From:	David Burn
To:	Progress Power
Cc:	"Christine Fisher"; Clerk, Thrandeston Parish Council
Subject:	Submission regarding the Progress Power DCO ref.EN010060
Date:	02 October 2014 23:27:38
Attachments:	Species rich hedges - discussion (final).pdf

Please receive the attached report as a further submission from the Eye Airfield Parishes Working Group on behalf of:

Brome & Oakley Parish Council
Mellis Parish Council
Palgrave Parish Council
Thornham Magna Parish Meeting
Thornham Parva Parish Meeting
Thrandeston Parish Council
Yaxley Parish Council

all of which are registered interested parties.

Regards,

David Burn

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OBSERVATIONS ON THE USE OF THE TERM 'SPECIES-POOR' IN THE ENVIRONMENTAL STATEMENT SUBMITTED WITH PROGRESS POWER'S DCO (Planning Inspectorate Reference EN010060)

by

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prepared for the

EYE AIRFIELD PARISHES WORKING GROUP

representing

BROME & OAKLEY PARISH COUNCIL (reg. no.10026569)
MELLIS PARISH COUNCIL (reg. no.10027645)
PALGRAVE PARISH COUNCIL (reg. no.10027640)
THORNHAM MAGNA PARISH MEETING (reg. no.10027482)
THORNHAM PARVA PARISH MEETING (reg. no.10027134)
THRANDESTON PARISH COUNCIL (reg. no.10027451)
YAXLEY PARISH COUNCIL (reg. no.10027366)

Species-rich vs species-poor hedges at Yaxley (and a comment on 'mounding')

With particular reference to comments on the species-richness of hedgerows in the proposed location of the electrical connection compound that appear in paragraphs 7.9 to 7.11 of the Suffolk County Council (SCC) and Mid Suffolk District Council (MSDC) joint *Local Impact Report* (LIR), I would like make some further observations.

I seek to demonstrate that the hedgerows in question are species-rich and not species-poor as is claimed in Progress Power's *Environmental Statement*.

My own assessment of these hedgerows is given in paragraphs 24.01 to 25.00 of my report *Comments on the proposed gas fired power station at Eye Airfield, with particular reference to the following proposed associated works to the west of the A140: Electricity Sub Station and Sealing Compound*, which forms Annex 4 of The Eye Airfield Parishes Working Group Written Representation, dated 4 September 2014.

I should like to refer to the *Hedgerow Survey Handbook* , 2nd edition published by DEFRA in 2007 on behalf of the steering group for the UK Biodiversity Action Plan (BAP) for hedgerows. This extract is from Appendix 1 – Glossary of terms:

> ***Hedgerow – species-rich****: This is where the structural species making up the 30m section of hedgerow include at least five (or at least four in northern and eastern England, upland Wales and Scotland) woody species that are either native somewhere in the UK, or which are archaeophytes, that is, they have been recorded as naturalised in the wild before 1500 AD. Climbers (except roses) and bramble do not count towards the total. Hedgerows that contain fewer woody species but have a rich basal herbaceous flora may also be defined as species-rich, but at present the criteria to define this have to be set on a local basis as there is no national definition.*

On this basis, all the hedges around the co-axial fields which are to be removed are species-rich regardless of the ground flora.

The publication of the original 2002 edition of the *Hedgerow Survey Handbook* was written under contract by Catherine Bickmore Associates and was funded by Defra, Countryside Agency, Countryside Council for Wales and English Nature on behalf of the Steering Group for the UK Biodiversity Action Plan for Hedgerows. The 2007 revision was prepared by ADAS, also under contract, and funded by Defra.

The 2002 edition formed the basis of the definition of a hedgerow in a further publication, *UK Biodiversity Action Plan; Priority Habitat Descriptions* BRIG (ed. Ant Maddock) 2008, (updated July 2010). It provides no means of assessing species richness but it does suggest that herbaceous bottom vegetation forms a part of the hedgerow. However, from the *Hedgerow Survey Handbook* 2007 it seems that ground flora only comes into consideration when the number of woody species is less than five.

The comments in the LIR might also have been influenced by the extremely vague definition of 'species-rich hedge' which appears in the 2010 edition of the *Handbook for Phase 1 habitat survey* published the Joint Nature Conservation Committee and simply says:

