

Patron Her Majesty The Queen

The British Horse Society

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Bringing Horses and People Together

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Penny Mills
Planning and Regulatory Services,
West Suffolk Council,
West Suffolk House,
Western Way,
Bury St Edmunds,
Suffolk,
IP33 3YU
Via email

12th March 2021

Dear Sir/Madam,

RE: DC/21/0315/FUL | Planning Application - Specialist dementia care village for up to 120 residents, including: 20 x 6 bedroom apartments provided within five buildings; central amenity building containing shop, restaurant, pub, communal hall, offices and staff accommodation; club/hobby rooms; treatment/counselling rooms; vehicle and cycle parking; landscaping proposals and associated works | Little Court Haverhill Road Little Wratting CB9 7UD

I am responding to this consultation on behalf of The British Horse Society, an equestrian Charity which represents the 3 million horse riders in the UK. The British Horse Society has no objection to this application in principle but believes that the equestrian community have been excluded from these proposals. Nationally equestrians have just 22% of the rights of way network. In Suffolk, they have just 18% of the rights of way network, increasingly disjointed by roads which were once quiet and are now heavily used by traffic resulting from development within the County. It is therefore important that these public rights are protected.

Increasing pressure for development of houses and industry is making even fewer of those bridleways and byways available. Ancient 'green lane' bridleways, byways and unsurfaced roads are being tarmacked as access roads or cycle tracks and engulfed by new development spreading into the countryside. Traffic increases with new development or change of use so roads become even less safe for riders and carriage-drivers (equestrians) to use to access any traffic-free routes there may be. Riders are also increasingly excluded from verges by creation of foot-cycleways – segregated provision for other vulnerable non-motorised users but equestrians are excluded and forced into the carriageway. Historically verges have provided a refuge and could, if mown, provide a segregated route.

Road Safety is a particular concern to equestrians, who are among the most vulnerable road users. Between November 2010 and February 2021, the BHS received reports of **5,784 road incidents**, in which **441 horses and 44 people were killed**. 75% of these incidents occurred because a vehicle passed by too closely to the horse. Research indicates however that only 1 in 10 incidents are being reported to the BHS; in 2016-17 alone, **3,863** horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (NHS Hospital Episodes Statistics).

The BHS actively campaigns to improve road safety by making motorists aware of what to do when they encounter horses on the road (see <https://www.bhs.org.uk/our-work/safety/dead-slow> – we recommend

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taking a few minutes to watch the 'Dead Slow' virtual reality film for an impression of how vulnerable equestrians are in proximity to cars and lorries).

Because of the difficulties that equestrians encounter on roads, they avoid using them wherever possible. Road use is often unavoidable; however it is simply because people have nowhere else to exercise their horses. The main off-road access available to them is the network of Rights of Way (RoW). England and Wales have over 140,000 miles of RoW, but only 22% of this network is available for horse riders (who may only use routes designated as Bridleways and Byways) and a mere 5% to carriage drivers (who only have access to Byways). An additional factor is that the network is fragmented, and roads are often the only available links between one RoW and the next.

The demand for safe access to the countryside for the health and wellbeing of local residents who have been subjected to Covid 19 lockdown restrictions has increased tenfold. It is acknowledged that it is highly likely that the post Covid new 'norm' will see significant changes in the work / home lifestyle balance resulting in increased pressure on the rights of way network. During the pandemic, the value of horses has increased substantially with people spending more time at home looking to find enjoyable ways to exercise, they are able and want to own horses. It is highly likely that the need and demand for improved equestrian access is likely to rise. It is morally, socially, economically and environmentally correct that public money should be spent to benefit the maximum number of users – no matter what label is given to the funding pot therefore where any walking and cycling routes are provided these should be available for equestrians also.

Failure to accommodate the needs of these users would be contrary to National and Local Policies such as:

- **Highways England Accessibility Strategy** states:
'Our vision focuses on supporting our road users' journeys, pedestrians, cyclists, equestrians, those with disabilities (such as users with mobility or sensory impairments) and other vulnerable users – while delivering longer-term benefits for communities and users alike.
We want to address the barriers our roads can sometimes create, help expand people's travel choices, enhance and improve network facilities, and make everyday journeys as easy as possible.
This will be achieved by ensuring our network supports and contributes to accessible, inclusive and integrated journeys which are safe, secure, comfortable and attractive.'
- **NPPF policy 58 Requiring Good design**
Create safe and accessible environments.
- **Paragraphs 73 and 81 of the NPPF** require Local Authorities to plan positively for access to high quality open spaces for sport and recreation which can make important contributions to the health and wellbeing of communities and to plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation.
- **NPPF Section 8**
Promoting healthy communities
Policy 73 access to high quality open spaces for sport and recreation and can make important contribution to the health and wellbeing of communities.
Policy 75 Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users. For example by adding links to existing rights of way networks.
Policy 81 local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation.

