

THE BOROUGH OF BEDFORD LOCAL ACCESS FORUM (“BOBLAF”)

WRITTEN SUBMISSION FOR DEADLINE 1

This submission provides further information on matters raised in RR-1252, primarily maps relating to the access improvements requested in our Relevant Representation.

Our comments in the RR all remain valid and this additional information should be read alongside that original representation. This set out our key concerns which are summarised as:

- 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

Requested Additional Routes

Attached are 4 photographs of sheets of the environmental masterplan APP-121 which show highlighted in blue the proposed additional access. Below each request is presented separately for ease of reference, especially where they overlap sheets of the masterplan.

Our requests can be summarised as:

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

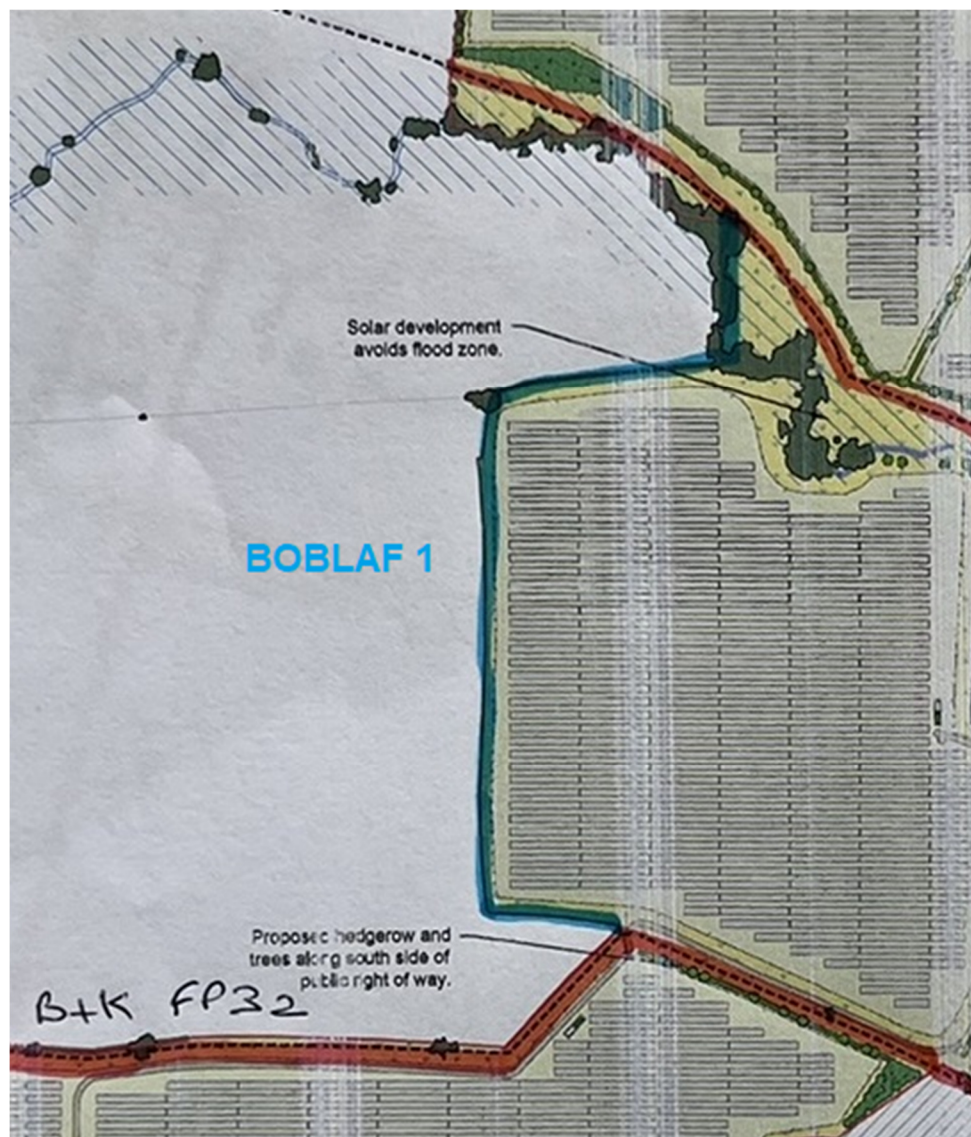
Request 1 - Perimeter route linking B&K FP32 to Pertenhall FP2

APP-121 Figure 2-1b

This additional footpath, outside the perimeter fence to the west of Site, would provide:

- A connection between the two footpaths, thereby increasing the options for circular walks; and
- Views to the west towards Swineshead, partly compensating for views lost elsewhere

Whilst it would be more pleasant to have hedging between the footpath and the fence, this would not be an absolute necessity.



