

I wish to make the case for treating Public Rights of Way (PROW) a separate principal issue for examination (Annex C to the Rule 6 letter).

At present the impact on PROWs is mentioned within the Traffic – Construction and Decommissioning issue but not elsewhere. So, although the short-term impact during these key phases is listed, the longer-term impacts during the operation of the site and into perpetuity are not.

I appreciate that it is noted in Annex C that “It is not a comprehensive or exclusive list of the issues that will be subject to examination and inevitably some issues will overlap or interrelate.”.

PROWs do indeed overlap and interrelate with many of the key issues, particularly Landscape and Visual Impact. But there are other issues, most particularly the requirement for “enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites” in 2.10.36 of NPS EN-3 – National Policy Statement for Renewable Energy Infrastructure, that also need to be addressed.

Despite national and local policy requirements, the applicant has failed to adequately address the issue of PROWs – perhaps partly because they are touched on piecemeal through the documentation.

I refer you the following Relevant Representations:

RR-1253 and RR-143 – from The British Horse Society, Bedfordshire and Cambridgeshire

RR-1252 – from Borough of Bedford Local Access Forum

RR-111 (pages 31-35) and RR-494 (paragraph 15.8) – from the two local Councils

RR-1256 – from the Ramblers

These representations make various points about the way in which PROWs will be impacted by the development (if approved) and there are several suggestions for enhancements to the network, many of which were made to the applicant during consultation but have not been included.

And no doubt PROWs are mentioned in many of the representations from members of the public though I have not read them all.

Given the extensive network of Public Rights of Way (PROW) in and around the site and their role as an essential recreational asset and source of both physical and mental wellbeing for the local community, it is vital that their impacts are examined holistically rather than addressed in a fragmented manner. Accordingly, I ask the Inspector to regard PROW as a principal topic within the Examination.

Can I also draw your attention to 12.13 in the Bedford Borough Council representation (RR-111)– page 35 – which also suggests that PROW are treated as a single Aspect in the examination.

Ann Kennedy, BHS Bedfordshire Access Officer

9<sup>th</sup> March 2026