Dear Sir/Madam

Haringey Local Plan Main Modifications

Thank you for consulting us on the main modifications on the four development documents which make up your Local Plan:

- Alterations to the Strategic Policies;
- Development Management DPD;
- Site Allocations DPD; and
- Tottenham Area Action Plan.

We are pleased to see that our comments and suggestions relating to flood risk and development in Source Protection Zones have been considered and taken on board. We note that there are some further alterations to aspects we did not comment on previously (DMMod 55, 56 and 57) and acknowledge the intention to make the policies more positively worded. Policy DM28 part D would be stronger if it stated ‘proposals must not’ rather than should not as in Policy DM27 part D.

We note that our requests for additional wording in the site allocations relating to deculverting and delivering Water Framework Directive Actions have not been incorporated. We feel this is a missed opportunity to ensure that the allocated sites include specific actions to ensure that the objectives within the Thames River Basin Plan can be delivered. Particularly as Regulation 17 of the Water Environment Regulations 2003 (WFD) places a duty on local planning authorities to ‘have regard to’ River Basin Management Plans (RBMP).

However we are pleased to see that the Development Management Plan policy 28 places a requirement on developers to demonstrate that the objectives of the Thames RBMP have been taken into account. We hope you will work with us on an individual site basis going forward to ensure that the WFD actions can be implemented and contribute to improving the status of the waterbodies in your borough.

I hope the above is helpful as you progress with your local plan. If you have any queries please do not hesitate to get in touch with us.

Yours faithfully
Mrs Jane Wilkin
Planning Advisor

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