

A428 Black Cat to Caxton Gibbet

Roxton Parish Council (RPC) response to Highways England's (HE) supplementary consultation June 2020

Dated: 27.07.20

To: Mr Lee Galloway (Highways England)
Mrs Anne-Marie Rogers (Highways England)

Cc to: Mr Richard Fuller (MP for north east Bedfordshire)
Mr Dave Hodgson (Mayor of Bedford Borough Council)
Mr Tom Wootton (Ward Councillor for Roxton/Wybboston Ward)
Mrs Kaye Couzen (Chair of Wybboston, Chawston & Colesden Parish Council)

Introduction:

RPC welcome the decision to extend the consultation period to the 26th of August 2020 for selected individuals. However given government policy not to discriminate against the digital disengaged RPC request that the consultation date be extended to all until 26th August.

In June 2019 RPC submitted extensive comments on the consultation documents, to date RPC have not received a reply to the matters raised (these comments can be found in appendix A). RPC request Highways England (HE) respond to their June 2019 comments outlining how/where the proposed changes address these comments.

The following outlines the comments from RPC to Highways England's (HE) consultation documents and should be read in conjunction with RPC online submission response.

In compiling these comments RPC have canvassed opinions from residents who generally have understandable concerns with the impact of the development during construction and afterwards. Noise pollution and the lack of measures to protect all vulnerable road users are of continued concern.

To date no attempt has been made by HE to hold further discussions with RPC as promised during the online presentation held on 26th June 2020. Not only is this disappointing, it demonstrates a failure by HE to properly engage with the community representatives of the people who will be most affected by the proposed works in and around Black Cat.

RPC has reviewed the June 2020 documents against the NPPF 2019, Bedford Borough Council Local Plan 2030 and the Design Manual for Roads & Bridges. The proposed works should comply with all of these documents however RPC have found a number of fundamental areas of noncompliance with these policies.

1. Para 98 of the NPPF states:

Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

The glossary in the NPPF defines national trails as:

Long distance routes for walking, cycling and horse riding.

The lack of provision to accommodate horses in the proposals fail to meet this fundamental requirement of the NPPF. The scheme should be revised in order for these proposals to comply with the above policy.

2. Bedford Borough Council Local Plan 2030

Section 12 deals with *Plan implementation and infrastructure delivery* policy 91 deals with Access to the countryside and it of significant relevance, adopted policy 91 states:

Policy 91 – Access to the countryside

In considering proposals for development all of the following criteria will apply:

- i. Safeguarding of existing public rights of way and ensuring the existing routes are incorporated into the proposed development or an appropriate diversion is provided.*
- ii. Where diversions to the existing public rights of way are proposed, it should be demonstrated that there are no other alternatives and that the benefits of the development outweigh the harm resulting from the proposed diversion.*
- iii. Development should where possible, provide improvements to the public rights of way network including more river crossings linked to the current Borough of Bedford Rights of Way Improvement Plan.*
- iv. All new routes should be multiuser routes and dedicated as bridleways with a minimum width of 4 metres.*
- v. All new rights of way and gates must be designed to be in compliance with the Disability Discrimination Act or relevant act as amended.*
- vi. Incorporate new routes to extend the existing public rights of way network which are not fragmented by roads, railways and other infrastructure.*
- vii. Ensure that all developments are designed to enable safe crossing of roads, railways and other infrastructure from new and existing public rights of way*
- viii. Public rights of way should retain their existing surface or an improved surface suitable for all users of the rights of way.*
- ix. There should be no net loss of public rights of way as a result of any particular development.*

New permissive paths are encouraged as they can help to fill in gaps in the public rights of way network.

The lack of provision to accommodate horses in the proposals fails to meet this fundamental requirement of the Bedford Borough Local Plan 2030. The scheme should be revised in order for these proposals to comply with the above policy.

3. Design Manual for Roads & Bridges; policy CC 142 section 4 states:

4. Walking, cycling and horse-riding assessment

General

4.1 The assessment shall be applied to large and small highway schemes.

4.2 The assessment shall be completed during the options or concept stage of a highway scheme where this exists.

4.3 Where an options or concept stage does not exist, the assessment shall be completed before the end of the preliminary design stage.

