

From: Emma Burke <[REDACTED]>
Sent: 14 March 2025 15:43
To: Richmond Local Plan
Subject: Objection to Proposed Floodplain Reclassification – Eel Pie Island

Categories: Consultation Response

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Dear Sir/Madam,

I am writing as an office occupier at [REDACTED], to formally object to the proposed modification altering the floodplain status of Eel Pie Island. As someone with professional experience in planning, I strongly oppose this change due to its unwarranted and harmful consequences for the Island and its community.

Having reviewed the planning report by Valerie Scott Planning on behalf of Henry Harrison, I share the concerns outlined, particularly regarding the flawed classification and the lack of proper consultation.

Primary Concerns

Incorrect Floodplain Classification

Currently, only 5% of Eel Pie Island is designated as functional floodplain (Zone 3b), while the remaining 95% falls under Zone 3a.

The proposed modification would reclassify the entire Island as Zone 3b, leading to excessive planning restrictions that would negatively impact property development, financing, and insurance.

Lack of Transparency and Public Engagement

The decision was made behind closed doors in a private meeting between LBRUT and the EA on March 19, 2024, without any public consultation.

The absence of public input contradicts fundamental principles of transparency and fair planning processes.

Overlooking Key Considerations

The financial and developmental consequences for Eel Pie Island's residents and businesses have been ignored.

No clear rationale has been provided for departing from the standard approach followed by other London boroughs.

Errors in the Draft Plan

The plan incorrectly assumes that all affected islands lack safe access and egress, despite 95% of Eel Pie Island being in Zone 3a.

This fundamental inaccuracy calls into question the validity of the proposed reclassification.

Unfair and Inconsistent Policy Application

Other London boroughs classify only functional floodplains as Zone 3b, making LBRUT's approach an outlier with no justification.

The EA/LBRUT Statement of Common Ground misleadingly refers to this major change as a "minor modification," misrepresenting planning policy.

Lack of Sound Planning Justification

Planning policies should serve the public interest, yet no valid reasoning has been provided for this modification.

Conclusion

This modification should be rejected because:

It would cause unnecessary and significant harm to Eel Pie Island and its community.

It was introduced without transparency or meaningful public engagement.

It represents an unjustified and inconsistent approach compared to other London boroughs.

It is based on flawed data and lacks a legitimate public interest justification.

I urge the authorities to reconsider this proposal and ensure a fair, evidence-based planning process.

Best,

Emma Burke | Lettings Director

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