

**From:** Maher Maksoud <[REDACTED]>  
**Sent:** 14 March 2025 15:45  
**To:** Richmond Local Plan  
**Subject:** Formal Objection to Main Modification 44 – Proposed Redefinition of Functional Floodplain

**Categories:** Consultation Response

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Dear Planning Inspectors,

I am writing to formally object to the proposed amendment under Main Modification 44 (MM44) of the London Borough of Richmond upon Thames Draft Local Plan, specifically the redefinition of the functional floodplain as encompassing all land “riverward of the Thames Tidal Flood Defences.” As Maher Maksoud, the owner of [REDACTED], a residential property located on [REDACTED], Twickenham, [REDACTED], I submit that this modification will impose significant and unwarranted adverse impacts on my property and the broader island community. I respectfully request that my concerns be given due consideration prior to the deadline of March 17, 2025.

## Grounds for Objection

Formal Objection to Main Modification 44 – Proposed Redefinition of Functional Floodplain 1.

**Inaccurate Representation of Flood Risk**The proposed reclassification of Eel Pie Island as entirely within Flood Zone 3b (functional floodplain) is not supported by a robust evidence base. Existing flood risk assessments, including those reflected in the Aurora Mapping System, designate the majority of the island, including my property at [REDACTED], as Flood Zone 3a. Furthermore, the assertion that the island’s access via the footbridge lies within Flood Zone 3b is factually incorrect, as both ends of the bridge are situated in Flood Zone 3a. The tidal nature of flooding on the island is predictable and rapidly subsiding, rendering the blanket designation as functional floodplain disproportionate and unjustified.

**2. Undue Restriction on Property Development**As a property owner, I have previously undertaken an extension to [REDACTED] with the approval of the local planning authority, a decision consistent with the island’s historical capacity to adapt responsibly to changing needs. The adoption of MM44 would preclude such future modifications, including minor extensions or conversions, by imposing stringent planning restrictions applicable to functional floodplains. This would severely curtail my ability—and that of other residents—to maintain and enhance our properties, thereby undermining the long-term sustainability of Eel Pie Island as a viable community.

**3. Significant Financial and Insurance Implications**The redefinition of the island as functional floodplain would have profound financial repercussions for property owners, including myself. Securing mortgages or loans against properties such as [REDACTED] would become markedly more difficult and costly, as lending institutions increasingly restrict financing for areas perceived as high-risk. Similarly, property insurance premiums would rise substantially, and in some instances, coverage may become unattainable. These consequences threaten the economic stability of residents and the viability of property ownership on the island, absent any corresponding increase in actual flood risk.

**4. Procedural Irregularities and Insufficient Justification**The manner in which MM44 has been introduced raises serious concerns regarding transparency and fairness. This modification was not subject to public consultation during the Draft Local Plan’s initial stages in 2023 and emerged only subsequent to a closed meeting between the council and the Environment Agency in March 2024.

Efforts by island residents, including myself, to raise objections during the June 2024 Public Inquiry were disallowed, leaving this current consultation as the sole opportunity for representation. Moreover, neither the council nor the Environment Agency has provided a clear rationale or empirical justification for this redefinition, rendering it an arbitrary imposition on affected stakeholders.

### **Proposed Resolution**

In light of the foregoing, I respectfully urge the Planning Inspectors to adopt a more balanced and evidence-based approach:

- **Retain the Existing Definition:** The current designation of the functional floodplain as Flood Zone 3b should be preserved, consistent with practices across other London boroughs and reflective of the actual flood risk profile of Eel Pie Island.
- **Grant an Exception for Eel Pie Island:** Alternatively, an exception should be explicitly incorporated for Eel Pie Island, as has been precedent in prior Strategic Flood Risk Assessments, to safeguard its capacity for sustainable adaptation.
- **Adopt Site-Specific Assessments:** Rather than applying a uniform policy, the council should assess each island individually, acknowledging their distinct characteristics and flood risk profiles.

### **Conclusion**

The implementation of MM44 would inflict unnecessary harm upon the residents and property owners of Eel Pie Island, including myself, without delivering commensurate benefits in flood risk management. As the owner of [REDACTED], I am deeply invested in the continued vitality of this unique community, which this modification jeopardizes through its restrictive and poorly substantiated provisions. I implore you to reject MM44 in favor of a policy that supports responsible development and preserves the island's economic and social fabric.

I would be grateful for the opportunity to discuss this matter further and appreciate your attention to this objection.

Yours faithfully,

Maher Maksoud

[REDACTED]  
Twickenham, [REDACTED]  
[REDACTED]

Sent from mobile. Please excuse errors.