Request 2 - Dedication of track from Green End to Pertenhall FP29 as a footpath

APP-121 Figure 2-1b

This track extends the road past Manor Farm at Green End, Pertenhall to FP29. The footpath is currently recorded as a dead-end but agreement to dedicate the link would avoid the need to make a definitive map modification. BOBLAF understands that the Applicant may have indicated a willingness to accept this.



Request 3 - Bridleway linking Green End, Little Staughton and Brook End (B660)

APP-121 Figure 2-1e and Figure 2-1f

At the Open Floor Hearing a representative of the Applicant stated that this request would be accepted. This has not yet been confirmed in writing and so we include it for completeness.

BOBLAF considers that this route (and indeed all our requests should be dedicated, not permissive).

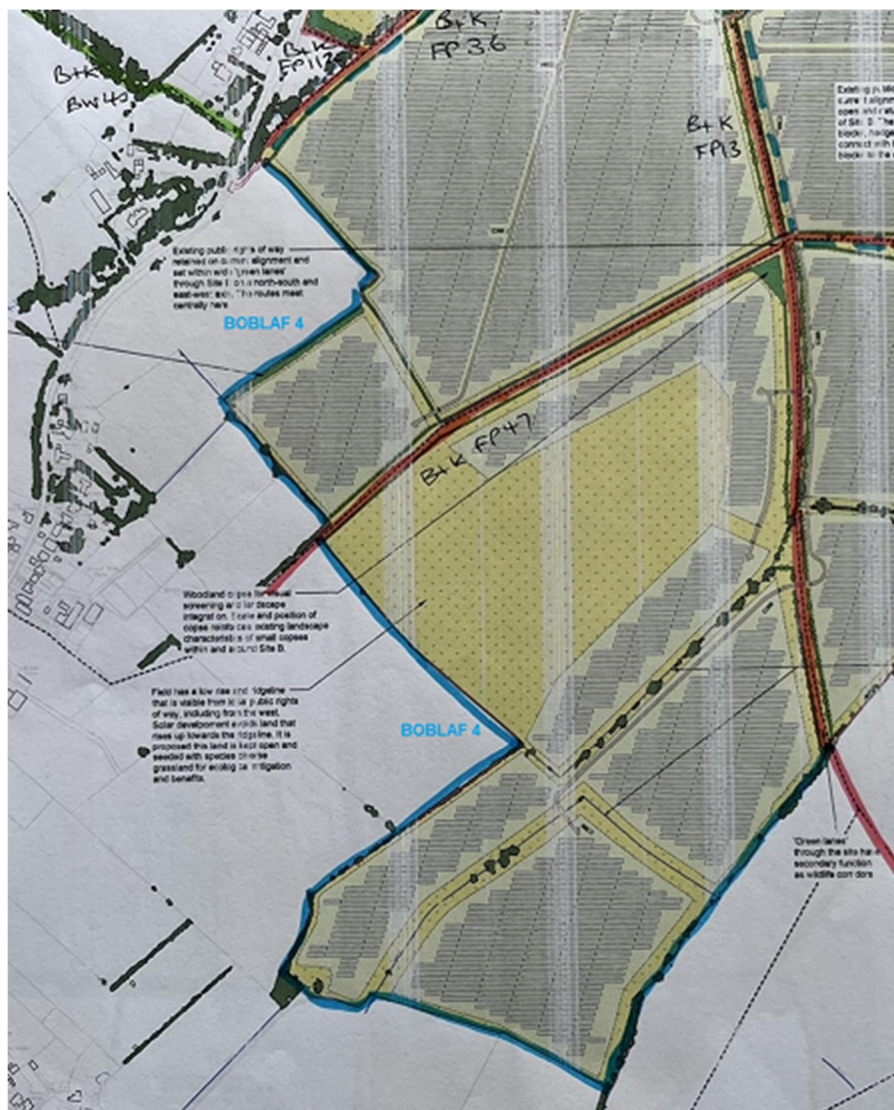
The map of this route has been provided to you by The British Horse Society and is not duplicated here. It is however marked with blue dashed lines on the attached sheets of the masterplan.

