

**From:** Josh McGee <[REDACTED]>  
**Sent:** 14 March 2025 16:13  
**To:** Richmond Local Plan  
**Subject:** Objection to Policy 8 (MM44) of the draft Local Plan

**Categories:** Consultation Response

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Dear Sir/Madam,

I'm Josh McGee from [REDACTED], and I'm writing to formally object to the proposed modification that seeks to change the floodplain status of Eel Pie Island. As both an office occupier on the island and someone with professional expertise in planning, I find this proposal not only misguided but harmful, and I strongly oppose it.

I've reviewed the planning report from Valerie Scott Planning, commissioned by Henry Harrison, and I share the concerns laid out in the document, particularly regarding the severe and unjustified impact this change would have on Eel Pie Island and its residents.

## **Key Objections:**

### **1. Misclassification of Eel Pie Island**

At present, only 5% of Eel Pie Island is designated as functional floodplain (Zone 3b), with the remaining 95% classified as Zone 3a. The proposed modification would arbitrarily place the entire island into Zone 3b, subjecting it to extreme planning restrictions that would cripple property development, financing, and insurance options. This change, if passed, would be devastating to the island's future.

### **2. Lack of Public Scrutiny**

This decision was made behind closed doors, with a private meeting between LBRUT and the EA on March 19, 2024, completely bypassing public consultation. There was no opportunity for residents or businesses to voice concerns, violating basic principles of transparency and public involvement in planning processes.

### **3. Ignoring Material Factors**

The proposed modification completely disregards the economic and developmental consequences for Eel Pie Island's businesses and residents. There is no reasonable justification for treating Eel Pie Island differently from other areas in London, especially when other boroughs follow a more consistent and fair approach.

### **4. Material Errors of Fact**

The Draft Plan wrongly assumes that access and egress to all affected islands fall within Zone 3b. In reality, 95% of Eel Pie Island is in Zone 3a, which makes the basis for this modification fundamentally flawed.

### **5. Inconsistent and Unjustified Approach**

While other boroughs adhere to the standard classification of functional floodplain as Zone 3b, LBRUT's decision to deviate from this norm is baseless and results in an unfair application of policy.

The EA/LBRUT's Statement of Common Ground dismisses this drastic change as a "minor modification," which is an outright misinterpretation of planning policy.

#### **6. Lack of Proper Planning Justification**

Planning policies must serve the public interest, and this modification fails to demonstrate any legitimate reason for the changes proposed. It lacks both clear justification and evidence supporting its potential benefits.

#### **Conclusion:**

I firmly object to this modification for the following reasons:

- It would cause irreparable harm to Eel Pie Island and its residents.
- It was pushed forward without proper public consultation or consideration of material facts.
- It imposes an unfair, inconsistent, and unjustified approach compared to other London Boroughs.
- It's based on a flawed understanding of planning policy, with no legitimate public interest justification.

I urge the authorities to reject this modification and ensure that any future planning decisions are made based on solid evidence and a transparent, fair process.

Sincerely,

Josh McGee

