From: Alistair Flatman
Sent: 29 June 2021 13:56
To: Hilary Saunders <
Subject: Re: FW: New application post - NYM/2021/0351/OU - Land west of Highfield, Sled Gates, Fylingthorpe Third Party</pre>

Good afternoon Hilary

I hope you are well

Further to your email dated 18 June, please find attached an updated Hedgerow Assessment - I understand the ecologist who prepared this has been in contact with your ecologist as well and as such I trust the attached will meet with their approval

If you require any further information please do not hesitate to contact me

with kind regards

Alistair

Alistair Flatman (MRTPI) Director Alistair Flatman Planning

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On Fri, Jun 18, 2021 at 6:25 PM Hilary Saunders

wrote:

Dear Alistair,

Please see below comments from the Authority's Ecologist that an up to date hedgerow assessment of the hedge in question should be undertaken by a suitably qualified ecologist. The assessment should provide an opinion on whether the hedgerow would qualify as an important hedge under the Hedgerow Regulations by satisfying one or more of the 'wildlife value' criteria (paragraphs 6 to 8 of the Regulations). It would be helpful if a full species list of the hedge (including all woody and ground flora species) is also provided, as this would give valuable information regarding an appropriate planting mix should the application subsequently be approved and the hedgerow removed and replaced on a new line as proposed.

You may wish to await further comments from the Highway Authority before you commission any further reports.

Kind regards

Hilary

Hilary Saunders

Planning Team Leader (Development Management)

North York Moors National Park

The Old Vicarage

Bondgate

Helmsley

York

YO62 5BP

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Following the Government's cautious easing of national restrictions since 29 March 2021 and the recent easing from 17 May, Planning Officers are now available to meet on site or at the office in Helmsley by prior appointment and subject to adherence to the Authority's Covid-19 safeguarding protocol (in the case of pre-application advice this will be subject to the normal fees). The office in Helmsley is likely to re-open to the public on 21 June, however until this date staff will be available to answer telephone calls and receive mail during normal office hours. For further information visit our Planning Coronavirus Webpage.

From: Elspeth Ingleby		
Sent: 18 June 2021 17:39		
To: Hilary Saunders		
Cc: Chris France	Mark Hill	; Elizabeth
Clements		
Subject: RE: New application post - N	YM/2021/0351/OU - Land west of Highfield	d, Sled Gates, Fylingthorpe - Third
Party		

Hi Hilary

In light of recent public comments regarding the hedgerow and its importance, and the age of the previous ecological information, I felt it would be helpful to set out the context of the Hedgerow Regulations 1997 by

which Local Authorities are given a framework to establish whether a hedgerow can be considered of importance. As stated in my initial response, whilst planning applications are not bound to the Hedgerow Regulations (planning legislation supersedes), it is generally considered appropriate that similar criteria is used in assessing a hedgerow as a landowner could choose to remove a hedge out with of any planning application by notifying the Local Authority as per due process and if not deemed of 'Importance' we would be unable to refuse consent.

In order for a hedgerow to be deemed 'Important' under the Hedgerow Regulations of 1997, it must be in existence for at least 30 years <u>and</u> satisfy at least 1 criteria set out within part II of Schedule I of the Regulations. These criteria reflect the hedgerow's potential archaeological, historical, wildlife or landscape value. There are eight different criteria set out in the Regulations, five connected with archaeological, historical or landscape values, and three relating to wildlife value. From our experience of dealing with hedgerow notifications in the National Park, most hedgerows that are deemed 'Important' classify under archaeological, historical or landscape reasons, with unfortunately very few qualifying for any of the three 'wildlife' criteria, as a very significant level of ecological value is required to qualify. As any qualifying features for the archaeological, historical or landscape criteria must relate to records predating 1997, these cannot have changed since the hedgerow was previously assessed by colleagues for a previous application on the site. There was not found to be the features necessary to meet the criteria under these values and I will therefore not go into these further here.

The three wildlife related criteria are based on;

- The presence of species listed under several specific schedules of the Wildlife and Countryside Act (1981), declining breeders of the rare data list or species categorised as 'rare' 'vulnerable 'endangered' or 'extinct' in Red Data books.
- The number of woody species in the hedge, combined with a certain number of associated features (more woody species means there needs to be fewer associated features)
- The presence of an adjacent public right of way (certain types only) and including four woody species and associated with at least two additional features.

