

Patron His Majesty The King

Bringing Horses
and People Together

The British Horse Society

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The logo for The British Horse Society, featuring the text "The British Horse Society" in white on a red square background.

Rother Local Plan

Via email draftlocalplan@rother.gov.uk

2nd July 2024

Dear Planning Team

RE: Draft Local Plan 2020-2040 - Regulation 18 Consultation

The BHS is the UK's largest equestrian charity with 124,000 members and represents the country's 3 million horse riders. One of our charitable objectives is *"to promote and secure the provision, protection and preservation of rights of way and of access for ridden and driven horses over public roads, highways, footpaths, bridleways, carriageways, public paths and other land."*

We are keen to see the Local Plan including equestrians within its pages to ensure their needs are protected and enhanced along with other users of PROW and greenspace.

Key information

Economic Contribution

- **Almost 4000ⁱ passported horses** are owned by people living in the Rother District area, contributing over **£27 millionⁱⁱ** to the economy, much of which is spent locally (feed, bedding, farriers, vets, riding instructors and riding schools, etc.)

Greenspace and PROW

- Horse riders have the right to access just **22% of the public rights of way network**, with substantially less for carriage drivers. Many of these routes are inaccessible or disconnected as a result of increased traffic and/or development.

Health and Wellbeing

Research undertaken by the University of Brighton and Plumpton College on behalf of The British Horse Societyⁱⁱⁱ found that

- More than two thirds (68%) of respondents participated in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimates that **such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity.**
- A range of evidence indicates the vast majority (90% plus) of horse riders are female and more than a third (37%) of the female riders of respondents were above 45 years of age. **Horse riding is especially well placed to play a valuable role in initiatives to encourage increased physical activity amongst women of all ages.**
- Amongst the horse riders who took part in the survey, **39% had taken no other form of physical activity in the last four weeks.** This highlights the importance of riding to these people, who might otherwise be sedentary.

Horse riders with a long-standing illness or disability who took part in the survey are **able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability.**

Road Safety

The British Horse Society is an Appointed Representative of SEIB Limited who are authorised and regulated by the Financial Conduct Authority.

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Road Safety is a particular concern to equestrians, who are among the most vulnerable road users (VRUs). 2023 data shows

- 3,383^{iv} road incidents involving horses were reported to The British Horse Society;
- 66 horses have died and 86 have been injured;
- 3 people have died and 94 have been injured because of road incidents;
- 85% of incidents occurred because a vehicle passed by too closely or too quickly.
- In 2021 alone, **3,288 horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents**. (NHS Hospital Episodes Statistics). These figures demonstrate how important it is that planning authorities, developers, Highways and Strategic Transport understand the requirement for safe access for equestrians both on the roads and the links to the Public Rights of Way (PROW) Network.

Equality Act 2010

The arguments for inclusivity of walkers and cyclists can be extended to equestrians using the mechanism of the Equality Duty. To exclude equestrians from provision for other VRUs is a **form of discrimination**, and the Equality Act 2010 created a Public Sector Equality Duty for organisations to provide equal opportunities for all, which means that an organisation **needs a cogent reason for excluding equestrians**. The majority of off-road routes can and should accommodate all non-motorised VRUs – pedestrians, cyclists and equestrians. None of these users should be excluded and forced onto carriageways with the increased danger that entails.

The majority of off-road routes could and should accommodate all non-motorised VRUs— equestrians, cyclists, pedestrians and mobility buggy users—and therefore be truly (non-mechanically propelled) multi-user routes (Multi-user has no legal definition and is often confused in its meaning but generally means all users, not only pedestrians.) The BHS considers it to mean all non-motorised users.

Planning Policy, etc.

