

**From:** Dannie Walton <[REDACTED]>  
**Sent:** 14 March 2025 16:26  
**To:** Richmond Local Plan  
**Subject:** Objection to Proposed modification to Policy 8 (MM44) of the draft Local Plan

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Dear Sir/Madam,

I am Dannie Walton, writing to formally object to the proposed modification that seeks to alter the floodplain status of Eel Pie Island. As an interested party with a deep understanding of planning principles, I strongly oppose this modification.

## 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. The proposed modification would reclassify the entire island as Zone 3b, imposing severe planning restrictions that could negatively impact property development, financing, and insurance.

### 2. Lack of Public Scrutiny

- The decision was made in a private meeting between the London Borough of Richmond upon Thames (LBRUT) and the Environment Agency (EA) on March 19, 2024, without public consultation. This lack of transparency violates principles of fair planning processes.

### 3. Failure to Consider Material Factors

- The modification disregards the financial and developmental consequences for residents and businesses on the island.
- It deviates from standard approaches used by other London Boroughs without justification.

### 4. Material Errors of Fact

- The Draft Plan incorrectly assumes that access and egress to all affected islands lie within Zone 3b. In reality, 95% of Eel Pie Island is in Zone 3a, undermining the factual basis for this modification.

### 5. Inconsistent and Unjustifiable Approach

- Other London Boroughs define functional floodplain (Zone 3b) differently. LBRUT's approach is inconsistent and lacks rationale, leading to unfair policy application.
- The EA/LBRUT Statement of Common Ground misrepresents this significant change as a "minor modification," which misinterprets planning policy.

### 6. Lack of Proper Planning Justification

- Planning policies are meant to serve the public interest. This modification lacks evidence-based justification and does not align with broader planning principles.

## 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.

Thank you for considering my objections.

Sincerely,

Dannie Walton

All the Best,

Dannie Walton | Director

E: [REDACTED]

T: [REDACTED]

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