Where 'woody species' are referred to these must be on a specific list provided under Schedule 3 of the Regulations, and due to the length of the hedge, these must be within the central 30m of hedgerow. Some species including willow and rose are grouped (ie two types of willow counts as only one type of woody species).

When previously assessed, the hedgerow was found to contain no species that qualify under the first of these criteria. Three woody species were found within the relevant part of the hedgerow, one fewer than the minimum number required under the Regulations for the second criteria, which would require four associated features. Assuming that the site contains at least three qualifying woodland ground flora species (as it did previously) this site would have three associated features. To qualify with three associated features, at least five woody species would need to be present. The last criteria relates to an adjacent public right of way. Since the previous assessment was made, no alterations have been made to the Hedgerow Regulations and therefore the same very strict definition of what is included under this criteria remains. My colleagues determined previously that the adjacent road in this case does not qualify under this criteria.

The length of time that ecological surveys can be deemed valid is variable depending on what is being assessed. Two years is considered a rough guide, however in some cases more frequent assessment is

likely to be necessary, for example for very mobile species such as bats, whereas in other cases where the features of interest are unlikely to have changed then a longer period may be valid. My professional opinion is that the likelihood of new woody species (included under Schedule 3 of the Hedgerow Regulations) becoming established in a managed hedge on the edge of a village environment since the previous assessment was conducted is small. I also believe that the likelihood of finding rare protected species within the hedge that would qualify under the first criteria listed above, that hadn't been previously recorded, in such an environment is likewise extremely small. However I do accept that the risk is not negligible, and therefore in order to make absolutely sure that nothing has been missed, it would be appropriate that the applicant commissions a hedgerow assessment of the hedge in question to be undertaken by a suitably qualified ecologist. The assessment should provide an opinion on whether the hedgerow would qualify as an important hedge under the Hedgerow Regulations by satisfying one or more of the 'wildlife value' criteria (paragraphs 6 to 8 of the Regulations). It would be helpful if a full species list of the hedge (including all woody and ground flora species) is also provided, as this would give valuable information regarding an appropriate planting mix should the application subsequently be approved and the hedgerow removed and replaced on a new line as proposed.

Kind regards

Elspeth

Elspeth Ingleby MA_{Cantab} ACIEEM

Ecologist

North York Moors National Park Authority

The Old Vicarage, Bondgate, Helmsley, York YO62 5BP



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28th June 2021

Alistair Flatman Alistair Flatman Planning

Dear Alistair,

Subject: Land West of Highfield – Hedgerow Assessment - Letter Report

Introduction

Middleton Bell Ecology (MBE) were commissioned on 21st June 2021 by Alistair Flatman of Alistair Flatman Planning on behalf of the client Jonathan Scott of Britology Ltd to assess a hedgerow in Fylingthorpe. The purpose of the assessment was to determine whether the hedge classified as Important under the Hedgerow Regulations 1997, according to the wildlife and landscape criteria listed in Paragraphs 6-8 of Schedule 1. This hedgerow is located adjacent to Sled Gates and is centred on Ordnance Survey Grid Reference: NZ 94006 04862 (see H1, Figure 1).

The hedgerow, which is the subject of this report, was surveyed twice in 2003 and once c.2005, with survey data obtained at this time kindly supplied by Elspeth Ingleby, an Ecologist for North Yorkshire Moors National Park Authority. Historic survey information is supplied in Appendix 1 of this report, with the findings of the c.2005 survey presented first followed by the findings of the two 2003 surveys.

This letter report presents the methods, results and assessment of the survey works undertaken.

<u>Methodology</u>

On 22nd June 2021, Robert Bell (MCIEEM) of Middleton Bell Ecology carried out an assessment of the hedgerow adjacent to Sled Gates (H1, Figure 1) against the wildlife and landscape criteria listed in Paragraphs 6-8 of Schedule 1 of The Hedgerow Regulations 1997. Two additional hedgerows on the boundaries of the proposed development site were also surveyed (see H2 & H3 on Figure 1).

In addition to assessment against the Hedgerow Regulations, all plant species present in, or at the base of H1 were recorded.