4.4 The output of the assessment shall comprise an assessment report.

NOTE an assessment report template can be found in Appendix B.

4.5 Opportunities for new or improved facilities for walking, cycling and horse-riding users shall be identified at the assessment phase and recorded within the assessment report.

NOTE 1 Identified opportunities for improvement of walking, cycling and horse-riding facilities do not always need to be restricted to the highway scheme extents.

NOTE 2 in some cases, improvements to facilities outside the limits of the highway scheme can result in greater improvements for users than an attempt to incorporate dedicated facilities within the highway scheme extents.

Walking, cycling and horse-riding assessment report – information WCHAR study area

4.6 The Lead Assessor shall define a WCHAR study area on a scheme-by-scheme basis.

4.6.1 The WCHAR study area should typically extend 1km surrounding a small highway scheme and 5km surrounding a large highway scheme.

Report information summary

4.7 The minimum information to be included in assessment reports shall be in accordance with Table 4.7.

RPC request sight of the 'assessment reports' mentioned above.

The lack of provision to accommodate horses in the proposals fails to meet this fundamental requirement of the DMRB GG 142. The scheme should be revised in order for these proposals to comply with the above policy.

RPC are aware that a number of parishioners have requested copies of HE risk assessments associated with the design of the new Roxton Road bridge and roundabout opposite Roxton Garden Centre. RPC are aware that HE have advised these parishioners that no specific risk assessment has been undertaken. RPC believe that this is a significant failure of duty by HE and ask that a specific risk assessment be undertaken and a copy provided to RPC and parishioners as soon as possible.

Overall the failure to comply with the NPPF 2019, the Bedford Borough Council Local Plan 2030 and the DMRB is of the utmost concern and requires immediate address by HE.

RPC comments on the Supplementary Consultation June 2020 documents:

Document title: Supplementary consultation booklet 2020

Page 12;

- States “Enhanced routes for walkers, cyclists, and horse riders that maintain links with the existing public rights of way.” The proposed plans do not accommodate horse riders as claimed in relation to the new Roxton Road Bridge and roundabout.
- During the online presentation held on the 26th June 2020, HE advised that no provision has been made on the Roxton Road Bridge or roundabout as it is not a designated bridleway.
- This fact fails to recognise that horse riders do use the existing bridge and that this risk of death or injury will significantly increase as the new Roxton Road Bridge will be the primary HGV route in and out of Wyboston.
- RPC are aware that HE have been contacted by many residents of Roxton, Wyboston, Chawston and Colesden about this fact. The number of horse owners in the area demonstrates the demand and therefore demonstrates that the risk is real and needs mitigating.

Pages 18 to 28; summary of proposed changes since June 2019;

- **Proposed change 1:**
- With respect to the storage of construction materials under this change RPC insist that as part of any construction method statement that the hours of operation be limited to 7:00 am to 7:00pm Monday to Friday, 7:00 am to 1:00pm on Saturdays & Sundays and exclude bank holidays.
- RPC also insist that vehicle reversing alarms are not utilised on Sundays.
- RPC insist that the land affected by this change be returned to its existing condition upon completion of the works or that the land be planted to provide additional woodland habitat.
- **Proposed change 2:**
- While RPC welcome the proposals to provide noise bunds the height of these bunds are insufficient to prevent noise pollution from the A421 causing harm to parishioners.
- RPC ask HE provide copies of the existing noise level surveys and evidence as to how much these bunds will reduce noise levels.
- RPC also comment that these noise measures should extend further west as far as the bridge to High Barns.
- RPC wish to let it be known that they would consider acoustic fencing along the southern edge of the A421 from Black Cat to the High Barns Bridge if this would maximise the reduction in noise pollution.
- RPC have on many occasions pointed out that the existing noise levels from the A421 are unacceptable and therefore the maximum reduction in noise pollution is of upmost importance to parishioners.
- In the event that bunds are demonstrated to be most effective means of maximising the reduction in noise pollution RPC insist that these bunds have an acoustic barrier (circa 1m) added at the crest of the bund and that the bunds be planted with semi mature native species trees to ensure a net gain in biodiversity for the area.
- Finally it is noted there are no noise bunds or fences proposed along the southern section of the A421 between the new Roxton Road Bridge and the Black Cat; this stretch of road should also be provided with acoustic barriers.
- **Proposed change 3:**
- This reduction in land take is welcomed.
- **Proposed change 4:**
- Please confirm the duration of the closure of the public right of way (ROW 10)?