Request 4 - Perimeter route linking B&K FP36 to B&K FP13

APP-121 Figure 2-1e

This route to the west of Site B would provide

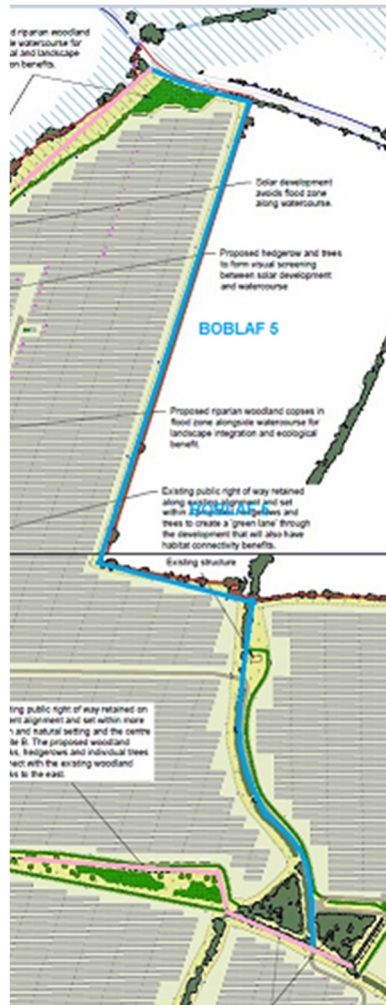
- A connection between these two footpaths and also B&K FP47, thereby increasing the options for circular walks; and
- Views to the outside of the development, partly compensating for views lost elsewhere
- A walk alongside a large area of grassland with the opportunity to observe any wildlife there



Request 5 - Perimeter route linking Little Staughton FP26 to B&K FP47

APP-121 Figure 2-1d and Figure 2-1e

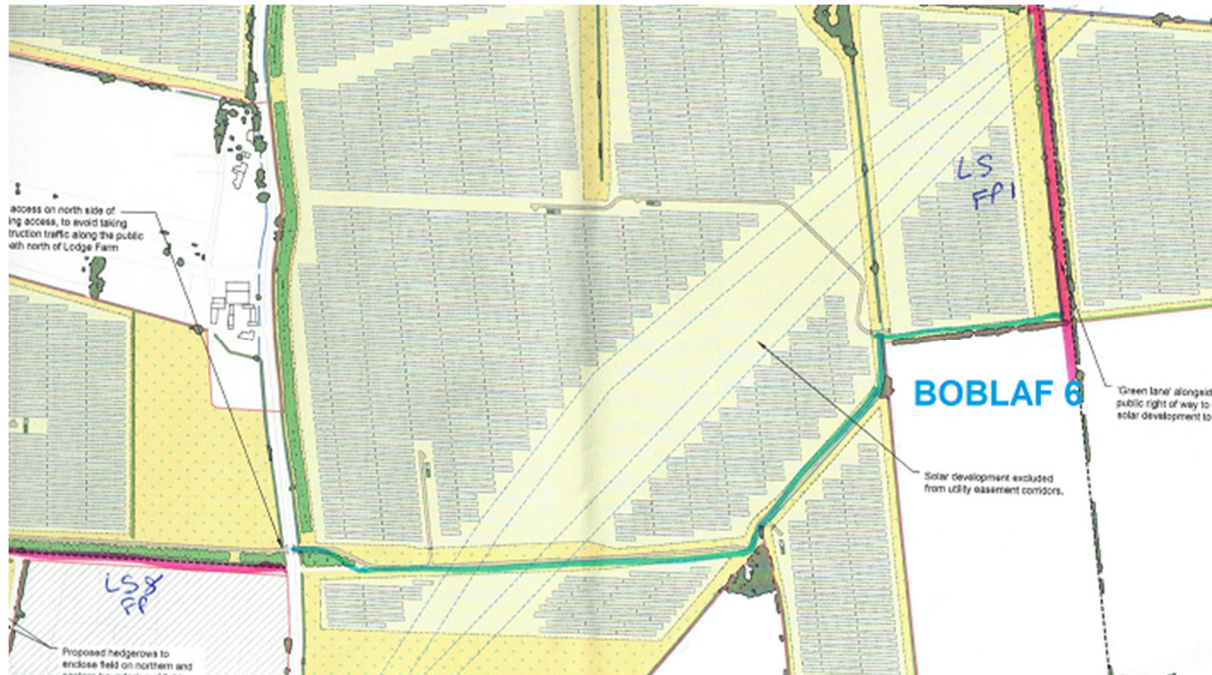
Another route that provides good connectivity to achieve a circular walk, particularly beneficial to dog-walkers in the Pertenhall and Keysoe, whilst offering some more open views.



