



SPR EA1N & EA2 PROJECTS

DEADLINE 7 – SUBMISSION IN RESPECT OF HEDGEROWS

Interested Party: SASES

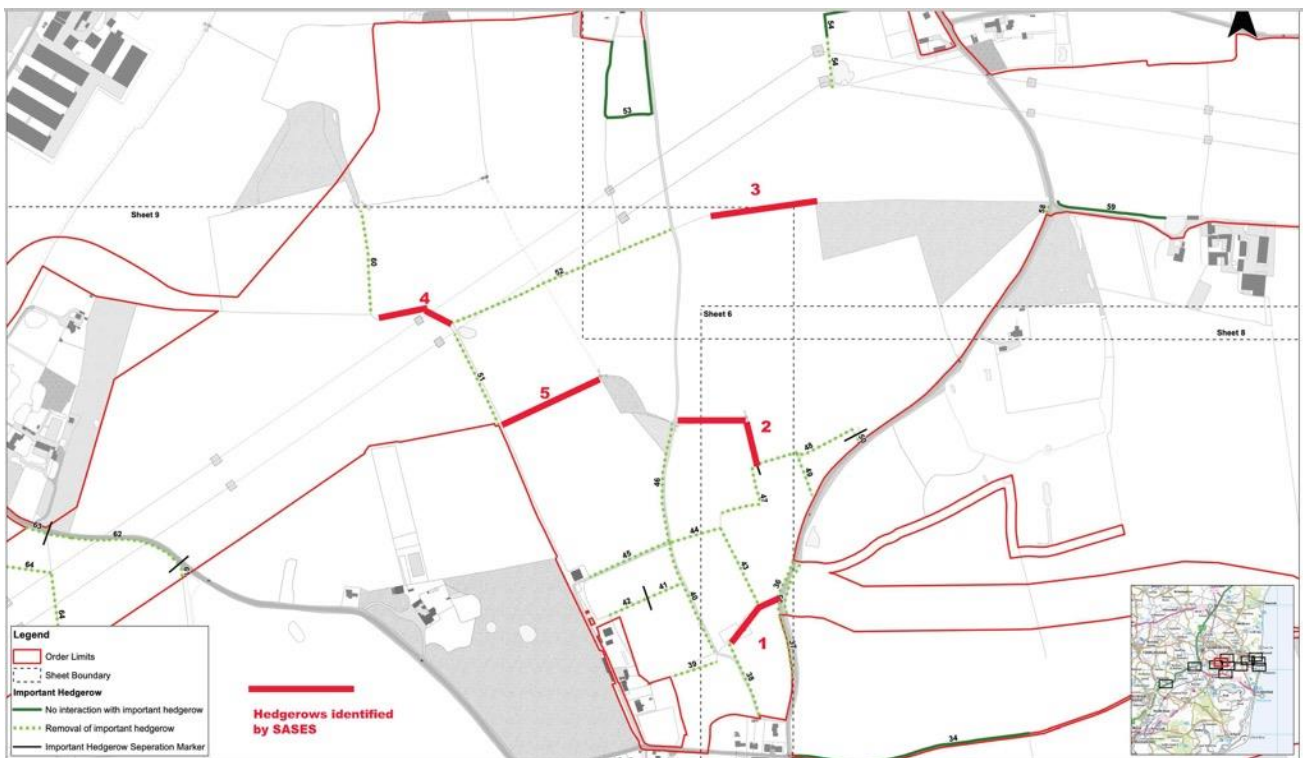
IP Reference Nos: 20024106 & 20024110

Date: 4 March 2021

Issue: 1

1. The Applicants have submitted Important Hedgerows and Tree Preservation Plans (REP3-010). However not all Protected and Important Hedgerows have been identified on these plans.
2. Government guidance on *Countryside hedgerows: protection and management* can be found here: <https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management>
3. This guidance identifies Protected Hedgerows as having the following characteristics: *more than 20m long with gaps of 20m or less in its length; less than 20m long, but meets another hedge at each end.*
4. With regard to location, a hedgerow is protected if it is on or next to: **land used for agriculture** or forestry; land used for breeding or keeping horses, ponies or donkeys; common land; a village green; **a site of special scientific interest**; a protected European site; **a local or national nature reserve** or land belonging to the state. A hedgerow is not protected if it is in, or marks the boundary of, a private garden.
5. None of the Applicants' Hedgerow Plans refer to Protected Hedgerows, of which there are many throughout this mainly agricultural area. It should be noted that there is an unlimited fine if Protected Hedgerows are removed without consent.
6. In respect of the substation site shown on Sheet 7 of the Important Hedgerows Plans, there are a number of existing hedgerows, which have not been scheduled for removal but almost certainly will be removed as they fall within the proposed built environment. Map 1 shows these additional hedgerows with referencing photographs which follow.
7. It is also not clear what the intention is with regard to the mature hedgerow on the western boundary of the substation site with Footpath 17. The red line boundary appears to enclose the hedgerow and the hedgerow is therefore at risk.
8. The Applicants say that there are 67 Important Hedgerows which require removal, however this number of affected hedgerows is significantly understated as no Protected Hedgerows have been identified on the plans. An Important Hedgerow has different criteria, as follows: *it is at least 30 years old; marks all or part of a parish boundary that existed before 1850; contains an archaeological feature; is in or next to an HER; marks the boundary of an estate that existed before 1600; is part of a field system that existed before 1845; contains protected or endangered species; includes woody species specified in Schedule 1 of the Hedgerow Regulations.*
9. Selecting just Important Hedgerows has resulted in Protected Hedgerows being omitted from the DCO. This area of East Suffolk is rich in hedgerows and there will be wholesale

destruction along the full length of the cable route and substation site resulting in a dramatic change in character of the area and loss of habitat for wildlife.



Map 1: Hedgerows on Substation Site. Thick red lines show existing hedgerows omitted from EA1N & EA2 Important Hedgerow Plans.

Below: Hedgerow 2 looking east – note substantial trees





Above: Hedgerow 2 running west to east. Below: Hedgerow 3





Hedgerow 4 (behind pylon)



Hedgerow 5 (running west from wooded pit)