Figure 1. Hedgerow numbering plan



Limitations

The hedgerow assessment was undertaken in late June, a time when some spring growing (vernal) species of woodland plant may have died back. Signs of such species were searched for, however, it is accepted that some species, particularly where they are present at low levels of abundance, could have been overlooked.

<u>Results</u>

The key survey findings are detailed in Table 1. Whilst H1 & H2 are species rich, with five woody species present within a 30m length, neither classify as Important under The Hedgerow Regulations 1997.

Hedge 1, which comprises the hedge adjacent to Sled Gates, supports five woody species, as included on Schedule 3 of The Hedgerow Regulations. This hedge is approximately 2m tall by 1.5m wide. It has two associated features which comprise: a wall which supports the hedgerow along at least one half of its length, and gaps which do not exceed 10% of the length of the hedgerow. Hedge 1 lacks any standard trees, a ditch, a parallel hedge, or connection points scoring more than four points (Table 1). A total of 22 plant species were recorded either from H1 or from its base (see Appendix 2). Photographs of H1 are presented in Plates 1, 2 & 3.

Hedge 2 supports five woody species and comprises a regularly trimmed hedge approximately 1.2m high x 1m wide (Plate 3). This hedge has one associated feature which comprises gaps which do not exceed 10% of the length of the hedgerow.

Hedge 3 is a gappy garden boundary hedge, approximately 2m in height and supported by a chain link fence (Plate 4). This hedge comprises mainly garden privet *Ligustrum ovalifolium* with some beech *Fagus sylvatica*.

Table 1. Key survey findings

Hedge Number	H1	H2	H3
Total length (m)	51	39	53
% gaps	0	0	40
Any gaps more than 5m	No	Yes	
Height (m)	2	1.2	2
Width (m)	1.5	1	1.5
Hedgerow type	Shrubby hedgerow	Shrubby hedgerow	Shrubby hedgerow
Hedgerow shape	Untrimmed	Trimmed and dense	Untrimmed
Mature trees	No	No	No
Adjacent land use	Road to north with pasture to south	Pasture to north, garden to south	
Adjacent to public right of way	According to NYMNPA judgement, Sled Gates does not class as a public right of way under The Hedgerow Regulations		No
Protected species present	No	No	No
Total connection points	3	3	3
No. of woody species in 30m length	5	5	1
Is the hedgerow species rich (at least 5 woody species)	Yes	Yes	No
Woody species (included on Schedule 3 of The Hedgerow Regulations) present across whole hedge	Hawthorn, ash, blackthorn, holly, dog rose Hawthorn, ash, blackthorn, field maple, hazel, dogwood		Beech
Woodland species (included on Schedule 2)	Herb robert		
Associated features present	A wall which supports the hedgerow along at leastGaps which do notone half of its length, gapsexceed 10%which do not exceed 10%of the lengthof the length of the hedgerowof the hedgerow		
Does hedgerow classify as Important under The Hedgerow Regulations	No	No	No

Plate 1. Looking east at H1 from Sled Gates



Plate 2. Close view of H1, with the supporting wall just visible at base and great stitchwort *Stellaria holostea* in flower



Plate 3. Hedge 1 on left of image with H2 in centre



Plate 4. Hedge 3



Assessment

To classify as Important with five woody species present within a 30m length, H1 would need to have three associated features, however, it has only two such features (a bank or wall supporting the hedgerow, and less than 10% gaps).

Only a single woodland species, as included on Schedule 2 of The Hedgerow Regulations was recorded from H1 during the 2021 survey, with this species comprising herb-robert *Geranium robertianum*. It is noted that various surveys of this hedge, undertaken in the early 2000s (Appendix 1), recorded a number of additional woodland species from the hedge including sweet violet *Viola odorata*, primrose *Primula vulgaris*, strawberry (species not specified) and lords and ladies *Arum maculatum*. Were at least three woodland species present within one metre, in any direction, of the outermost edges of the hedgerow, then this would result in the hedge meeting a third additional criteria. This criteria was not met on the basis of the 2021 survey data however it does appear that at least three woodland species were present in association with H1 in the early 2000s. Assuming that the number of woodland species associated with H1 has declined, then this may be either as a result of increased shading due to hedge growth since coppicing (carried out c.2002), or increased competition from bramble *Rubus fruticosus* agg. or fast-growing species indicative of nutrient enrichment such as nettle *Urtica dioica*, creeping thistle *Cirsium arvense* and cleavers *Galium aparine*.

