

Tewkesbury Borough Plan Examination in Public 16 February 2021

Submission by Adrian Darby, Chairman of Governors, on behalf of Kemerton Conservation Trust

Matter 1 Duty to co-operate and other legal requirements.

Question 1.1 Duty to co-operate

1. Under the provisions of the Environment Bill Currently before Parliament there will be a requirement for authorities to prepare Nature Recovery Strategies for the whole of England.
2. Once this becomes law it will be necessary for neighbouring authorities to cooperate in the preparation of maps showing coherent corridors across authority boundaries since species and habitats do not respect administrative boundaries. Such cooperation will be required inter alia between Gloucestershire and Worcestershire and at a more local level Tewkesbury Borough and Wychavon. It may be made more difficult by the fact that the two counties are in different regions. It may be thought premature to consider this issue, but I would argue it will certainly become relevant during the plan period.
3. I will be addressing this issue in more detail under my consideration of NAT1.

Question 1.6 Habitats Regulations Assessment

1. The assessment considers the various Special Areas of Conservation within the plan area and the possible harmful effects of development proposed in the plan. However it does not consider future effects and the necessity of affording long-term protection to these sites. The particular concern KCT has here is the maintenance of the very small populations of Violet Click Beetle *Limoniscus violaceus* for which Dixton Wood and Bredon Hill have been notified. Such small isolated populations are very vulnerable to extinction. It is necessary not only to protect existing habitat linkage between these sites but to provide for future enhancement of such linkages which is one of the aims of the Carrant Cartchment Restoration Project
2. I will be addressing this issue in more detail under my consideration of NAT1.