

From: Shauneen Austin <[REDACTED]>
Sent: 14 March 2025 15:48
To: Richmond Local Plan
Subject: Objection to Proposed modification to Policy 8 (MM44) of the draft Local Plan
Importance: High
Categories: Consultation Response

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To whom it may concern,

My Name is Shauneen Austin and I currently work on Eel Pie Island.

I'm writing to object to the proposed change that would reclassify Eel Pie Island's floodplain status.

As someone who works on the island and I'm really concerned about how this could negatively affect the community and local businesses here.

After reviewing the planning report prepared by Valerie Scott Planning on behalf of Henry Harrison, I agree with many of the concerns raised in the report, especially the potential negative effects this change could have on the island and its residents.

Here's why I'm objecting:

1. **Wrong Classification of Eel Pie Island**
Right now, only 5% of the island is classified as functional floodplain (Zone 3b), and the rest is in Zone 3a (Report, p.10, p.25). The proposed change would put the whole island in Zone 3b, which would create serious restrictions on development, financing, and insurance (Report, p.4, paras 10-12). This doesn't seem fair or justified.
2. **No Public Consultation**
The decision to make this change was made behind closed doors by LBRUT and the EA on March 19, 2024, with no public consultation (Report, p.6, para 20). People should have had the chance to give their input, and not doing so goes against the principles of open planning (Report, pp.7-8, paras 30-35).
3. **Ignoring the Local Impact**
The modification doesn't take into account the real financial and developmental impacts on people and businesses on Eel Pie Island. There's no good reason given for why LBRUT is choosing a different approach than other London boroughs (Report, paras 9-16).
4. **Factual Mistakes in the Draft Plan**
The Draft Plan assumes that all access and egress to the islands are within Zone 3b (Report, p.3), but 95% of Eel Pie Island is actually in Zone 3a, so this assumption is just wrong (Report, p.10, p.25).
5. **Unfair Policy Approach**
Other London boroughs classify functional floodplain as Zone 3b, so LBRUT's decision to do otherwise doesn't make sense (Report, para 12). The EA/LBRUT Statement of Common Ground calls this a "minor modification" (Report, p.7, para 29), which is misleading and underplays how big of a change this really is.
6. **No Solid Justification**
Planning policies should be made with the public's best interests in mind, but this change doesn't seem to have any strong justification behind it (Report, p.7, para 27; p.9, para 43).

Given all of this, I strongly object to the proposed change because:

- It could harm the residents and businesses on Eel Pie Island.

- I implore you to reconsider this modification and make sure that any decisions made are fair, transparent, and based on real evidence.

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