

From: Steven Nalon <[REDACTED]>
Sent: 17 March 2025 10:04
To: Richmond Local Plan
Subject: [REDACTED] - proposed modification of floodplain status of Eel Pie Island

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Dear Sir/Madam,

I am Steven Nalon, from [REDACTED] writing to formally raise my objections to the proposed modification that aims to change the floodplain status of Eel Pie Island. As a professional involved in planning and an office occupier on the Island, I am strongly opposed to this modification.

After reviewing the planning report by Valerie Scott Planning on behalf of Henry Harrison, I find my concerns align closely with the issues raised in the report, particularly the unnecessary and harmful impact this change could have on Eel Pie Island and its residents.

Key Points of Objection

Misclassification of Eel Pie Island

At present, only 5% of Eel Pie Island is designated as functional floodplain (Zone 3b), while the remaining 95% falls under Zone 3a (as mentioned on p.10 and p.25 of the report).

The proposed modification seeks to reclassify the entire island into Zone 3b, which would subject it to severe planning restrictions, greatly impacting property development, financing, and insurance (Report, p.4, paras 10-12).

Lack of Public Consultation

The decision to implement this modification was made during a private meeting between LBRUT and the EA on March 19, 2024, without any public consultation (Report, p.6, para 20).

This process did not allow for public input or scrutiny, which goes against the essential principles of transparent and inclusive planning (Report, pp.7-8, paras 30-35).

Failure to Account for Key Factors

The modification fails to adequately consider the financial and developmental impacts on Eel Pie Island's businesses and residents.

Furthermore, there is no justification for departing from the standard approach applied by other London Boroughs (Report, paras 9-16).

Inaccurate Information

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

However, in reality, 95% of Eel Pie Island is classified as Zone 3a, making the foundation for this modification factually incorrect (Report, p.10, p.25).

Inconsistent and Unjustifiable Approach

Other London Boroughs uniformly define functional floodplain as Zone 3b. LBRUT's deviation from this standard is unsupported and leads to an unfair policy application (Report, para 12).

Moreover, the EA/LBRUT Statement of Common Ground misleadingly labels this substantial change as a "minor modification" (Report, p.7, para 29), failing to interpret planning policy correctly.

Lack of Adequate Planning Justification

For any planning policy to be valid, it must serve the public interest. This proposed modification, however, lacks a sound justification (Report, p.7, para 27; p.9, para 43).

Conclusion

I object to this proposed modification for the following reasons:

It will cause significant harm to Eel Pie Island and its residents.

It was introduced without proper public consultation and fails to consider key factors.

It takes an inconsistent and unjustifiable approach when compared to other London Boroughs.

It relies on a flawed interpretation of planning policy and does not serve a legitimate public interest.

I urge the relevant authorities to reject this modification and ensure that any future planning decisions are made with fairness and based on clear, evidence-based reasoning.

Kind regards,

Steven Nalon