

## THE BRITISH HORSE SOCIETY – BEDFORDSHIRE

### Written Submission for Deadline 1

This submission provides further information on matters raised in RR-1253.

#### Additional bridleway network connectivity

In recognition of the long-term serious adverse impact this development will have on the visual amenity and enjoyment of existing bridleways, the Society argues that additional bridleways should be provided to improve network connectivity. This would be in line with National and Local planning policies, including EN-3 paragraph 2.10.36.

On behalf of local riders, I was pleased to hear the oral commitment of the Applicant's representative to provide the requested connecting bridleway from Little Staughton Green End to the B660 at Keysoe Brook End and trust that this commitment will be reflected in the latest submissions.

The marked map below shows the existing bridleway circuit in Blue, the hazardous road section in Red (about 3.6km) and the suggested footpath upgrade to provide the now promised bridleway connection (although suitable alternatives that achieve the same objective will of course be acceptable):



However, that commitment was made with the limitation that it would be a permissive bridleway only for the duration of the project. As I said in the RR, “The fact that the adverse impacts will be permanent as the views will continue to adversely affected after the solar operations finish justifies this requested link being provided as a dedicated bridleway and not merely permissive, even for the whole of the lifetime of the development until the land is returned to agricultural use.”

In addition, the alternative road route (3.6km) will remain hazardous and is likely to become more so over time due to increasing vehicle volumes.

I therefore ask that this bridleway, which will be much welcomed, be provided on a permanent, dedicated basis as soon as construction work in Site B is completed. This obligation should be reflected in the DCO.

### **Unsafe use of bridleways for construction traffic**

In the RR and in the submission relating to the ExA’s site visit, my concerns about the safety of the use of Pertenhall BW26 and Bolnhurst & Keysoe BW37 as roads for access to Site A were described.

The Society’s position is that it is unacceptable to use bridleways for construction access and this stance strengthens with the volume and timescale of this development.

I find it hard to understand how anyone can consider the arrangements proposed will be safe for users of the bridleways. The risks to riders and horses arise from a variety of sources:

- Proximity of HGVs and other vehicles
- Pinch points in the farmyard with a deep ditch alongside
- Noise of construction - pile driving in particular - alongside
- Noise and activity related to the cable laying along nearly a mile of bridleway

The only way to address these issues is to separate the horses from the risks. In practice, these risks will deter lawful use of the bridleways and undermine the Applicant’s commitment to maintain access. I have asked for alternative diversions to increase the separation so that lawful users can continue to use the bridleway network throughout the construction phase, as promised.

For Pertenhall BW26 I have suggested putting a diversion on the other side of the hedge from the farmyard and construction access route. For Bolnhurst & Keysoe BW39 I have suggested that a diversion can be created along other tracks and headlands to bypass the construction area. This is shown in blue below (on an extract of the environmental masterplan APP-121):



## Use of roads also used by equestrians for construction traffic

Although [REDACTED] did explain how being ridden on roads can be beneficial to young competition horses, leisure riders seek to avoid the roads wherever possible and only use them to make connections to and between off-road bridleways.

Horses are powerful 'flight' animals that can become distressed by sudden noises or fast, large or close vehicles, leading to unpredictable movements and potentially accidents to themselves, riders and other road users. The Highway Code advises passing at no more than 10mph and with at least 2m of space (s215).

Large vehicles such as HGVs can be particularly daunting to a horse. These vehicles can be unfamiliar and intimidating to a horse as they are bigger than other vehicles, the noise may startle them, or the air brakes can cause alarm.

Although HGVs account for only 1.5% of vehicles in the UK (<https://www.smmmt.co.uk/vehicle-data/motorparc-vehicles-in-use-uk/>), they account for 5% of incidents between horses and vehicles reported to the BHS in 2025 and 5% of horse injuries, 14% of rider injuries; over 90% of these reports related to HGVs passing too fast and/or too close.

Each of the country roads around Sites A and B is used by equestrians (and also by cyclists). There appears to be no effort made to minimise the use of these roads. There are three sections of road that are planned to be used by construction traffic, each roughly 1km, and in each case there is scope for an alternative safer option available within the development site:

1. All traffic between Sites C and B (so all deliveries etc for both Sites A and B – nearly 2,400 loads or 4,800 trips) will be directed via the narrow Great Staughton Road rather than on an internal access track along the line of or alongside the cable corridor between Site C and B.
2. Access to the southern and northern sections of Site B will use Green End Road – the volume of traffic is not easy to estimate but alternative internal tracks could be provided, requiring only a crossing of Green End.
3. Access to the very northern sections of Site B – those to the north of Great Staughton Road around Kangaroo – will use that road from the junction with Green End Road. Once again, internal routes could be used with just crossings of the road.

APP-125 shows the current proposed routes as black dotted lines in Figures 2-5c and 2-5d.

Section 1 is used by horses from the livery yard at Hawthorn Stables to access the nearest bridleways and the other two form part of the road section of the circuit illustrated above (i.e. part of the 3.6km Red route).

In summary, these three sections of road do not need to be used for construction traffic access as alternatives could be provided within the site – with just three road crossings required. For regular maintenance vehicles during operation, it would be acceptable for the lower number of smaller vehicles involved to use the local roads. But for any major repowering or replacement during the lifetime of the site and for decommissioning, internal routes should again be used, which might well involve some detailed planning but should be achievable.

The ExA will have seen how narrow the roads are and the damage already done to the verges by HGV traffic – there is not enough space for two large HGVs to pass safely and non-motorised users of these roads (not just horseriders but cyclists as well) feel intimidated by even the current relatively low level of use.

At the Issue Specific Hearing, there was some debate about how the Applicant could ensure that all deliveries and staff vehicles would travel from the A1 via Site D. The BHS shares the common concern of locals that this is unlikely to occur in practice and that all the roads in the area will see an increase in traffic during construction (and decommissioning and any refurbishment that may take place).

We ask that the ExA ensures that the DCO achieves this objective and that action against breaches of the agreed traffic management plan can be taken promptly.