Request 6 - Connection from eastern end of LS FP8 to LS FP1 via site access tracks

APP-121 Figure 1-2f

At present the connection between these two footpaths is made via the road, approximately 1km on a narrow road with limited verges, one T junction and a blind bend. This connection, through the site, would be much safer even though mostly of site access roads.



As we said in our RR, these routes (and indeed the few permissive routes already included in the proposal) should be provided on a dedicated basis as the impact of the development on views will be permanent. If the ExA is not inclined to accept that and determines that permissive routes are appropriate, then this permission must extend throughout the life of the solar facility and until the land is returned to agriculture.

We omitted reference to EN-3 in our RR, which reinforces the more general local and national policies regarding public rights of way in solar developments by saying in 2.10.36:

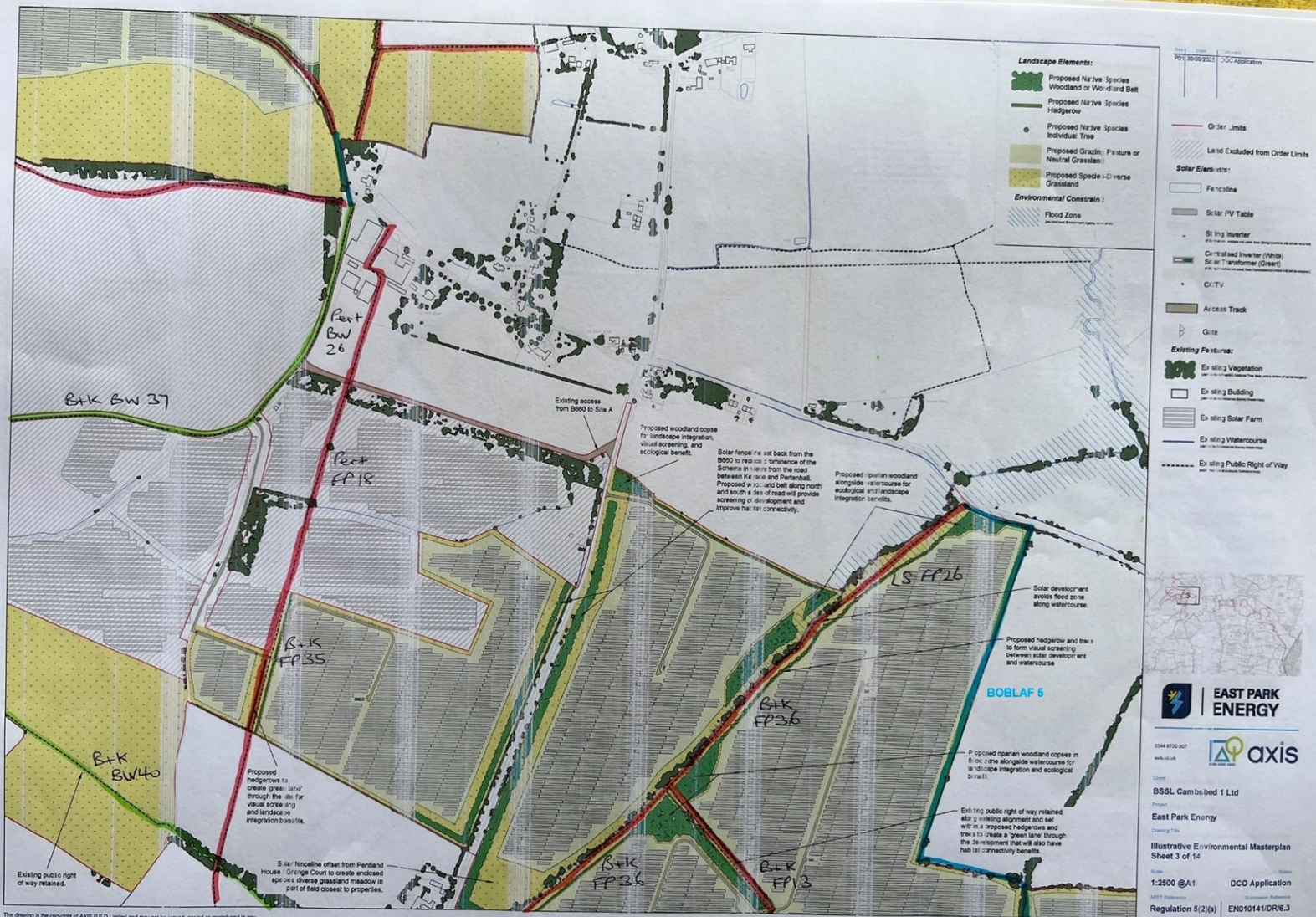
Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights of way or the creation of permissive paths), taking into account, where appropriate, the views of landowners.