National Planning Policy Framework

Para 96. *Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which:[...]*

(c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

Para 97. *To provide the social, **recreational** and cultural facilities and services the community needs, planning policies and decisions should: [...]*

(b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;

Para 102. *Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on **robust and up-to-date assessments of the need for open space, sport and recreation facilities** (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.*

Para 104. *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.*

LTN120 Cycle Infrastructure Design

“Walking, Cycling and Horse Riding Assessment and Review

*4.5.10 DMRB also contains guidance on undertaking a Walking, Cycling & Horse-Riding Assessment and Review (WCHAR).¹⁹ Although this is applicable to trunk roads, it provides a good basis for assessing the needs of **all users** along and across interurban roads” (my emphasis)*

Sustrans Paths for Everyone

*"We want to see a UK-wide network of traffic-free paths for **everyone**, connecting cities, towns and countryside, loved by the communities they serve."*

Highway Code Rule 215

Along with information on how to pass horse riders and carriage drivers safely, the Code reminds road users that, *"Horse riders are often children, so take extra care and remember riders may ride in double file when escorting a young or inexperienced horse or rider."* At the present time in too many areas we have the situation where a young child on their pony is afforded less protection than an older child or adult on their bike.

East Sussex County Council Right of Way Improvement Plan (ROWIP)

In its (now out of date but currently not superseded) ROWIP, ESCC included the following information:

Objective 3b, *"Make roadside verges safer for horse riders and other users"*

Objective 4.b. *"Improve and promote a series of routes designed for disabled people."* (NB 5.3.12, *"Both bridleways and byways offer a **greater** potential for use by people with restricted mobility than most footpaths."*)

5.3.12 *"Both bridleways and byways offer a greater potential for use by people with restricted mobility than most footpaths. See 5.6 below."*

5.4.1 *"...The legal right for cyclists to use bridleways means that improvements to the bridleway network will assist cyclists as well as horse riders and walkers."*

7.4.3 *"The other quick win has been part of a long-term project to secure a safe route for walkers, horse riders, cyclists and the disabled alongside the B2116 between Ditchling and Offham. This route could potentially link a number of bridleways and footpaths allowing the public to travel safely both alongside the road and across it at various points."*

Comments on specific places within the consultation document taking into account the statistics and policies above:

Plan	BHS Comments
<p>Overall Priority 2 – Live Well Locally</p> <p>2.9 <i>Live Well Locally promotes the idea that residents of all ages, abilities and backgrounds should be able to access their daily needs (housing, work, food, health, education and culture and leisure) as locally as possible and have the option to do this by walking, wheeling, cycling or by public transport.</i></p> <p>2.10 <i>Creating connected communities can enable people to Live Well Locally and improve health and wellbeing through better air quality, more physical activity, greater nature connection and social interaction.</i></p>	<p>Walking, wheeling & cycling routes should be truly inclusive multi user routes. Leisure use extends the value of routes provided primarily for commuting and school journeys. Where away from the roadside, new routes should be created at bridleway or restricted byway status. These provide the best benefit to tax payers as they include more users, thus providing more health and wellbeing benefits as well as providing more opportunity for those with a disability to enjoy the routes on horseback or (on byways) in a carriage.</p>
<p>4.1 <i>The 'Live Well Locally' concept as an overall priority of the Local Plan underscores Rother's dedication to cultivating healthy, sustainable, and inclusive communities that support residents across the age spectrum. Live Well Locally aims to create an environment where individuals of all ages can live, work, and play with dignity and independence. Rother seeks to foster a dynamic and vibrant community that values diversity and intergenerational connections.</i></p>	<p>As above</p>