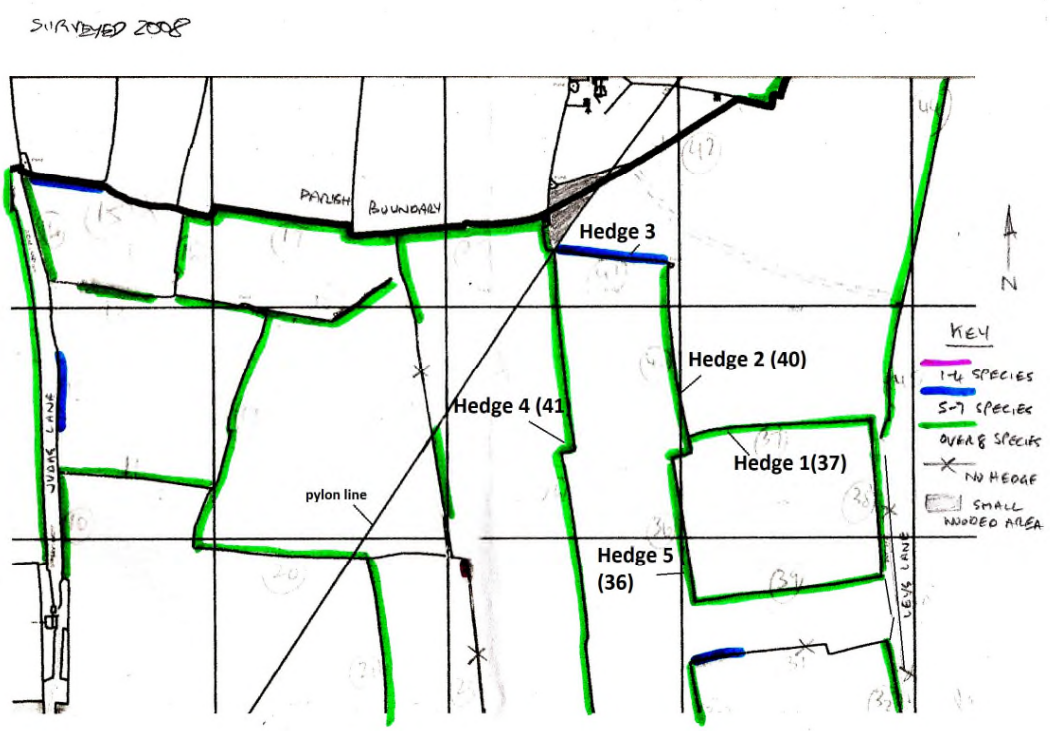
> *These have a diversity of native woody species and a good hedgerow bottom flora.*

It is up to the surveyor to decide what constitutes a 'diversity' and how good is 'good'. Therefore surely the surveyor could either list what they have found, or state how many species comprises 'good'. I have yet to find any definitions of these in the Progress Power *Environmental Statement*. These different definitions using the same terms are certainly confusing and misleading *even to professionals*. The DEFRA definition in the 2nd edition of the *Hedgerow Survey Handbook* at least gives something to discuss.

As to the discrepancies with the *Suffolk Hedgerow Survey* published in 2012 (SHS), that document has simplified the definitions of hedges and has given a quantified indication of the variation (species-richness) in the hedges. It has three categories – after all there cannot be a sharp line between species-poor/rich with no definition! I did not actually base my comments on the hedgerows on this as I visited the location and looked at the hedges myself. I then contacted the local SHS surveyor and looked at the actual survey sheets.

The original survey sheets that I saw (parish of Yaxley – see below) did not display 'the total number of species not just woody species'. The survey form, as I know myself from doing the survey for Waldringfield, gives space for commenting on the ground flora but the numbers on which the definitions of green, blue or red hedges are judged are on the woody species, including, sensibly, ivy and bramble but not woody nightshade or other herbaceous climbers. Hedge 25 (SHS) is apparently missing from the applicant's Phase 1 Habitat Survey map but I cannot confirm this as it was not on the survey plan I saw. I looked at the hedges that would be directly affected by the substation and gave them my own numbers 1-5.

The following plan is the original produced by the SHS surveyor on which I have added my numbers for the hedges; these cross refer to my table of woody species at paragraph 24.04 on page 30 of my report. The SHS numbers are in brackets.



Paragraph 7.11 of the LIR confirms that despite all the confusion all the hedges nonetheless qualify as Valued Ecological Receptors (VER). **However this does not prevent an element of disparaging comment appearing in the ES and in other correspondence when referring to these hedges as species-poor.**

Relevance of the terms used in the context of a planning application

The proposal is described as removing species-poor hedges and planting lengths of what they describe as 'species-rich ' hedges. Absent from these are of course ash and elm (which are in all the hedges at present).

The proposal would remove *local* genotypes of all the natives (oak, ash, hazel, hawthorn etc.) replacing with bought-in plants (even if of British provenance).

On examination, the applicant's planting proposal is plants spaced at 45cms of a limited number of species some of which (holly, guelder rose) are not evident locally. Elderberry and cherry plum (Myrobalan, archaeophyte) which are currently in the hedges are also absent from the proposed hedges, which are the same throughout.

Maintenance proposed of the newly planted hedges

The maintenance in year one includes six visits each involving spraying a 2m wide strip where the hedges are planted with herbicide in effect removing all the ground flora. This is followed by in years 2 to 4:

> *Maintenance works in Years 2 to 4 after planting would include four maintenance visits at regular intervals between 1st March and 30th September. At each visit all plants would be firmed up, herbicide would be used to control weed growth in all planting.*
>
> from: Parsons Brinckerhoff document *10.6 Landscape Mitigation Strategy*, paragraph 6.3.3

By any definition the result of this will not be species-rich and certainly not more rich than the composition of the hedges at present.