We restate our belief the opportunities for the developers and landowners to provide some benefit to local residents (and indeed those from further afield) has been largely ignored. Our proposals seek to ensure that the recreation, sustainable transport, enjoyment and health benefits of the PROW network are preserved and enhanced, in accordance with both local and national policy.

DCO powers

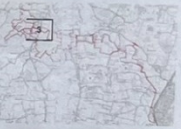
BOBLAF does not consider that the Applicant should be given powers to alter, remove or replace (ie divert) existing public rights of way, other than those specifically defined in the schedules and rights of way and access plans. The reference which allows unspecified changes to public rights of way should be removed. (Schedule 9 s1(b) of the draft DCO – APP-016)

Any such further changes to the existing PROW network should be subject to the appropriate legal processes as required in the Highways Act.



- Landscape Elements:**
- Proposed Native Species Woodland or Woodland Belt
 - Proposed Native Species Hedgerow
 - Proposed Native Species Individual Tree
 - Proposed Grazing Pasture or Neutral Grassland
 - Proposed Species-Diverse Grassland
- Environmental Constraints:**
- Flood Zone

- Order Limits**
- Order Limits
 - Land Excluded from Order Limits
- Solar Elements:**
- Fence Line
 - Solar PV Table
 - String Inverter
 - Centralised Inverter (White) Solar Transformer (Green)
 - Cr/TV
 - Access Track
 - Gate
- Existing Features:**
- Existing Vegetation
 - Existing Building
 - Existing Solar Farm
 - Existing Watercourse
 - Existing Public Right of Way



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Client:
BSSL Cambridge 1 Ltd

Project:
East Park Energy

Drawing No:
Illustrative Environmental Masterplan
 Sheet 3 of 14

Scale:
1:2500 @A1 DCO Application

Regulation 5(2)(a) | EN010141DR08.3

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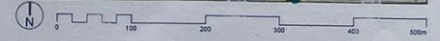
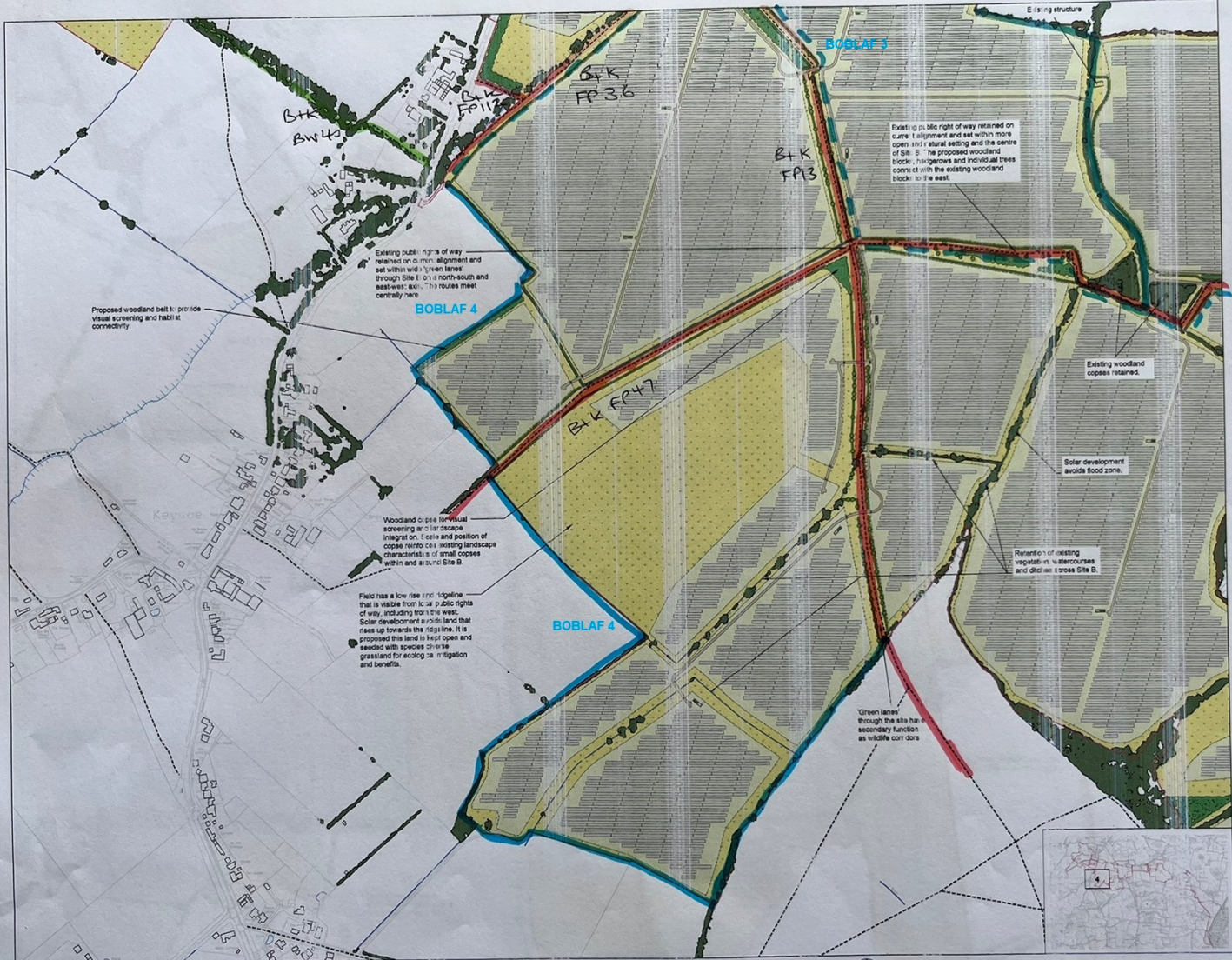


