

BHS Bedfordshire – summary of Relevant Representation (RR-1253)

(Bedfordshire – Sites A and B)

Overview

- The British Horse Society (BHS) does not object in principle to solar farm development where appropriately located.
 - The BHS seeks to ensure:
 - The safety and welfare of horses and equestrians
 - The protection of equestrian businesses
 - The safeguarding and enhancement of public rights of way (PROW)
 - The BHS considers that the current proposal fails to adequately address these matters.
 - The Society therefore objects to the development as currently proposed.
-

Principal areas of concern

- Failure to provide additional bridleway network connectivity
 - Unsafe use of bridleways as construction access routes
 - Impacts on Lodge Farm livery yard
 - Use of roads also used by equestrians for construction traffic
-

Planning policy context

- National and local planning policy supports:
 - Protection of public rights of way
 - Enhancement of access networks where opportunities arise
- Relevant policy includes:
 - National Planning Policy Framework (paragraph 105)
 - Planning Practice Guidance on sport, recreation and public rights of way
 - Defra Rights of Way Circular 1/09
 - Bedford Borough Rights of Way Improvement Plan (RoWIP) 2025–2030
- The BHS notes that the Local Access Forum submission provides fuller policy extracts.

Missed additional bridleway connectivity

- Two additional bridleway links were requested during earlier consultation:
 - One accepted as undeliverable due to land ownership constraints
 - One entirely within Site B and within the ownership of the landowners benefiting from the development
- The deliverable link has not been provided, despite:
 - Being wholly within the development land
 - A similar route having previously been available on a permissive basis
- The requested connection would:
 - Link Green End (via Little Staughton FP8) to the B660 at Brook End
 - Reduce road riding by approximately 3.6 km
- The precise alignment is not critical; the connection itself is key.
- The BHS considers this link would:
 - Provide safe off-road riding
 - Offset adverse impacts from construction disruption
 - Partly mitigate permanent visual harm to Bolnhurst & Keysoe BW37
- Given the permanent nature of the harm, the BHS submits that:
 - The route should be secured as a permanent bridleway
 - A time-limited permissive route would be insufficient

Impact on bridleway landscape and visual amenity

- The BHS strongly disagrees with the conclusion that visual impacts on Bolnhurst & Keysoe BW37 are not significant.
- BW37 runs along a prominent ridge and is valued for:
 - Open, expansive views
 - A strong sense of elevation and openness
- Riders experience the landscape from a higher vantage point than walkers.

- The development would result in:
 - Permanent loss of views to the north and west
 - Serious degradation of views to the south and east
 - These impacts would be experienced along much of the bridleway's length.
 - The BHS submits that these harms should be given appropriate weight.
-

Construction access and safety concerns

- BHS guidance states that:
 - Bridleways, byways and unsurfaced roads should not be used for construction access
 - Where unavoidable:
 - Surfaces should be maintained and restored
 - Safe alternative routes should be provided for equestrians
- The proposals do not follow this guidance.

Pertenhall BW26

- Proposed to carry all construction traffic accessing Site A, including:
 - 1,428 articulated lorries and tippers
 - Staff vehicles
- Route characteristics:
 - Narrow in places
 - Deep ditch along the northern side
 - At least one pinch point where shared use is not feasible
- No diversion is proposed.
- Reliance on banksmen is considered inadequate to ensure safety.

Bolnhurst & Keysoe BW37

- Proposed to be diverted only onto a route immediately adjacent to construction activity.
- Concerns include:
 - Significant construction traffic
 - Noise and vibration from piling and installation works

- Extensive cabling works along approximately 1,340 m
- The diversion does not provide meaningful separation from construction activity.
- The BHS considers the route unsafe and unsuitable for equestrian use.

Alternative diversion

- The BHS identifies a potential alternative route that would:
 - Keep horses away from construction activity and noise
 - Run outside the red line boundary but within the same land ownership
 - The Society submits that this alternative should have been pursued.
 - Additional safety concerns arise at the junction of BW37 and BW40 during construction.
-

Accessibility and equality impacts

- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - The BHS considers this a significant and real-world impact.
-

Impact on Lodge Farm livery yard

- Lodge Farm, Little Staughton:
 - Is a commercial livery yard
 - Is surrounded by Site B
- Construction activity would take place:
 - Within approximately 30 metres of paddocks containing competition horses
 - Adjacent to the ménage
- The BHS previously advised a minimum 100-metre separation.
- This advice has not been incorporated.

- The risk of horses being startled by construction activity is well-established and can have catastrophic consequences.
-

Use of roads also used by equestrians

- Local rural roads are routinely used by equestrians to connect fragmented PROW.
 - These roads are:
 - Narrow
 - Already subject to safety concerns
 - Construction traffic would:
 - Significantly increase risk to riders
 - Potentially render some routes unusable
 - The BHS submits that:
 - Use of such roads has not been minimised
 - Alternative internal access arrangements have not been fully explored
 - Construction traffic routing controls may be insufficient
 - Safe alternatives should be provided where impacts are unavoidable
-

Overall conclusion

- The development would result in:
 - Unsafe conditions for equestrians during construction
 - Permanent loss of amenity on valued bridleways
 - Increased risks on public rights of way and local roads
 - Harm to an established equestrian business
- Opportunities to mitigate harm and deliver policy-compliant enhancements have not been taken.
- The BHS considers the proposal fails to accord with national and local planning policy.
- The Society therefore maintains its objection and submits that the development should not be approved in its current form.