

**British Horse Society Bedfordshire (BHS Beds) comments on the Applicant's responses (REP2-044) to its Written Representation (REP1-099)**

This document uses the Applicant's references in Table 10 of its response document.

**BHSB-WR-01** – Noted.

**BHSB-WR-02** - 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 but would be of significant long term benefit to local riders.

The Society remains of the view that only dedication (or agreed creation) can provide an appropriate mitigation for the permanent adverse impact on views from other bridleways as a result of the development.

The ExA will no doubt consider the balance the of the adverse impacts on PROWs and the limited permissive mitigation offered.

**BHSB-WR-03** – In our response (REP2-061) to the Applicant's responses to our RR-1253 (REP1-055 and REP1-056), we set out in some detail why we find the Applicant's proposals to address our safety concerns totally implausible and impractical.

In summary,

- the proposed banksman will not be able to see all approaching horses,
- the suggestion that lorries stop or follow at a distance is unrealistic and could create further safety issues, and
- the idea that instructions to stop work can be communicated in time is implausible.

I would like to point out that, as I no longer ride, this issue is of no direct concern to me. I am however concerned about the safety of local riders and their horses, particularly the young boy I have previously mentioned who has no access to alternative off road routes.

The Society remains of the view that the only safe option here is to provide an alternative diversion further away from the construction traffic and activity. This is within the gift of one of the landowners who is benefitting from this development. To continue with the current proposals is to close the bridleway to equestrian users during construction hours, without acknowledging that this is the case. And thus to deprive some local riders of access to off-road riding for some 18 months (possible two summers).

Alternatively, the Applicant could consider removing the panels from the section alongside the bridleway on the ridge at the western end of the development. This has already been suggested by Bolnhurst Keysoe Parish Council to address visibility issues (REP-128).

Access to and cabling from the other panels in Site A would be via the access roads within the northern array areas. This would remove the need for any construction traffic to use the bridleway to the west of the Manor Farm, save for about 100m to reach the track to the panels within Site A that are next to the B660. Array installation and cable laying on or adjacent to this BW could be eliminated. There would be some installation noise alongside BW44 near Middle Lodge, which should be manageable for the presumably small period of time involved, as alternative equestrian routes would be available. The traffic associated with the green infrastructure installation could also be diverted away from the BWs for the most part and presumably the work involved would not be unduly noisy nor require the vibration inducing pile driving associated with panel installation.

**BHSB-WR-04 and 05** – The Applicant acknowledges the concern about the safety of horses on the road but fails to accept that more could be done to reduce the risk to local riders.

It appears to the Society that the statement that “The Applicant has sought to minimise where possible use of the local highway” is inaccurate. We have pointed out three changes that could be made to the construction access strategy that would reduce significantly the use of roads used by horses (and cyclists) as part of the prescribed routing for construction traffic.

The safety measures referred to (driver induction and awareness, compliance with the Highway Code, speed management and signage) are potentially helpful though we are all aware that HGV drivers are not 100% reliable in observing such things. The only sure way to reduce the risk is to genuinely minimise the use of these small country lanes by HGVs.