

**From:** Nicola Cooper <[REDACTED]>  
**Sent:** 14 March 2025 17:14  
**To:** Richmond Local Plan  
**Cc:** Nikky Cooper  
**Subject:** OBJECTION to Change of Flood Plain Definition

**Categories:** Consultation Response

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

Dear Planning Inspectors,

I am writing to express my absolute outrage at the proposed redefinition of the functional floodplain, which is based on flawed and incorrect data (Eel Pie Island is wrongly assigned to Zone 3b, when in fact it is, and always has been, Zone 3a - and the access and egress is clearly in Zone 3a).

Change Ref.	Section of the Plan	Page	Proposed Modification & Reason for change
MM44	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Paragraph 16.66	207	<p>[See also Statement of Common Ground with the Environment Agency (signed 18/04/2024 and updated 28/06/2024) (SOCG-08)] For clarification, amend the reference in the supporting text to the functional floodplain to include land riverward of flood defences:</p> <p>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 the Thames Tidal Flood Defences. In line with the guidance set out in the Council's SFRA, 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.</p>

This change has been brought in very late in the proceedings and hence avoided all chance of debate or objection, and will have devastating consequences for Eel Pie Island. This reckless and ill-conceived change (or is it an erroneous error?) would effectively cripple the island's ability to function, putting residents and businesses at serious financial and practical risk.

Eel Pie Island is in tidal waters, yet this critical factor has been completely ignored in the broad-brush, one-size-fits-all approach being taken. The proposal would strip away existing planning rights, making it nearly impossible to get permission for even the most basic extensions or changes of use. This will prevent the island from evolving and adapting—something it has done successfully for centuries.

Beyond this, the reclassification will directly impact property values, mortgage availability, and insurance costs. Lenders are already turning away from so-called high-risk areas, and this unnecessary change will make financing homes and businesses far more difficult, if not impossible. The local economy—particularly river-based businesses such as boatyards—will take a massive hit, all because of an arbitrary, illogical decision that contradicts established floodplain definitions used across other London boroughs.

Let's be clear: this is not about actual flood risk, which remains unchanged. It is a bureaucratic nightmare being imposed without proper justification. The vast majority of the borough's islands are unaffected, yet Eel Pie Island—the largest and most economically active—is being unfairly included. Unfortunately no one from the council lives on Eel Pie Island otherwise this cavalier action to devastate peoples lives and businesses would never have happened - so much for the elected council looking after its constituents.

This redefinition is unnecessary, harmful, and completely disconnected from reality. The existing definition of the functional floodplain must be retained, or at the very least, Eel Pie Island must be granted an exception, as has been done before. If this disastrous policy goes ahead, the responsibility for the damage caused—financially and structurally—will rest squarely on the shoulders of those who pushing it through without due consultation and preventing interested parties from even speaking out.

I am hopeful that this error in flood classification of Eel Pie Island can be corrected before irreversible harm is done. I expect a response explaining how you intend to rectify this situation.

Sincerely,

Mrs Nicola Cooper