

The Borough of Bedford Local Access Forum (BOBLAF) comments on the Applications responses (REP1-055) to its Relevant Representation (RR-1252)

This document uses the Applicant's references in Table 14 of its response document.

BLAF-RR-01 – BOBLAF completely agrees with the BHS that these proposals to address the safety concerns raised are wholly inadequate and will not deliver the safe conditions required for users of the bridleways affected. We have read the BHS detailed submission on this point and do not feel the need to comment further other than to confirm that we agree with the BHS position that a safer diversion must be provided, especially as it is within the gift of one of the landowners who is benefitting from the scheme.

BLAF-RR-02 – BOBLAF is surprised that the response is merely to state that the point is noted without any confirmation that the safety issue we raise will be addressed.

BLAF-RR-03 – It is not much comfort to know that there will be 'very little noise within the Site' when using the PROWs that are within the Site out of construction hours. Some of the PROWs are quite a distance from the Site boundary and so could be affected by fairly significant out of hours noise. Part of the enjoyment of a walk in the countryside is the relative silence and the sound of birdsong. This response gives no comfort that these will be able to be enjoyed out of working hours. BOBLAF notes that at present some tractor noise may be heard at times during the year, particularly during harvest, but this agricultural, countryside noise is quite different from construction noise.

We continue to consider that this Requirement should be amended to reflect audibility from any PROW, if the exception to allow certain work outside standard hours is not removed entirely.

BLAF-RR-04 and 05 – The assessment presented in the examination documents does not, in our view, present a full assessment of the impact on PROWs.

Whether the LVIA has or has not been prepared in accordance with guidance, we take issue with the conclusions that the year 10 visual impact at VP9 and VP12, which is rated as Moderate Adverse, can be viewed as Not Significant. 50% of the views from this Bridleway will be eliminated by the trees to be planted as screening. This is over a distance of about 1km. How can this be deemed insignificant?

We remain of the view that the judgements made within the LVIA do not fully take into account the continuing impact over the length of a ride or walk.

BLAF-RR-06 – we confirm our view that this viewpoint is a point that the ExA should visit. It will give him a chance to compare the visualisations with the reality of the current scene.

BLAF-RR-07 – the Applicant's response makes no sense – how does moving screening planting back from the PROW and closer to the fencing impact on the balance between

visual impact and retaining public access? Moving the hedging back would widen the corridors and reduce visual impact whilst retaining public access.

BLAF-RR-08 – The amendments to the oPROWMP are to be welcomed but the Council's rights of way team should confirm that these improvements are sufficient and robust enough to ensure that damage to surfaces will in fact be repaired.

BLAF-RR-09 – This confirmation is welcomed but again we wish the Council's rights of way team to confirm that these oPROWMP terms are sufficient and robust enough to ensure that the routes are maintained to an appropriate standard and can be enforced if necessary.

BLAF-RR-10 -the wording re closure due to ASB is noted but 'consultation with the LPA' is not sufficient. It must be with the consent of the LPA and notification to the public should be made as it would be in the case of a TRO on a dedicated PROW.

BOBLAF continues to consider the offered additional access (including the additional FP upgrade to BW referenced in BLAF-RR-11) offers insufficient benefit to local residents.

BLAF-RR-11 – we had requested 6 additional routes and, whilst we are of course, happy to see the agreement to provide the connecting bridleway across Site C, the others have been rejected or at least not yet agreed.

The excuse that our first request would require a bridge over the brook is unacceptable as the cost of such a structure must be insignificant in the overall context of the development.

The second - we hope that the landowner will see the sense in formalising the use of the short section as it will be to both his benefit as well as the public's given reduced potential liability.

The third is most welcome though it should be noted that this is not new public access as it involves the upgrade of FPs to BWs. We also insist that this this should be a dedicated route (as we would wish all additional access to be).

As regards the fourth, we feel that the Applicant has intentionally missed the point that this suggestion provides a route that has open views. It is true that there is already a connection between the two footpaths – the suggested route would thus create a circular route.

Regarding our final suggestion, we hope that the consultations with the landowner will bear fruit. We understand that the LPA (BBC) has also requested a connection here and for it to be a bridleway across to Spring Hill Road – we fully support this request which in effect replaces ours.

BLAF-RR-12 – We continue to believe strongly that new routes should be provided on a dedicated basis unless there are genuine operational reasons why this is not possible. The landowners' lack of willingness is disappointing, particularly given the extent to which they

will benefit from the development. We ask the Applicant to raise this once more with the landowners.

As to planning balance, the low level of additional permissive routes offered in such a large area suggests to us that very limited positive weight can be given to these. They certainly fall a long way short of compensating for the severe adverse effects on the PROWs, both within the site and within sight of it, and their users.

BLAF-RR-13 – this response is disappointing, but we acknowledge that there is the potential for conflict with the ecological objectives of the scheme if open access areas were provided in the larger green infrastructure. But there does remain the possibility of doing so alongside some of the PROWs in wider corridors – especially if our suggestion that some corridors should be widened is accepted. See BLAF-RR-07.