- **Proposed change 5:**
- This change is welcomed.
- RPC refer HE to previous comments with respect to the height of the parapets and the recommendation outlined by the British Horse Society recommendations as well as their obligations under the NPPF, Bedford Borough Local Plan 2030 and the DMRB.
- RPC direct HE to the submission by BHS (see appendix B) for further details on the subject of
- RPC request solid barriers be fitted to reduce the extent of light pollution from vehicle headlights.
- RPC request that the T-junction opposite Roxton Garden Centre be a signalised controlled junction. Historically there have been many accidents at the existing junction resulting in one fatality.
- **Proposed change 6:**
- The reduced roundabout size is welcomed.
- **Proposed change 7:**
- The addition of flood storage is welcomed.
- **Proposed change 8:**
- In principal this changed is welcomed.
- However RPC are concerned that there are no measures to prevent light pollution from vehicle headlights particularly on the raised section of Kelpie access track.
- RPC note that the new footpath & cycle way does not accommodate horse riders as it should under the NPPF, Bedford Borough Council Local Plan 2030 and the DMRB.
- RPC insist that this new ROW should connect with the existing footpath (ROW 4) just south of the existing School Lane exit onto the A1.
- RPC insist that any gates from School Lane onto the new footpath be of suitable design to be accessible to all road users including DDA and BHS standards.
- RPC repeat their request that the closing of the School Lane exit onto the A1 be undertaken as early as possible during construction in order to prevent 'rat running' through the village.
- RPC insist that School Lane be downgraded to 30mph for its full length.
- RPC ask HE to advise why a new turning head has been provided off School Lane after the last property along School Lane as shown on 'updated general arrangement plan sheet 1 of 16 revision P03'?
- RPC insist that the C44 from the Black Cat towards Roxton pass the junction with High Barns be downgraded to a 40mph speed limit.
- RPC insist that a new stretch of footpath be provided on the southern side of the C44 linking the Kelpie path to the existing path that currently terminates at Roxton Garden Centre.
- RPC request that all access points off the new Kelpie track be provided with suitable measures (gates or earth bunds) to be prevent illegal incursion such as Gypsy and Travellers
- RPC repeat their request that the land between the Kelpie track and the A1 northbound exit slip be planted to create a new woodland habitat.
- **Proposed change 9:**
- The realignment of this section of the new road is welcomed.
- **Proposed change 10 onwards:**
- RPC have no further comments to make on the summary of changes since June 2019.

Document title: Supplementary consultation 2020 Map book 1 – Updated General Arrangement

Using the reference numbers of the changes to sheet 1 of 16 RPC have the following comments

Change ref 1001;

- See previous comments.
- In order to minimise light pollution and the impact on foraging roots RPC request that the street lighting be omitted from this roundabout and its 3 approaching roads.

Change ref 1002;

- See previous comments.
- In addition to the above previous comments RPC insist that the gap in the bund to accommodate Rockham Brook be closed with an acoustic fence.

Change ref 1003;

- See previous comments.
- In addition to the above previous comments RPC would draw HE attention to the Wyboston & Roxton Bridleways Group available on Facebook. With nearly 120 member collectively this group own over 200 horse living within a 2mile radius of Black Cat.
- RPC would also draw attention to the submission from the British Horse Society (see appendix B).

Change ref 1004;

- Please confirm how many trees will be lost due to the realignment of this section of Roxton Road.
- Please provide replacement trees of comparable quality to mitigate against this loss.

Change ref 1005;

- See previous comments.

Change ref 1006;

- See previous comments.
- In order to minimise light pollution and the impact on foraging roots RPC request that the street lighting be omitted from C44 between Black Cat and the new Kelpie access.

Change ref 1007;

- See previous comments.

Change ref 1008;

- No comment on this change.

Change ref 1010;

- No comment on this change.

Change ref 1011;

- See previous comments.

Change ref 1012 to 1061;

- No comment on these changes.