- **The Suffolk Rights of Way Improvement Plan** – ‘2.3 Connectivity – 2.3.1 Take a whole highways approach when considering the journeys of vulnerable users.’
- **The British Horse Society's report Making Ways for Horses** – off-road Equestrian Access in England – Equestrian Access Forum August 2012, highlights the importance of horse riding for health and well being. Access for horse riders, which inevitably involves crossing roads, is central to riding activities without which the level of participation is likely to decline which will have a negative impact on the local economy (Making Ways for Horses – off-road Equestrian Access in England – Equestrian Access Forum August 2012).

As highlighted in this applications Travel Plan documents: ‘2.1.4 SCC Travel Plan Guidance highlights the following benefits of a Travel Plan: *Social*: Potential for improved road safety and improving relations with neighbours (e.g. reduction in parking disputes), promoting active travel choices which can improve physical and mental health and productivity, tackling childhood obesity and reducing exposure to and the generation of air pollution, which allows those without a car to travel independently.’

The term ‘Active Travel’ applies to journeys undertaken for a range of purposes, whether to reach a place of work or local amenities, or for recreation. It is also the case that many of the routes that are used to walk or cycle to work or school are the same routes which at other times provide for recreational use.

It is now acknowledged that horse-riding is as much an ‘active travel’ mode as recreational walking or cycling. At the recent Parliamentary Debate on Active Travel in Westminster Hall, Robert Courts MP proposed that “**horse riders...ought to be thought about in the context of active travel as well.**” This was endorsed by Michael Ellis, Minister of State for Transport, who confirmed that “**Active travel includes horse riders and bridle paths – this debate includes them.**”

Equestrians have not been considered in this planning application. The Society would argue that to fail to give proper consideration to their needs is a breach of the Equality Act 2010 and the Equal Opportunities Act 2010, as this failure can be seen to be both sexist and ageist, given that the majority of riders are female (over 90%) and many of them are over 45 (37%)¹. This group is one that is generally more inactive than their male counterparts (for example only 62% of women aged 45-54 meet recommended physical activity levels compared to 70% of men²) and so encouraging activity in this group meets important health objectives.

The British Horse Society supports the proposals to upgrade Little Wratting Public Footpath 5 to Bridleway status for use by pedestrians, cyclist and horse riders. The British Horse Society believes that there is documentary evidence and that this route can be reasonably alleged to subsist at a minimum of bridleway status. This public right should be asserted and not be allowed to be subsumed within this development or anything beyond it.

The secondary pedestrian (cycle) access proposed to the east and north of the site needs to be a multi-user route for non-motorised users including equestrians. The creation of equestrian access in new developments is a great opportunity to create the most inclusive type of safe access to the countryside and links between communities.

Any hedges adjacent to PROW must be planted a minimum of 1 metre from the edge of the path in order to allow for annual growth and cutting and should not be allowed to obstruct the PROW, leaving a suitable useable width according to the definitive statement for the route.

¹ British Horse Society Health Benefits of Horse Riding (research undertaken by University of Brighton and Plumpton College)

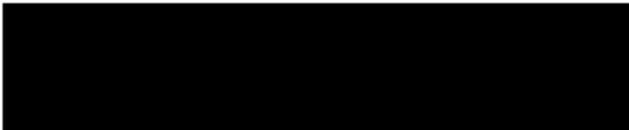
² British Heart Foundation Physical Activity Statistics

Horse riding is a year-round activity which (along with associated activities such as mucking out and pasture maintenance) expends sufficient energy to be classed as moderate intensity exercise. The majority of those who ride regularly are women, and a significant proportion of riders are over 45. For some older or disabled people, being on horseback or in a horse-drawn carriage gives them access to the countryside and a freedom of movement that they would not otherwise be able to achieve. Most riders and carriage-drivers wish to take their horses out on bridleways and byways, away from motor traffic, for the physical and mental health benefits to animal and human, in exactly the same way as most walkers (with and without dogs) and cyclists. Many are unable to do so because the traffic on tarmac roads is too dangerous for such vulnerable road users, and there are generally so few traffic free routes available to equestrians. There are also considerable psychological and social benefits from equestrian activities, as the BHS is demonstrating through the [Changing Lives through Horses](#) initiative.

Equestrianism is a popular activity in this part of Suffolk, and one which contributes significantly to the local economy. The equestrian community in Suffolk currently has many difficulties in finding safe access within the area, as identified in Suffolk's policies. Many of these issues could be addressed and resolved through good planning of future routes. We hope therefore that the applicant will support this, and local equestrians affected by this development, and would be happy to support and facilitate consultation with the local equestrian community.

If you have any questions, or would like to discuss any aspect of this response further, please do not hesitate to contact me.

Yours sincerely



Charlotte Ditchbum (Miss.)
Access Field Officer, East Region