

**From:** Chloe Hall <[REDACTED]>  
**Sent:** 17 March 2025 11:02  
**To:** Richmond Local Plan  
**Subject:** Objection to Proposed modification to Policy 8 (MM44) of the draft Local Plan.

**Categories:** Consultation Response

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Dear Sir/Madam,

I am Chloe Hall, from [REDACTED], writing to formally object to the proposed modification that seeks to alter the floodplain status of Eel Pie Island. As an office employee on the island, I strongly oppose this modification.

Having reviewed the planning report prepared by Valerie Scott Planning on behalf of Henry Harrison, I find myself aligned with the concerns raised in the report, especially regarding the negative and unjustified impact this change would have on Eel Pie Island and its residents.

**Key Objections:**

- Misclassification of Eel Pie Island:** Currently, only 5% of Eel Pie Island is designated as functional floodplain (Zone 3b), with the remaining 95% classified as Zone 3a (Report, p.10, p.25). The proposed modification seeks to reclassify the entire island as Zone 3b, which would subject it to severe planning restrictions, potentially affecting property development, financing, and insurance (Report, p.4, paras 10-12).
- Lack of Public Scrutiny:** The decision to implement this modification was made in a private meeting between LBRUT and the EA on March 19, 2024, with no public consultation (Report, p.6, para 20). There was no opportunity for public representation, undermining the principles of transparent planning (Report, pp.7-8, paras 30-35).
- Failure to Consider Material Factors:** The modification fails to account for the significant financial and developmental impact on Eel Pie Island's residents and businesses. Additionally, no valid justification has been provided for departing from the standard approach followed by other London Boroughs (Report, paras 9-16).
- Material Errors of Fact:** The Draft Plan wrongly assumes that access and egress to all affected islands fall within Zone 3b (Report, p.3). In fact, 95% of Eel Pie Island is classified as Zone 3a, rendering the basis for this modification factually inaccurate (Report, p.10, p.25).
- Inconsistent and Unjustifiable Approach:** Other London Boroughs define functional floodplain as Zone 3b, but LBRUT's approach deviates from this standard without adequate reasoning, resulting in an unfair application of policy (Report, para 12). Furthermore, the EA/LBRUT Statement of Common Ground inaccurately describes this significant change as a "minor modification" (Report, p.7, para 29), misinterpreting planning policy.
- Lack of Proper Planning Justification:** Planning policies should serve the public interest. This modification lacks any clear, demonstrated justification for its implementation (Report, p.7, para 27; p.9, para 43).

**Conclusion:**

I strongly object to the proposed modification for the following reasons:

- I urge the authorities to reject this modification and ensure a fair, evidence-based planning process.
- Yours faithfully,

Fine & Country Surrey  
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