Additional Comments on Map book 1 – sheet 1 of 16:

- The triangle of land between A421 & C44 after the Roxton Road Bridge towards Black Cat and the wedge of land between the new Kelpie access and A1 northbound exist slip road should be all planted as new woodland habitat. This cost effective measure would greatly enhance the net gain biodiversity of the development, it would significantly reduce the noise and light pollution upon parishioners while enhancing the sustainable credentials of the development.
- The existing footpath along the western side of the A1 approach to the Black Cat should be retained and follow the new northbound exit slip road.
- In order to minimise light pollution please omit the street lighting on the northbound exit slip road and the westbound access slip onto the A421.
- Provision should be made to facility walking, cycling & horse rider access to the future nature reserve that is to be created upon completion the gravel extraction works in the immediate vicinity of Black Cat.

General comments:

- RPC request quarterly meetings with representatives from the construction team throughout the duration of construction. In due course RPC request that a community representative from the construction team and/or the HE team be identified to liaise with RPC and parishioners to manage day to day issues throughout the construction period and for 24months after completion.
- Can HE please confirm the extent of CCTV to be provided as part of the completed scheme?
- Can HE please provide details of the compensation scheme available to parishioner effected by the development from noise, air and light pollution?
- Can HE please provide a copy of their risk assessments associated with the proposals around Black Cat, the new Roxton Road Bridge & roundabout and the new Kelpie access track?
- Can HE please provide a copy of the Construction Method Strategy and/or Plan?

Appendix A: Copy of RPC comments to the consultation documents in June/July 2019

As of 26.07.20 most of the matters raised below remain unanswered and therefore RPC insist that HE respond to the below?

A428 Black Cat to Caxton Gibbet

Roxton Parish Council (RPC) response to Highways England's (HE) consultation June/July 2019

Dated: 19.07.19

Document: Consultation Brochure

Page 37; Diagram A:

- The proposed new route referenced no. 1 from the bottom of School Lane, Roxton around Roxton Garden Centre and over the new bridge towards Chawston should be constructed so that it is suitable for all vulnerable road users.
- The railings to the new bridge opposite Roxton Garden Centre towards Chawston should meet the British Horse Society recommended height for such situations.
- All new footpaths/cycle ways and bridleways should be at least 4m wide in line with current regulations/guidance.

Document: Non-Technical Summary

Page 4; Scheme Objectives:

- It is noted that one of the primary objectives is to “maintain existing levels of biodiversity and have a beneficial impact on air quality and noise levels in the surrounding area.” Can Highways England (HE) please demonstrate to Roxton Parish Council (RPC) what physical features of the current proposals achieve each of these objectives within the Roxton area?
- It is noted that one of the primary objectives is to “ensure the safety of cyclists, walkers and horse riders and those who use public transport by improving the routes and connections between communities”. Can HE please demonstrate to RPC what physical features of the current proposals achieve each of these objectives within the Roxton, Wyboston, Chawston and Colesden areas?

Page 8; Air Quality:

- With respect to construction traffic and emissions of nitrogen dioxide; RPC request that HE commit their chosen contractor and their sub-contractors to ensure that all construction traffic should use A421, A428 and A1 and not the C44 or roads through Roxton, Wyboston, Chawston, Colesden, Great Barford or Blunham to access the construction area.
- With respect to operations; in due course RPC request sight of the computer modelling.

Page 10; Landscape:

- With respect to construction; can HE please advise RPC what temporary measures will be undertaken to maintain existing public rights of way (ROW) during construction.
- With respect to operation; can HE please demonstrate whether vehicle headlights on the new black cat junction will be visible to properties in Roxton, and if so which areas within Roxton are likely to experience this? Assuming that vehicle headlights will be visible can HE please confirm that physical features such as tree lines or solid fence will be added to the scheme?
- With respect to operation; can HE please advise RPC what the significant adverse effects that their preliminary assessment has identified will be on the locality of the black cat roundabout? In turn can HE please advise what features of the current proposals have been added to mitigate against these significant adverse effects?
- With respect to operation and figure A; RPC request that the more woodland planting be added to the scheme, specifically on both sides along the full length of the new access track to/from Kelpie Marina. RPC request that the area of land between this new track and the realigned northbound carriageway of the A1 be fully planted with the new woodland planting. RPC request that significantly more woodland planting be added along the stretch of land south of west bound carriageway of the A421 from the black cat as far as application redline boundary. RPC request that significantly more woodland planting be added along the stretch of land south of east bound carriageway of the A428 from the black cat as far as the new Little Barford bridge crossing.
- With respect to operation; RPC do not consider that it is acceptable for the new planting to only reduce the impact of 'some of the adverse effects', instead RPC request that measures are incorporated within the scheme to reduce the impact of 'all of the adverse effects'.