North Yorkshire Moors National Park Authority have confirmed that under the strict criteria of The Hedgerow Regulations 1997, Sled Gates does not classify as a public right of way. Were it to do so, then a lower number of woody species and associated features would enable H1 to classify as Important, and as a result it would do so, however this is not the case.

Any new or replacement hedge planting on the site should be undertaken using a mix of five or more native woody species of local provenance. These species should be chosen from suitable species present in either H1 or H2, with such species comprising hawthorn *Crataegus monogyna*, blackthorn *Prunus spinosa*, holly *llex aquifolium*, dog rose *Rosa canina*, hazel *Corylus avellana* and field maple *Acer campestre*. At this time, ash should not be planted due to the prevalence of ash dieback *Hymenoscyphus pseudoalbidus* and the lack of a commercially available resistant strain of ash tree. A suitable source of hedge plants comprises Naturescape (https://www.naturescape.co.uk/). New lengths of hedge should be planted in a double staggered row 450mm apart at 400mm centres (5/linear metre). All plants should be fitted with clear spiral rabbit guards, supported by a stout cane and subject to an appropriate programme of management.

If you require any further information, please do not hesitate to get in contact.

Yours sincerely,

Robert Bell MCIEEM Principal Ecologist Appendix 1. Historic Hedgerow Survey Data Obtained From H1

File Ref: 2076/3/

North York Moors National Park The Hedgerow Regulations 1997 Hedge Survey Form

Date of Survey:					
42 day date:					
% Gaps :					
Y N					
re: Z					
re: O					
al: 2					
Total number hedgerow trees: Average Number Trees Per 50m:					
YQ					
Y re: re: al:					

Woody Species Survey					· ·		
Mark and number sections to be surveyed on the map, complete species record forms					Number of 30m Sections:	•••••	•••
					Number Completed:		
Number of Woody Species Per Section: 1)	2)		3)	Aggreg	ate		
Average Number of Woody Species Per 30m:		'N	amed' Wo	ody Species	Present:	Y	N
Woodland Ground Flora Survey Number of Schedule 2 Species Within 1m of the Hedge:	Woodland Ground Flora Survey Number of Schedule 2 Species Within 1m of the Hedge:					,	
Species Record Forms Completed: Y N Number of Forms Cor			ompleted:				
Known Rare/Protected Species (Give Details):							
·							
		·····					
Signature:			Date:				
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File Ref: 2076/3/			• • • •	
	The H	York Moors Natio edgerow Regulatio urvey Species Rec	ons 1997	
Farm/Site Name:	· · · · · · · · · · · · · · · · · · ·			
	Hugill.		Date:	

1) Woody Species (Schedule 3)

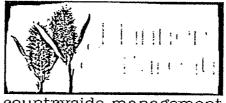
	Section 1 Species present	Section 2 Species present	Section 3 Species present
	A-l		
	$\frac{715}{1}$		
	1649 (SP)	, 	
	Hendhorn		
	Horeysichle)		
	(Ivy)		
	(Sylemore)		
	(Barble)		
L			

2) Woodland Ground Flora (List species within 1m of hedgerow)

vetch (2) Krapieged Plantan Shitch wat Nip/lewate? Ground Evy	Clever 5)	Andyli. Hoynee Mintain Harb-Ro		
Additional sheets used	Y	N	Number of additional sheets:	
Signature:				

<u>Report on Coppiced Hedge at Sledgates,</u> <u>Flyingthorpe.</u>

1:



countryside management

<u>Prepared by</u>: Giles Manners Manners and Bareau Countryside management 01845 537845 email: Giles@mabconservation.co.uk web site: www.mabconservation.co.uk

Date:27/03/2003

Contents:

- Background
- Ecological and landscape assessment
- Hedgerow regulation assessment
- Renovation assessment
- Conclusions

Background

The affected hedge is approximately 62m long. This section was coppiced on the 22nd of March 2003. There remains a smaller section of the same hedge which has not been coppiced.