VER vs Biodiversity Action Plan (BAP) habitat

The following is from *6.1 Environmental Statement*, page274 :

> *8.7.91 The Electrical Connection runs parallel to a short hedgerow to the west of the former Eye Airfield runway, adjacent to a factory. Species within the hedgerow include ash, dogwood, elder, hawthorn, oak and sycamore. The hedgerow ends approximately halfway along the factory premises and is replaced with a tree line and scattered scrub.*
>
> *8.7.92 Species-rich hedgerows are a Suffolk BAP priority habitat. Although the length of this hedgerow and its lack of connectivity to the wider hedgerow network are limiting to its value, its status as a priority habitat means it is considered to be a VER of Local value.*
>
> ***Species-Poor Hedgerow with Trees***
>
> *8.7.93 Species-poor hedges with trees are present along Old Norwich Road and south of the Yaxley Lake. A small section is also present along arable field boundary situated within the Electrical Connection Compound Site. A number of these are solely comprised from hawthorn, although ash, blackthorn, elder, English elm, field maple and hornbeam are also present elsewhere.*
>
> *8.7.94 These hedgerows are well connected to the wider hedgerow network and are likely to provide habitat continuity and corridors of movement for a variety of fauna. Although species-poor, these hedgerows are considered to be a VER of Local value.*
>
> ***Species-Poor Intact Hedgerow***
>
> *8.7.95 Two species-poor intact hedgerows are within the Electrical Connection Compound Site, and an additional species-poor intact hedgerow is present adjacent to Old Norwich Road. These hedgerows are largely dominated by hawthorn.*
>
> *8.7.96 These intact hedgerows are well connected to the wider hedgerow network and are likely to provide habitat continuity and corridors of movement for a variety of fauna. Although species-poor, these hedgerows are considered to be VERs of Local value.*

It can be seen here that species-poor hedges are described but the point is made that they are VER habitat whereas species-rich ones are a Suffolk priority BAP habitat. **I contend that the hedges referred to as species-poor within the Electrical Connection Compound site are in fact species-rich and as such are also BAP habitat, therefore warranting more attention.**

I would not agree that the hedges around the co-axial fields are 'largely dominated by hawthorn' as I saw strong sections of field maple, hazel, dogwood, elm, blackthorn and cherry plum.

If one can guarantee that VER offers the same regard and protection as BAP then perhaps the matter is of no consequence. **However the lay person reading the phrase 'species-poor hedge' is immediately going to think 'not very important hedge' in my view and certainly developers have been known to point this out. Inspectors may also be influenced by this designation.**

I think the use of the phrase ‘species-rich’ in the *Handbook for Phase 1 habitat survey* is vague and misleading. There can be a varied hedge with many species, climbers, ivy and bramble which has little bottom flora - is that species-poor?

There is no definition of 'species-poor' in the *Phase 1 Handbook.*

These terms and definitions were not originally meant to guide planning considerations. However I contend that they now are being used for exactly that.

Ground flora

Since the Phase 1 survey fails to spot a ditch in the case of two hedges in the location, I would not rely on it for accurate account of the ground flora.

However the hedges had at least 2m of verge between them and the wheat field which was full of long grasses and although I did not assess ground flora I saw plenty of field willow herb, St Johns Wort and vetches among the grasses, and noted woody nightshade in the hedges.

The photos below show the wide hedge bottom/field edge strips of ground flora along all hedges on the electrical compound site.

Hedge 3 looking eastwards after wheat harvest

Hedge 4 central part

Mounding

While looking again at Progress Power’s *Responses to First Round of Questions* (incorrectly titled *Responses to Written Representations* on page 1) I discovered references to the mounding proposed in the vicinity of the electrical site. I would like to take this opportunity to say that mounding around the site would further destroy the archaeological evidence of the field boundaries and their associated ditches on the ground.

This is the relevant extract:

> *3.4.3. In particular, the revised Landscape Mitigation Strategy at paragraph 5.1.10 notes that planting around the Electrical Connection Compound would include a proportion of larger trees (1.5 m to 3.0 m high) for immediate visual impact (i.e. mitigation).*
> *3.4.4. Detailed proposals for structure planting around the Electrical Connection Compound would be developed, subject to National Grid planting constraints, to screen views from nearby properties and public rights of way. The effectiveness of the mitigation*

planting would be enhanced by landscape mounds in strategic locations within the structure planting, which would be constructed from soil excavated from the Electrical Connection Compound site.
3.4.5. All of the above is subject to the approval of the relevant planning authority, both by virtue of requirement 3 (which requires that details of the layout, scale and external… etc. etc.

Please note the mounding is not shown on the applicant's drawings but would in any case be out of character and destroy the archaeology.

Trees on mounds often do not grow well as they dry out and the clay soil here would probably dry to a concrete like substrate.

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2nd October 2014