Page 15; Noise and Vibration:

- With respect to Operation: RPC request confirmation from HE of the baseline dB figures that the proposed scheme will be measured against. RPC request confirmation from HE of what physically features are proposed to mitigate against effects of noise on Roxton?

Page 16; Population and Health:

- With respect to construction; can HE please advise RPC what temporary measures will be undertaken to maintain existing public rights of way (ROW) during construction.

Page 18; Climate:

- With respect to Operation; RPC suggest that significantly more woodland planting and wild flower meadow planting should be added to the scheme to offset the effects of increased traffic use of the implemented scheme.

Document PEI Report Volume 1

Page 81; para 7.4.3:

- RPC request that lighting along the flyover section of the A428 be omitted from the scheme in order to ensure that existing light pollution levels are not increased as a result of the scheme.
- RPC request that consideration is given to ensure that existing light pollution levels are not increased as a result street lighting on all other sections of the scheme.

Page 85; para 7.6.14:

- Please provide copies of the photomontages relevant to Roxton of the scheme at the year of opening and fifteen years post opening?

Page 122; para 11.2.3:

- RPC request that the noise receptor locations continue to be monitored through the construction phase and post opening. The length of post opening monitoring period to be for 5 years, thereafter bi-annual measurements (summer & winter) should be taken for years 6 to 15 post opening. The purpose of this request is to ensure that noise mitigation measures achieve the objective of mitigating against noise pollution in Roxton.

Page 125; para 11.3.8:

- RPC request that the extent of NIA be extended to include eastern side of the village (i.e. the properties whose rear gardens face towards the black cat junction).

Page 126; para 11.5.3:

- RPC's preferred solution for noise pollution and vehicle headlights is for solid acoustic screening combined with woodland planting. The woodland planting will help screen the visual impact of the scheme while providing a sustainable source of carbon capture.

Page 127; para 11.5.11:

- Please provide a copy of the preliminary indication of which properties may qualify for insulation under the Noise Regulation.

Page 128; para 11.6.6; point d.:

- Please provide details of the increase in noise levels and what receptors could experience this increase?

Page 130; para 12.2.2:

- With respect to the surveys of use by WCH's, RPC request that HE acknowledge that the results of existing surveys of use will not reflect the aspiration of such users. This proposed scheme is an opportunity to encourage more sustainable uses of the public highway by increasing connectivity of the wider network between surrounding settlements.

Page 136; para 12.4.6:

- With respect to construction; RPC request that measures are taken to ensure the safety of WCH users within the application redline but also that HE support RPC in their efforts to secure similar measures are taken along the C44 which is believed to be under the jurisdiction of Bedford Borough Council.

Document PIER Volume 2 Fig 11.1 Noise Location Plan

- The important noise area indicated on this plan should be extended to include the eastern side of the village and not just the area of land around the junction of the C44 and Park Road, Roxton.

- There appears to be an error on the plan receptor no. 11 located on Park Road, Roxton is listed in the accompanying key as being St Neots Autograss Club rather than 'Park Road, Roxton'.

