

From: Sean Barrett <[REDACTED]>
Sent: 14 March 2025 15:18
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 Sean Barrett of [REDACTED] writing to formally object to the proposed modification that seeks to alter the floodplain status of Eel Pie Island. As an office occupier on the Island with professional experience in planning, I strongly oppose this modification.

I have reviewed the planning report prepared by Valerie Scott Planning on behalf of Henry Harrison. My objection aligns with the concerns outlined in the report, particularly regarding the unjustified and detrimental impact on Eel Pie Island and its occupants.

Key Objections

1. 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 would place the entire island into Zone 3b, subjecting it to severe planning restrictions, affecting property development, financing, and insurance (Report, p.4, paras 10-12).

2. Lack of Public Scrutiny

- The decision was reached in a private meeting between LBRUT and the EA on March 19, 2024, without public consultation (Report, p.6, para 20).
- No opportunity was provided for public representations, violating fundamental principles of transparent planning (Report, pp.7-8, paras 30-35).

3. Failure to Consider Material Factors

- The modification disregards the financial and developmental impacts on Eel Pie Island's residents and businesses.
- No justification has been provided for deviating from the standard approach used by other London Boroughs (Report, paras 9-16).

4. Material Errors of Fact

- The Draft Plan incorrectly assumes that access and egress to all affected islands lie within Zone 3b (Report, p.3).

- In reality, 95% of Eel Pie Island is in Zone 3a, making the basis for this modification factually flawed (Report, p.10, p.25).

5. Inconsistent and Unjustifiable Approach

- All other London Boroughs define functional floodplain as Zone 3b. LBRUT's deviation lacks rationale and results in an unfair policy application (Report, para 12).
- The EA/LBRUT Statement of Common Ground mischaracterizes this drastic change as a "minor modification" (Report, p.7, para 29), misinterpreting planning policy.

6. Lack of Proper Planning Justification

- Planning policies must serve the public interest. This modification lacks any demonstrated justification (Report, p.7, para 27; p.9, para 43).

Conclusion

I object to the proposed modification because:

- It would cause significant harm to Eel Pie Island and its occupants.
- It was introduced without public scrutiny or due consideration of material factors.
- It imposes an inconsistent and unjustified approach compared to other London Boroughs.
- It is based on a flawed interpretation of planning policy and lacks legitimate public interest justification.

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

Best,

Sean Barrett | Managing Director

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