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Manners and Bareau Countryside Management was contacted on the 25th of March, and asked by Mr John Ryder to provide an independent assessment. Giles Manners visited the same day.

The history of the controversy surrounding this hedge, and the recent coppicing operation, is extensive and it is not within the scope of this report.

Ecological and landscape assessment

The hedge is atop a low roadside retaining stone wall. The dominant species is hawthorn, with holly. Several ash trees have colonised, and have been flailed to the shape of the hedge. There are no standard trees, and no connections to other hedges. However, it is connected to a substantial wooded garden, which has a remnant hedge surrounding it. From an ecological perspective, this qualifies as significant connectivity.

The field side is improved grassland. There is a species-rich hedge bottom margin of 140cm width. The road side is pavement and road (no verge). The retaining stone wall has a good flora.

The following herb species were identified:

Stitchwort (Stellaria holostea) Primrose (Primula vulgaris) Hedge bedstraw (Gallium mollugo) Cleavers (Gallium aparine) Nettles (Urtica dioica) Meadow vetchling (Lathyrus pratensis) Honeysuckle (Lonicera periclymenum) Hogweed (Heracleum sphondylium) Ribwort Plantain (Plantago lanceolata) Arum (Arum maculatum) Sheep's sorrel (Rumex acetosella) Dandelion (*Taraxacum officinale* agg.) Grasses: Bent, Yorkshire Fog, Cocksfoot, Creeping Red Fescue.

The following herb species were reportedly identified in August 2002, but could not be confirmed at the time of our visit:

Cinquefoil (Potentilla reptans) Scarlet Pimpernel (Anagallis arvensis) Sweet Cicely (Myrrhis odorata) Lesser Knapweed (Centaura nigra)

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The following woody species were identified:

Ash Sycamore Hawthorn Holly Dog Rose Bramble (Ivy)

The inspection took place before most plant species have emerged, and so should only be taken as in indication of the range of species contained, rather than as a species list.

The hedge displays a good range of woodland species, and is therefore of considerable age. It takes many years for such a good range of woodland flora to build up, especially in the north east of Yorkshire. Documentary evidence shows that the hedge existed over 120 years ago. It is likely to be much older.

Its position in the landscape is prominent. The hedge is overlooked by several resident's houses, and it is particularly attractive due to its position on top of a retaining stone wall. The hedge is on the outskirts of Fylingthorpe, and so is appreciated by many locals. In addition, it is on the side of a road in the North York Moors National Park, which gives it importance to the visitors to the park, who are often drawn to the attractive coastal landscape around Fylingthorpe and Robin Hoods Bay.

In conclusion, the hedge has a high importance from both a landscape and ecological perspective.

Hedgerow regulation assessment

From the survey results above, we conclude that the hedge qualifies as an "important hedgerow" according to the Hedgerow Regulations 1997. The hedge qualifies under Criteria 8, and perhaps also under criteria 7, though it is extremely hard to confirm this now that the hedge has been coppiced and the brash removed.

Renovation assessment

We measured the average diameter of woody species over 3cm, and the spacing between all such individual hedge plants. We did this over 3 sections of 6m. Section 3 was part of the standing (i.e. not coppiced) section.

We did not include the ash or sycamore, as these are not hedgerow species, and had developed characteristic wide bases due to repeated cutting.

Section 1: average diameter = 7.8 cm; average spacing 52 cm Section 2: average diameter = 7.5 cm; average spacing 49 cm Section 3: average diameter = 10.8 cm; average spacing 37 cm

Range of diameters: 3-20 cm. Range of spacing: 10-150 cm

From these results, we conclude that the hedge was in a state suitable for renovation. In the long term, this hedge would have shown an increasing number of gaps. It was also of concern that the ash plants were shading out significant lengths of the hedge. The spacings were at times well over a metre at the base.

There were no significant areas of rot or damage from stock.

The coppicing had taken the plants down to the correct height. No gapping up or fencing had been carried out.

