GNLP REG 19 COMMENTS RSPB

“*The RSPB is pleased to be able to provide comments on the Regulation 19 GNLP documents. The RSPB considers the plan to be sound in most cases. This evaluation is based on the conclusions of the Habitats Regulations Assessment and the Water Cycle Study. Only once the consultation period for the Water Cycle Study ended and upgrades to Water Recycling Centres have been completed to provide additional capacity for wastewater can policies be justified and deemed sound. This is especially relevant to Policies 1 – Sustainable Growth, Policy 2 – Sustainable Growth, Table 8 (water) and Policy statement points 8 and 9, Policy 3 – Environmental Protection and Enhancement.*

*Despite the overall conclusion that the plan is sound, being based on an appropriate evidence to justify the proposals and that it has been positively prepared, the RSPB has identified a number of points where we consider the Local Plan needs to be amended.”*

*Wastewater Strategy*

*Existing watercourses and water bodies are already not meeting WFD targets, and the nutrient load has already caused deterioration. Obtaining water of suitable quality to maintain biodiversity is already extremely challenging.*

*Water Supply Strategy*

*RSPB concurs with the finding that additional water efficiency scenarios are needed to achieve different levels of demand within the study area. Especially creation of a water use policy for new homes and development of options for retrofitting existing properties with efficiency fixtures and fittings*