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Sent: 17 March 2025 15:14
To: Richmond Local Plan
Subject: Objection to the Functional Floodplain classification of Eel Pie Island MM44
Categories: Consultation Response

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Dear LBRUT

I am writing to formally object to the recent policy shift by the LBRUT regarding the flood zone classification of Eel Pie Island.

This change, which effectively enforces an incorrect categorisation of the island as Flood Zone 3b (functional floodplain), is fundamentally flawed, lacks transparency, negatively impacts the island's economic viability and directly contradicts national policy objectives on sustainable development and economic growth, as follows:

Flawed justification based on access rather than risk

The justification for this change appears to be that the footbridge leading to Eel Pie Island has its access point on Twickenham Embankment, which is itself partially within Flood Zone 3b. This is **an illogical and unreasonable basis for classifying the entire island as functional floodplain**. The island itself does not serve as a flood storage area, nor does it experience frequent or prolonged flooding.

If the Council is concerned about safe access during tidal events, the appropriate response is to **address the infrastructure issues relating to the bridge and embankment**, rather than imposing an unnecessary flood designation on the entire island. One would expect flood zone classifications to be based on **actual flood risk to land and buildings, not on a single access point that is external to the site itself**.

Lack of proper consultation raises concerns about transparency

Another troubling aspect of this decision is the **lack of proper consultation**. The change was introduced late in the Local Plan process and was **not subject to meaningful public scrutiny**. Residents and business owners were denied the opportunity to challenge the basis for this decision during the Local Plan public inquiry, as the wording had not been included in the original consultation draft. The fact that such a significant change is being pushed through without due consideration raises serious concerns about transparency and fairness.

Significant negative impact on the island's residents, businesses and broader economic viability

This policy shift is not just a technical change—it carries **real-world consequences** that will damage the local economy, property values, and the ability of Eel Pie Island to remain a thriving and sustainable community including:

Severe planning restrictions

Potential mortgage refusals

Potential insurance refusals

Contradicts national policy objectives on sustainable development and economic growth

At a time when the government is actively seeking to reduce planning barriers to economic growth, LBRuT's decision moves in the opposite direction, introducing an **unnecessary restriction that will stifle investment and economic activity, with no demonstrable benefit in terms of flood risk mitigation.**

This is particularly concerning given that Platt's Eyot—an island with nearly identical flood risk characteristics—is being actively supported for redevelopment in LBRUT's Local Plan. **LBRUT is taking an inconsistent and arbitrary approach, one that unfairly penalises Eel Pie Island while making exceptions elsewhere.**

The classification of Flood Zone 3b must be reconsidered before it causes lasting harm to the island's community and economy.

Penny Jones

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