

The Borough of Bedford Local Access Forum (BOBLAF) comments on the Applicant's responses (REP2-044) to its Written Representation (REP1-095)

This document uses the Applicant's references in Table 8 of its response document.

BLAF-WR-01 – This response would imply that the Applicant can see benefits in providing such a route but can not do so due to the need to provide an additional bridge. The cost of a footpath bridge must be insignificant compared to the total cost of this development and would not appear to us to be sufficient grounds for rejecting our proposal.

BLAF-WR-02 – A definitive map modification order can easily be made for this short connecting route based on the fact that it has been used by local walkers for decades. This will involve the significant work by Council officers, as well as by users and the landowner, so our suggestion was to avoid this workload. We hope that the landowner will see the benefit in agreeing to this short connection being recorded on the definitive map and will agree.

BLAF-WR-03 – The provision of this connecting route for horses is welcomed but should be a definitive route. In BHSB-WR-02 in Table 10 of the same document, the Applicant acknowledges that the provision of a permissive route is a more limited public benefit than a permanent PROW. The route is already a permanent PROW, being a footpath, so the impact of agreeing to an upgrade to bridleway status is not a major change for the Applicant or the landowner and we continue to support the BHS's request for dedicated status.

The Applicant has not responded to the comment that all our requested routes should be dedicated.

BLAF-WR-04 – the Applicant is correct that there is already access between Bolnhurst and Keysoe Footpath 36 and Bolnhurst and Keysoe Footpath 13 but this additional access would create additional circuits that would be attractive to local walkers. This can clearly be seen in the diagram presented in our WR (Request 4).

Further, the existing footpaths are all within the development, within corridors, whereas the additional route we have suggested would provide open views, particularly to the west, similar to those that are being lost for these existing footpaths. The suggested route would also pass a section of grassland providing an opportunity to view wildlife.

BLAF-WR-05 – the Applicant is correct that there are mature hedges along much of the proposed route – but there are several gaps. Furthermore, the provision of such a route would provide a circuit for local walkers, particularly those in the southern part of Pertenhall, connecting to FPs 26, 13 and 47.

BLAF-WR-06 – we hope that the consultations with the landowner are successful as this would be an important improvement in PROW user safety.

The applicant has not responded to the rest of our WR presented in this comment box – that all additional access should be provided on a permanent basis. And that EN-3 reinforces national and local policy that additional access should be provided.

We note that in document PDA-018, the Applicant has made the case that the Scheme should be determined in accordance with the 2024 NPPs. In our WR we quoted from the para 2.10.36 of the 2025 edition of EN-3 which reads

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.

This wording was in para 2.10.44 of the 2024 NPPs' EN-3 and so does apply to this Scheme.

We concluded that “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.”

Our position is unchanged by the disappointing responses included in the Applicant's document.

BLAF-WR-07 – We will leave it with the host authorities to determine whether they are satisfied that the DCO provides sufficient powers for them to ensure that changes to PROWs are made appropriately.

Overall, we find these responses somewhat dismissive and lacking in a genuine and balanced assessment of our proposals. The ExA will no doubt balance the adverse impacts on PROWs with the limited permissive mitigation offered.