<p>4.2 This overall priority envisions a network of mixed-use and adaptable places which promote happiness, health and wellbeing, foster social interaction, reduce health inequalities, encourage active living, and enhance overall quality of life. They will be resilient to the effects of climate change while respecting the unique context and character of our district.</p> <p>4.3 The approach is to create inclusive 'connected and compact neighbourhoods' in our towns, and 'village clusters' in our rural locations, with inspiring public spaces where people can meet most of their daily needs within a reasonable distance of their home, preferably by walking, wheeling, cycling (active travel), or using public transport options.</p>	
<p>Proposed Policy LWL3: Walking, Wheeling, Cycling and Public Transport (Outside the Site)</p> <p><u>(A) All major development proposals for new dwellings must meet the following criteria:</u></p> <p>ii) Active Travel Infrastructure. Provide or financially contribute to the delivery of walking, wheeling and cycling (active travel) infrastructure, integrating with any applicable Local Cycling and Walking Infrastructure Plans and the East Sussex Local Transport Plan, evidenced through the submission of a Transport Assessment that:</p> <p>a) Provides a quantitative analysis of the multi-modal trip generation of the development, considering the routing of these trips to inform further considerations about the impacts and quality of existing routes within and outside the development.</p> <p>b) Provides qualitative analysis of the accessibility of the site for all users particularly those most vulnerable e.g. older people, young and disabled and highlight deficiencies and opportunities in surrounding walking, wheeling, and cycling infrastructure through consideration of policy and guidance provided in CIHT 'Planning for Walking' 2015, LTN 1/20[18] and Active Travel England's active travel design tools. Development should consider new guidance and tools, as issued by Active Travel England as they become available.</p> <p>c) Provides detail and justification of proposed improvements to infrastructure and any other supporting strategies which seek to enable an increase in walking, wheeling, and cycling rates for all users particularly the most vulnerable.</p> <p>iii) Coastal Access. Public access to the coast must be retained and improved where possible (e.g., through the creation of new path links). The King Charles III England Coast Path National Trail must be protected and opportunities taken to enhance the route (e.g., re-aligning the trail closer to the sea).</p>	<p>As above. Further, proposed "improvements" to existing infrastructure must be an improvement for <u>every</u> user. For example, tarmacking a bridleway to provide a "cleaner" path to school would result in a less safe and amenable path for other users as it would be more slippery for horse riders and would result in faster movement of bicycles putting slower moving users at risk.</p> <p>Access to the coast should be improved for all wherever possible. Whilst a pleasant provision for walkers, the coastal path currently mostly provides nothing for those on a bike or a horse.</p>
<p><u>B) All development proposals of more than 50 homes must meet the following criteria:</u></p> <p>High-quality Walking and Wheeling Routes. Provide (if they do not already exist) a high-quality walking and wheeling route from the site to:</p>	<p>As above</p> <p>As explained above, off site routes should include all VRUs and those away from the road side should be created as bridleways or restricted byways.</p>

<p>[...] Open green or blue space. [...] Cycle Routes to Key Destinations. Provide off-site routes that consider compliance with LTN 1/20 and Active Travel England's active travel design tools to relevant destinations such as schools, local centres, employment centres, railway stations and the existing cycling network. All new or improved off site routes must be safe for cyclists of all abilities, ages, and mobility needs.</p>	
<p>4.27 The highway authority produces Local Cycling and Walking Infrastructure Plans (see NPPF, paragraph 110d). If there is an existing protected cycle network, new development should connect to it. Alternatively, large new development should begin a new one by building or funding routes to key destinations.</p>	<p>As above</p>
<p>Proposed Policy LWL4: Walking, Wheeling, Cycling & Public Transport (Within the Site)</p>	<p>Connecting beyond the site, filtered permeability, "safe routes accessible to all", junctions, crossings, shared use routes, should all include equestrians</p>

Conclusion

It is clear that including equestrians within the local plan makes good sense on the grounds of national policy, economic benefit, equality, safety and health and wellbeing. We would be very willing to work with the Council and potential developers to ensure this inclusion and to secure these benefits for every vulnerable road user.

Yours faithfully

Sarah Rayfield (Mrs.)
Access Field Officer – London & South East

[Redacted signature block]

ⁱ DEFRA FoI Request April 2021

ⁱⁱ BETA – The National Equestrian Survey 2023

ⁱⁱⁱ <https://www.bhs.org.uk/media/ganngxh/health-benefits-of-riding-in-the-uk-full-report.pdf>

^{iv} It is estimated that currently only around 1 in 10 incidents are reported to the BHS.