>
Sent: 16 March 2025 23:40
To: Richmond Local Plan
Subject: Objection to Local Plan Eel Pie flood zone MM44

Categories: Consultation Response

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Richmond planning,

Please accept this letter as an objection to the changes in the Local Plan. I wish to make a representation on MM44 (additional wording to Draft Local Plan highlighted in bold below). With reference to Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), and its effect on Eel Pie Island.

Paragraph 16.66: The borough contains a number of islands in the River Thames. Where the access and egress to and from the island begins 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. For the River Thames, the functional floodplain is defined as land riverward of Thames Tidal Flood Defences. In line with the guidance set out in the Council's SFRA [Strategic Flood Risk Assessment], new developments are restricted to 'Water Compatible' and 'Essential Infrastructure' (subject to an Exception Test) as per the guidance in the Flood Risk and Coastal Change PPG.

The functional floodplain is currently defined as Flood Zone 3b. Currently the majority of Eel Pie Island is not in the floodplain. This change in wording, would mean that all of Eel Pie would be considered to be in the floodplain. This would have a huge negative effect on island life and the draw to Twickenham that the island brings.

Businesses and a community thrive on the island and the rich history is maintained and the community continues to develop and prosper. This change would make insurance and mortgages either extremely expensive or not obtainable at all. Development in the area would be significantly negatively effected and planning applications for simple changes to existing properties would be, for no one's benefit impeded. Worst case scenario, properties could not be remortgaged, people lose their homes and life savings. The point of policy is to build sustainably and protect communities. This policy change would do exactly the opposite. The UK has a housing shortage, the economy is on its knees and making planning changes on existing communities that stops progress or people improving their homes and businesses is only further detrimental to both of these.

There has been a lack of proper consultation on the matter, the manner in which the policy wording was added at a later date, did not allow the community to be consulted or involved in the discussions and data does not support why this change has been suggested.

The access or egress being in the flood zone on this island could very easily change. The new development of Water Lane and King St, will result in changes in levels in foot paths as the road is dug up and relayed. It would be very easy to heighten the very small strip that floods around the bottom of the bridge and then it would not flood at high tide. This very simple change in typography, would mean

it would not be in the functional flood plain and therefore it would not be a risk of people losing their homes due to insurance and no re-mortgages not being issued (if this policy were to come into force).

I currently live on [REDACTED] and aspire to purchase a property on the island. Living on [REDACTED] and working from home, I see the daily backup of traffic at high tide as people are scared to drive their cars (sometimes SUVs) through inches of water. I then watch people walk in wellies through the water, not difficult. It is people that do not understand the water levels that cause issues for local people who have no issue living on the Thames with its tides. This appears to be an example of a policy that does not understand local situations and makes things worse for local people, not safer or better. This policy could mean that I can not get a mortgage or insurance on the island, or worse, I get one now, purchase and it can not be renewed and I lose my life savings as the bank repossesses a property that they will not let me mortgage again. I would be a younger generation that would sustain the life and culture on the island, this policy would stop me, others and the island's future prospering.

Please rewrite the policy wording to consider the above, protect the existing and future Island's community that is so vital to housing stock and London's culture.

Best wishes,
Melanie Riach

[REDACTED]
[REDACTED]