Other General Comments from RPC:

- RPC request that the closing up of School Lane Roxton is undertaken at the early stages of the construction?
- RPC request that temporary signs be erected on the C44 advising motorist that there is no access to the A1 via Roxton?
- Can HE please confirm that the existing 'Black Cat' silhouette feature will be retained and also advise where it will be located on the finished scheme?
- RPC believe that the proposed works create an opportunity that is has yet to be grasped namely that overall the proposed soft landscaping appears to be of minimal value; RPC strongly recommend that the extent of such landscaping be significantly increased to create an exemplar scheme of the highest environmental standing that significantly adds to the biodiversity of the surrounding area through more woodland planting and the creation of wild flower meadow verges.
- Can HE please confirm what percentage of Electric Vehicles they have assumed would be in use in their modelling predictions on Noise and Air Pollution?
- RPC request that the length of the two lanes exit from the C44 onto the new black cat junction be lengthened to allow queue of at least four vehicles?
- Can HE please confirm the extent of new signs, gantries etc. in and around the black cat junction and the new bridge opposite Roxton Garden Centre?
- Can HE please confirm that the existing public transport routes (X5) will be protected throughout construction and post opening?

Appendix B: Copy of BHS comments to the supplementary consultation documents in June 2020.

I would like to make the following comments on the A428 Black Cat to Caxton Gibbet scheme on behalf of The British Horse Society in Bedfordshire. My fellow volunteer in Cambridgeshire, Lynda Warth, has already submitted comments regarding the above project on behalf of the BHS in Cambridgeshire. (ID: ANON-XEK5-CZ9Z-D).

Mrs Warth's response sets out the many reasons why safe access must be available to all vulnerable road users, cyclists, pedestrians and horse riders. These considerations apply equally in Bedfordshire and for the sake of brevity I will not repeat them here.

I would however point out that Bedford Borough recognised that necessity to provide safe access to all within its Local Plan 2030 by stating at Policy 91 iv) that "All new routes should be multiuser routes and dedicated as bridleways with a minimum width of 4 metres"

There is currently a noted lack of off road routes for equestrian use in the vicinity of Wyboston, Chawston and Roxton. There is a significant number of horse riders in this area who would very much like to see the opportunity being taken to improve equestrian access as part of this project. As a measure of the extent of demand, it is worth noting that a Facebook group recently established to engage equestrians with this project already has [117] members. I believe that many of them have submitted their own responses to your consultation.

I am also aware that you are committed to engaging with key stakeholders (such as the BHS and the local parish councils) so I trust that you will give full consideration to our requests which are:

1. The bridge over the A428, Roxton Road, should be designed to equestrian standards, with horses separated from the increased levels of HGVs (this will be achieved if 2. below is accepted and the parapet on that side of the bridge is to the required height and design).
2. The 'shared footway/cycle paths' shown in red on maps 1 and 2 of the Updated General Arrangement Plans should be upgraded to bridleway status
3. The provision of a parallel public bridleway running the length of the new A428 (as proposed by Swavesey Bridleways Association and strongly supported by the BHS) should include an underpass of the A1 so that this new bridleway is accessible by horse riders from the Bedfordshire villages.
4. A bridleway link is made from Wyboston to the current underpass under the A1 and through to Alpha Drive, St Neots. This could either be by creating a route further north from the route on Map 2 (although it would appear that this may be difficult to achieve) or by getting Footpath 37/A9 upgraded from the end of Northfield Road, Wyboston, through to Alpha Drive.
5. The gantry to be built by Bridleway 6 to the west of Black Cat is designed in such a way as to not impede or endanger use of that bridleway (plan 16E)
6. Speed limits should be imposed on the country lanes that may be used by diverted traffic during construction.

To expand on these requests:

1. As noted, if point 2 below is accepted then the separation of horses from the increased HGV traffic over the bridge will be achieved. The bridge will need to be designed to equestrian standards, in particular that it will need appropriate height parapets alongside the bridleway.

The current bridge is considered unsafe by riders due to its lack of parapets and the lack of separation from the traffic. In particular, it cannot be used by young/inexperienced horses or children, of which there are a number in Wyboston.

I understand that there may have been a perceived lack of need to provide equestrian height parapets, as horse usage of the current bridge is not regarded as significant. This is flawed thinking – there are many riders, who would use the bridge if they considered it safe for themselves and their horses. To use an analogy, if people do not try to swim across a raging river because it would lead to near certain death, that is not evidence that a bridge is not needed.

Due to the closure of other HGV routes into Wyboston from the A1 Northbound, all HGV traffic will be diverted along a new route of a single road, bridge and roundabout. This will significantly increase risk of accidents and death amongst all road users. However riders are particularly vulnerable road users and Rule 55 of the Highway Code states riders should avoid roundabouts wherever possible. Appropriate bridge parapets and an alternative roundabout route are vital to mitigate risk.

