



The countryside charity  
Bedfordshire

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Planning  
Bedford Borough Council  
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3 July 2020

Dear Alan Elderton

**Re: Planning Application 20/01140/HDG  
Land Off Swineshead Road Riseley Bedfordshire**

I refer to the above Planning Application for the removal of approximately 800 meters of “important” field hedgerow.

As far as CPRE Bedfordshire is concerned this is a most unwelcome application coming as it does at a time when our country is faced with catastrophic biodiversity loss.

**We therefore object to this application for the following reasons:**

**1. The hedgerows referred to in the application are “important” hedgerows under the terms of Hedgerow Regulations 1997 and contain species identified under Schedules 2 and 3 of The Regulations. They should therefore be protected from removal.**

It has already been established by Pertenhall & Swineshead Parish Council (see their letter dated 22 June 2020) that the hedgerows are in excess of 30 years old.

CPRE Bedfordshire has conducted a cursory on-site examination of the hedgerows and we believe that they will contain examples of some of the “Woody Species” detailed in Schedule 3 of the Hedgerow Regulations 1997 and “Woodland Species” found in Schedule 2.

**We note that the Wildlife Trust has conducted a desk based survey, we presume at the request of Bedford Borough Council (BBC), using data from records held by the Bedfordshire and Luton Biodiversity Recording and Monitoring Centre (BRMC).**

However this data has not been obtained by BRMC from the hedgerows in question but relates to unspecified areas nearby.

**DEFRA Recommended Site Survey**

The removal of such a considerable length of “important” hedgerow is such a significant matter which could cause considerable biodiversity loss that we believe it is essential for BBC to carry out a detailed Site Survey by a suitably qualified person.

**This is the recommended procedure described by DEFRA in their publication:  
“The Hedgerow Regulations 1997 - A Guide to the Law and Good Practice”  
See Chapter 6 - Considering a Hedgerow Removal Notice – Site Survey pages 22 and 23.**

**2. The application is contrary to Local Plan 2030 Policy 42S –Protecting biodiversity and geodiversity and Policy 43–Enhancing biodiversity**

These 2 Policies are designed to ensure that biodiversity is both protected and enhanced during the course of any proposed development.

The applicant has given as the reason for the removal of the hedgerows: - *“to enable the efficient use of agricultural machinery”*

This is a form of agricultural development in the rural area.

In fact, this is now a very old fashioned form of agricultural development with many farmers recognising the importance of hedgerows to biodiversity improvement which is vital to encourage natural pest control and crop pollination.

Modern farmers are no longer removing hedges but in fact replanting hedges removed in previous years and planting new hedges to encourage biodiversity and reduce soil erosion.

In the case of this application the spray booms of the massive agricultural spraying machines take precedent over biodiversity according to the applicant.

This is no longer a viable farming practice if we are to reverse the catastrophe of biodiversity loss.

The importance of hedges to biodiversity is recognised in their inclusion as a habitat of ‘principal importance’ to biodiversity under Section 41 of the Natural Environment and Rural Communities Act 2006. See Local Plan 2030 para 8.42

The applicant states that the *“hedgerows will be replaced elsewhere on the farm”* without confirming the location of the new hedgerows and when the replacement will take place. This is not acceptable.

Even were they to do so, any replacement hedge would take many years to develop the biodiversity of the hedgerow they would like to remove which contains, among other things, some very old Oak trees.

**3. The applicant does not state whether his business is in receipt of EU agricultural funding. Some forms of EU funding do not allow the removal of hedges.**

**4. The application is contrary to Local Plan 2030 Policy 37 - Landscape Character. This requires that development will protect and enhance the key landscape features and visual sensitivities of the landscape character areas as defined in the BBC Landscape Character Assessment.**

The area in question is the Riseley Clay Farmland and the LCA specifically states:

The overall Landscape Strategy is to ... *“conserve the open rural landscape with its scattered small scale settlements and farmsteads.....while enhancing the elements of the landscape which are in declining condition...in particular the hedgerows and hedgerow and field trees...”*

We very much hope that for the reasons outlined above, the Borough Council will reject this application.

**By doing so The Mayor and BBC will remain true to their principals of encouraging a massive increase in biodiversity and working towards a Zero Carbon future as laid down in The Mayor's recent announcement of "Action to Help Birds & Bees" released only a few days ago on 30<sup>th</sup> June 2020.**

Approving this application will set a very unfortunate precedent.

Yours sincerely

Gerry Sansom

CPRE Bedfordshire