Coppicing has a dramatic effect on food and habitat availability for birds, and also completely removes the hedge from the landscape. Given the prominence in the landscape of this hedge, and its high ecological value, our advice would have been to recommend laying and gapping-up this hedge, rather than coppicing it. A professional layer would have been recommended, as some root-laying may have been required. Following the laying, we would have recommended gapping up by slot planting, followed by protection from stock by fencing. If there is a significant rabbit population in the field, we would also recommend temporary use of rabbit netting to prevent damage to regrowth.

The timing of the coppicing was not ideal. Hawthorn buds could be seen to be bursting at the time of inspection, implying that sap is rising. In this case, the new growth will be reduced compared to if it had been coppiced when fully dormant. In addition, it is quite likely that nesting birds would have been present in the hedge at the time of coppicing, which would have been in contravention of the Wildlife and Countryside Act 1981. However, the brash had been removed at the time of the inspection, so it was not possible to assess whether birds nests had been destroyed. Our recommendation would have been to complete any renovation by mid-March.

Conclusions

The coppicing of the hedge, while not the best form of renovation, was appropriate, considering the condition of the hedge.

We are concerned, however, that it was carried out too late in the year to maximise the vigour of the new growth and to minimise disturbance to nesting birds.

The coppicing of the hedge should now be completed by planting up the gaps with nursery grown hawthorn, and occasional holly, to density of 4-6 per metre. The coppiced hedge should also now be protected from all grazing, whether by stock or rabbits, by erection of appropriate fencing.

Failure to complete the actions specified in the above paragraph may jeopardise the future well being of the hedge, and may lead to the conclusion that the hedge has been removed rather than restored. Removal of the hedge without submission of a Hedgerow Removal Notice would be considered to be an offence under The Hedgerow Regulations 1997.

It is particularly worrying that coppicing may be used as a means to elicit the longterm removal of a hedge. We hope that the National Park Authority will take all steps necessary to ensure that this is not the case here. It is important that future management is monitored for signs of bad practice, such as grazing of new growth, herbicide treatments, or a failure to gap-up.

We hope that the ongoing review of The Hedgerow Regulations will clarify this area of the law, and may provide some reassurance to the public that 'proper management' cannot be exploited.

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In this case, the erection of protection from grazing, and proper gapping-up, are essential to convince us that the hedge was coppiced in good faith as an act of renovation, rather than the beginning of an attempt to remove the hedge.

HEDGE MARCH2003 SLEDGATES Has BANK + FOOTPATH 60 m length in question. Species in CENTRE 30m. Survey WOODY SPECIES: 1. HAWTHORNE dry STEPHEN 2. ASH PHILLIPS 3. ROSE August 4. HOBLY. 2002 WOODLAND ZOTHER SPECIES: 15. cinquefoil 1. Sweet violet 16, plantain 2. stitchwort 17. scarlet pimpernel 3. primose 18. Sweet cicely 4. Sycamore 19, creeping red Jescue 5. ing 20. dactylus 6: bramble 2'. hedge bedstrant 7. goose-grass 22. leavers 23. sheep sorrel 8. nettle 24 · dandelien 9. vetch, bush. 25. meadow vetchling 10. honeysuckle 26. lesser knapeweed 11. strawberry 27. lords & ladies 12. bindweed 28. cocksfoot 29. yorkshire Jog/mist 13. hogweed 14. smooth sow-thistle 1 Dr. S.B. Sinclair

Common Name	Latin Name
Ash	Fraxinus excelsior
Bindweed	Calystegia spp.
Blackthorn	Prunus spinosa
Bramble	Rubus fruticosus agg.
Bush Vetch	Vicia sepium
Cleavers	Galium aparine
Common Nettle	Urtica dioica
Cow Parsley	Anthriscus sylvestris
Creeping Thistle	Cirsium arvense
Dog-rose	Rosa canina
False Oat-grass	Arrhenatherum elatius
Greater Stitchwort	Stellaria holostea
Hawthorn	Crataegus monogyna
Herb-Robert	Geranium robertianum
Hogweed	Heracleum sphondylium
Holly	llex aquifolium
Honeysuckle	Lonicera periclymenum
lvy	Hedera helix
Meadow Vetchling	Lathyrus pratensis
Red Fescue	Festuca rubra
Red Valerian	Centranthus ruber
Sycamore	Acer pseudoplatanus

Appendix 2. Plant Species Recorded From H1 During 2021 Survey