

SUMMARY OF THE BOROUGH OF BEDFORD LOCAL ACCESS FORUM REPRESENTATION – RR-1252

Context and Policy Background

- Local Access Forums (LAFs) advise decision-makers on improving public access for outdoor recreation and sustainable travel.
 - National policy requires planning decisions to protect, enhance and extend public rights of way (PROWs), including improving connectivity.
 - Planning Practice Guidance (PPG) should be given equal weight to the National Planning Policy Framework (NPPF).
 - DEFRA guidance recognises PROWs as:
 - Integral to recreation, sustainable transport, tourism and rural economies
 - Important in the daily lives of many people
 - The Borough's Rights of Way Improvement Plan (RoWIP) 2025–2030 identifies PROWs as:
 - A key cultural, community and heritage asset
 - A crucial recreational and sustainable transport resource
 - helping foster physical and mental well-being
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Overview of BOBLAF Position

- BOBLAF previously commented on the development in November 2023.
 - Some concerns have been addressed, but we do not consider that the details of the application address the need not only preserve the existing public access to land but also to improve and extend that access
 - Overall concerns relate to:
 - Construction impacts on PROWs
 - Long-term and permanent impacts on users' experience
 - Missed opportunities to enhance the PROW network
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Key Concerns (Summary)

- Inadequate and unsafe PROW diversions during construction
 - Potential construction noise affecting PROW users outside core working hours
 - Permanent adverse impacts on views from PROWs
 - Narrow “corridor” experiences along routes within the site
 - Unclear or inappropriate PROW surfacing and maintenance proposals
 - Insufficient new or extended public access to compensate for impacts
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Construction Diversions

- No PROW closures proposed, which is welcomed, but Construction activity will significantly reduce route attractiveness
- The diversion proposed for Bolnhurst & Keysoe 37 and the lack of diversion of Pertenhall BW26 do not adequately protect users from the adverse impacts of construction

Bridleway BW37 (Bolnhurst & Keysoe)

- Proposed diversion runs immediately alongside the existing track.
- Considered unsafe due to:
 - High volumes of construction traffic
 - Noise and vibration from array installation
 - Extensive cable laying along the route
- Insufficient separation between users and construction activity.

Pertenhall BW26

- Not proposed for diversion despite:
 - Narrow track width
 - Deep ditch and limited passing space
 - Heavy construction traffic (over 1,400 HGV movements for Site A)
- Together with BW37, forms a continuous bridleway route at risk.

Alternative Proposal

- British Horse Society (BHS) has proposed a safer alternative diversion.
- Supported by BOBLAF, despite being outside the red line boundary.
- BOBLAF considers a whole-route diversion essential.
- Without this, safety closures may become necessary, contrary to stated intentions.

Other Diversions

- Pertenhall FP29 diversion is acceptable.
 - Concerns remain about safety on the narrow linking track from the road.
 - Traffic management could mitigate these issues.
 - Short diversions for cable laying are generally acceptable.
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Construction Noise

- Core construction hours stated as:
 - 08:00–18:00 weekdays
 - 08:00–13:00 Saturdays
 - No work on Sundays or Bank Holidays
 - However, the Order allows out-of-hours work if noise is not audible at the site boundary.
 - This test does not consider audibility on PROWs within the site so users may still be exposed to construction noise outside core hours.
 - BOBLAF considers this unacceptable and requests Removal or amendment of the exception to include audibility from PROWs.
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Impact on Views for PROW Users

- Sites A and B directly affect:
 - ~4 km of bridleways
 - ~11 km of footpaths
- Many routes currently enjoy open countryside views.
- Additional PROWs beyond the site will also experience visual impacts.

Key Points

- No PROWs are permanently lost, but:
 - Enjoyment will be significantly reduced
 - Loss of views will be permanent
- Hedgerows and trees will, quite rightly, remain after decommissioning, continuing impacts.

Inadequate Assessment

- Landscape and visual assessments fail to reflect the extended experience of users travelling long distances through the site
- For example, users on BW37 and BW26 experience impacts continuously over ~2 km (approx. 20 minutes).
- Documentation incorrectly describes these views as “short duration”.

Screening and Sensitivity

- Disagreement with assessment that:
 - User sensitivity is only medium to high
 - Effects become insignificant by year 10
- Tree planting will permanently block northern views from Bolnhurst & Keysoe 37.
- Doubts about the realism of vegetation growth assumptions shown in photomontages.
- Existing 10-year-old planting elsewhere has proven ineffective.

Viewpoints

- Only 12 of 53 viewpoints assessed.
- BOBLAF urges the Inspector to:
 - Visit the site
 - Walk affected PROWs
 - Pay particular attention to BW37/BW26 and the junction at VP33.

Mitigation Expectation

- Permanent adverse impacts should be offset by tangible improvements to public access if the scheme is approved.
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PROW Widths and Corridor Effects

- 10 m buffers are welcomed but still create corridor-like experiences.
 - Opportunities exist to widen corridors by Setting back screening hedges closer to array fencing.
 - This could be achieved on several identified footpaths across Sites A and B.
 - Wider corridors would:
 - Reduce tunnel-like effects
 - Improve variety and enjoyment
 - Avoid intimidating or monotonous walking experiences
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PROW Surfaces and Maintenance

- All damaged surfaces must be reinstated.
 - Any changes must be agreed with the Council's Rights of Way team.
 - Proposal to mow grass paths 2 m wide is welcomed, but:
 - Photomontages show inconsistent surfacing.
 - LEMP states species-rich grassland will not be cut in summer, creating a contradiction.
 - BOBLAF requests:
 - PROWs to be maintained at appropriate grass height year-round
 - Clear commitments in both the PROW Management Plan and LEMP
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Improving and Extending Public Access

- Additional short footpaths in Little Staughton are welcomed but:
 - Insufficient to compensate for overall impacts
- Concern that:
 - New paths could be removed if deemed to cause antisocial behaviour
 - Any removal should only occur with Council agreement

Missed Opportunities

- Access proposals unchanged since previous consultation.
- Requests for wider community benefits have been ignored.

Requested Additional Routes

- **Site A**
 - Perimeter route linking B&K FP32 to Pertenhall FP2
 - Dedication of track from Green End to Pertenhall FP29 as a footpath
- **Site B**
 - Bridleway linking Green End, Little Staughton and Brook End (B660)
 - Perimeter route linking B&K FP36 to B&K FP13
 - Perimeter route linking Little Staughton FP26 to B&K FP47
 - Connection from eastern end of LS FP8 to LS FP1 via site access tracks

Principles

- These routes would:
 - Improve connectivity
 - Create circular routes
 - Partially compensate for loss of views
 - Routes should be:
 - Dedicated PROWs, not permissive paths
 - Permanent, reflecting the permanent nature of impacts
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Open Access and Green Infrastructure

- Larger green infrastructure areas present opportunities for:
 - Informal public access
 - Open grassland for recreation (e.g. picnics, informal play)
- At least one such area should be designated for public use.

- This would align with RoWIP objectives for:
 - Well-being
 - Nature connection
 - Community benefit
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Conclusion

- The development is large-scale with significant cumulative impacts on North Bedfordshire.
- Opportunities to provide meaningful benefits to local residents have not been taken.
- If approval is recommended, BOBLAF asks that the scheme be amended to address its concerns and
 - Public access is preserved, enhanced and extended
 - PROWs continue to deliver recreation, sustainable transport and health benefits in line with local and national policy