2. The use of the new footpath/cycleway would allow riders to create safe routes on this path and on quieter side roads:
 - A circuit of about 10 miles could be created using the new route to the connection with the Lane in Chawston and then to Colesden to pick up the bridleway that leads back to the bridleway bridge at 16E and return via Roxton High Street and School Lane. A 10 mile hack takes about 2 hours and would be considered an appropriate distance by experienced riders to maintain fitness and wellbeing of both horse and rider.
 - There would be a very short circuit available within Roxton, using School Lane, the new route, part of Bedford Road and the High Street. At less than 2 miles this would be useful for a quick daily exercise route.
 - There would also be a 'lollipop' ride from Wyboston and Chawston down to join this circuit and back – another good daily exercise route.

The BHS can see no reason why this request should be refused – it will provide significant benefit to local riders for minimal additional cost and it is in line with Bedford Borough's policy that new routes should have bridleway status.

3. As set out in Mrs Warth's submission, the A428 plans give the opportunity for strategic, long-term advantageous benefit in non-motorised user inclusion, at very little extra cost. The non-motorised users based in Bedfordshire should be included within that opportunity.

Your consultation states that the existing A428 between St Neots and Caxton Gibbet will be retained for use by various users, including horse riders. This is somewhat disingenuous so far as horse riders living on the west side of the A1 are concerned since they cannot access the existing A428 and in any case the section of the A428

within Bedfordshire is not currently suitable for horse use, given the low parapets across the river and wetlands.

It is therefore important that a connection to the new A428 parallel bridleway is provided - this is likely to require an underpass of the A1 close to the Black Cat roundabout.

4. BHS Bedfordshire would propose that, as part of this scheme, a bridleway link is made from Wyboston to the current underpass under the A1 north of Wyboston and through to Alpha Drive, St Neots. This could either be by creating a bridleway route heading north from the new route on Map 2 (although it would appear that this may be difficult to achieve) or by getting Footpath 37/A9 upgraded from the end of Northfield Road, Wyboston, through to Alpha Drive.

This will preserve the potential for an Active Travel route to St Neots and beyond to Winteringham and a wider network – not only for horse riders but also for cyclists who at present are excluded from this Footpath route.

The BHS does not represent cyclists but notes that the provision of a bridleway connection through this underpass of the A1 to Alpha Drive would provide a safe off road cycle route to the many retail and food business located just the other side of the A1 (Lidl, Aldi, B&Q, BM, KFC, Costa etc etc). The future potential for enhanced equestrian use can perhaps be seen as an add-on at this stage but the benefits for Wyboston etc residents willing to undertake Active Travel to these destinations would be immediate.

5. The gantry to be built alongside Bridleway 6 must be designed to ensure that it does not present a hazard to the legitimate users of the bridleway. The obstruction of the route by the supports for the gantry must be avoided and the height clearance, should the gantry overhang the bridleway, must be a minimum of 3.5m and ideally more.

The bridleway runs alongside the road for only a short section and it would in fact be preferable if the gantry could be relocated a few yards to a position that does not interfere with the bridleway but we appreciate that there will be a number of safety factors involved in the positioning of the sign.

6. Recent roadworks on the A428 created exceptional difficulty for local riders as traffic that was diverted from the A428 onto Colesden Lane and Chawston Lane drove at very high speed (no doubt because they had been delayed in their journey). To the extent that diversions are set up as a result of the work required for this project, the BHS asks that a 30mph speed limit be imposed on any country lanes affected.

Your consultation document states that you have provided “Enhanced routes for walkers, cyclists, and horse riders that maintain links with the existing public rights of way.” This is not the case in the Roxton/Wyboston area so far as equestrians are concerned in that the new bridge will be even more dangerous than the current one, with higher levels of HGV usage and equestrians expected to use the road rather than the new ‘shared footway/cycle path.’

If our requests are accepted, your claim would be delivered.

As ever, the BHS is happy to engage in further discussions of all the issues raised.

Ann Kennedy

County Access & Bridleways Officer – Bedfordshire
East of England Chair
The British Horse Society