Figure 2-1d P01



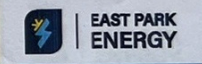
Rev: 1 Date: 30/09/2023
 P01: 30/09/2023 DCO Application

- Order Limits**
- Order Limits
- Solar Elements:**
- Fence line
 - Solar PV Table
 - String inverter
 - Centralised Inverter (White)
 - Solar Transformer (Green)
 - CCTV
 - Access Track
 - Gate

- Existing Features:**
- Existing Vegetation
 - Existing Building
 - Existing Watercourse
 - Existing Public Right of Way
 - Proposed Permissive Access

- Landscape Elements:**
- Proposed Native Species Woodland or Woodland Belt
 - Proposed Native Species Hedgerow
 - Proposed Native Species Individual Tree
 - Proposed Grazing Pasture or Neutral Grassland
 - Proposed Species-Diverse Grassland

- Environmental Constraint:**
- Flood Zone



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Client:
 BSSL Cambel 1 Ltd

Project:
 East Park Energy

Drawing Title:
 Illustrative Environmental Masterplan Sheet 4 of 14

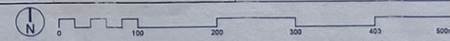
Scale:
 1:2500 @A1 DCO Application

Regulation 5(2)(a) | EN010141/DR/6.3

Figure 2-1e P01

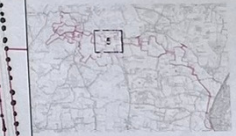
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- Order Limits**
- Land Excluded from Order Limits
- Solar Elements:**
- Fence
 - Solar PV Table
 - String Inverter
 - Central Inverter (White)
 - Solar Transformer (Green)
 - Acoustic Fence around Centralised Inverter/Solar Transformer
 - CVTV
 - Access Track
 - Gate
- Existing Features:**
- Existing Vegetation
 - Existing Building
 - Existing Buried Utility Easement
 - Existing Watercourse
 - Existing Public Right of Way

- Landscape Elements:**
- Proposed Native Species Woodland or Woodland Belt
 - Proposed Native Species Hedgerow
 - Proposed Native Species Individual Tree
 - Proposed Grazing Pasture or Neutral Grassland
 - Proposed Species-Diverse Grassland
- Environmental Constraints:**
- Flood Zone



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Client: BSSL Cambus 1 Ltd
Project: East Park Energy
Drawing Title: Illustrative Environmental Masterplan Sheet 5 of 14
Scale: 1:2500 @A1
DCO Application Reference: EN010141/DR/6.3

Figure 2-1f P01



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