

Planning Policy Team
London Borough of Richmond upon
Thames
Sent by email.

Our ref:SL/2007/100791/CS-08/SB1-
L02
Your ref: Main modifications
Date: 17 March 2025

Dear Planning Policy Team,

London Borough of Richmond upon Thames – Consultation on Proposed Main Modifications to the Local Plan from 31 January to 17 March 2025

Thank you for consulting us on the proposed main modifications to your local plan.

Environment Agency Position

We are satisfied that, with the proposed modifications, the plan remains sound in line with the requirements of Paragraph 36 of the National Planning Policy Framework (NPPF).

MM3- 3.3 Strategic Objectives, 6. Increasing biodiversity and the quality of our green and blue spaces, and greening the borough

We are pleased to note that this section has been updated to reference to natural flood management, in line with the proposed modifications made at the statement of common ground stage.

MM32 -Policy 3 Tackling the Climate Emergency (Strategic Policy), Part D

MM34 -Policy 6 Sustainable Construction Standards, Part A 4.

MM47- Policy 9 Water Resources and Infrastructure (Strategic Policy), Paragraph 16.92

We are pleased to note references added to improve water efficiency in these modifications (MM32,34 & 47). The London Borough of Richmond upon Thames has been classified as an area of serious water stress and that there is limited water resource availability, along with demand and supply issues as set out in Water Companies Water Resource Management Plans (WRMP's).

MM35 - Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Part A

We note that modifications made to this policy are in line with those agreed as part of our [statement of common ground](#) (dated 31 January 2025).

Further clarity has been added with respect to requirements for flooding from fluvial and tidal sources, which fall within the Environment Agency's remit, and other sources which are the responsibility of the Lead Local Flood Authority (LLFA).

MM37 - Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Part D, and Paragraph 16.70

We note that this modification is in line with previous comments we provided and provides clarity around suitable flood risk mitigation measures for different sources of flooding.

MM39 - Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Part J

This proposed modification clarifies that a raising strategy to Thames Estuary 2100 (TE2100) may be required as part of proposed developments. Whilst we would encourage developers to raise to TE2100 levels as part of the development, if this is not possible we would ask to see a strategy detailing how defences could be raised to the relevant TE2100 levels in the future, with the development in place.

MM40 - Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Part L

This modification (removal of reference to the central allowance) ensures that the plan is consistent with nationally published guidance on selecting climate change allowances for different "Flood Risk Vulnerability" classifications of development

[Flood risk assessments: climate change allowances - GOV.UK](#)

MM42 - Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Paragraph 16.80

We are pleased to note that reference to the Thames Estuary 2100 [Riverside Strategy approach](#) has been added.

MM44 - Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Paragraph 16.66

It is the responsibility of the Local Authority to define flood zone 3b. Defining land riverward of tidal defences is, in our view consistent with the Planning Practice Guidance for Flood Risk and Coastal Change, [Table 1: Flood zones](#), which states *"the identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters"*.

MM69 Policy 40 Rivers and River Corridors, Part A

MM70 Policy 40 Rivers and River Corridors, Paragraph 21.89

MM71 Policy 40 Rivers and River Corridors, Paragraph 21.92

We support the inclusion of additional wording in these modifications (MM69, 70 & 71), which provide clarification around the desired outcomes for improving water quality and biodiversity in the riparian zone, as part of development.

We would be happy to meet to discuss any section of this response, please contact us if this was something you would like to arrange.

Yours sincerely,

George Goodby
Sustainable Places Planning Specialist

E-mail kslplanning@environment-agency.gov.uk