

Patron Her Majesty The Queen

The British Horse Society

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Bringing Horses and People Together

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

Canterbury District Local Plan

Via email consultations@canterbury.gov.uk

19th December 2022

RE: Canterbury District Local Plan consultation

I am responding to this consultation on behalf of The British Horse Society, the UK's largest equestrian charity, representing the country's 3 million horse riders.

The questions contained within the consultation questionnaire do not lend themselves to our response and so we are submitting it in this letter.

Key information

- **3813ⁱ passported horses** are owned by people living in the postcodes contained within Canterbury District Council area, contributing in excess of **£21 millionⁱⁱ** to the economy, much of which is spent locally (feed, bedding, farriers, vets, riding instructors and riding schools, etc.).
- Horse riders have the right to access just **16.7% of the public rights of way network in Kent**, with substantially less for carriage drivers. Many of these routes are inaccessible or disconnected as a result of increased traffic and/or development.
- 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.**
No-one is better qualified to demonstrate this than our new ambassador, six-time Paralympic Gold Medallist and World Champion, Natasha Baker OBE
<https://www.youtube.com/watch?v=pLi-89WWlkc>

Planning Policy, etc.

National Planning Policy Framework

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- Paragraph 98 states that, “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...” Providing for equestrians helps to fulfil this requirement
- Paragraph 100 says, “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 inclusion of equestrians within these enhancements and improved links only improves the value for money of such undertakings.

Kent County Council Right of Way Improvement Plan (ROWIP)

The ROWIP has a significant role in supporting sustainable economic growth in the county, directly contributing to transport, green infrastructure and open spaces; three areas identified in Kent and Medway Growth and Infrastructure Framework as critical to support growth in the period to 2031. Much of this is only achievable through support from local councils in their planning policies.

“The ROWIP will aim to encourage active lifestyles through:[...]

- *working in partnership with planning authorities and developers to create well-designed, accessible environments that encourage active travel and walking, cycling and horse riding as leisure and recreational pursuits.”*

AL01 Increase health & wellbeing benefits

“1.3 Improve connectivity and consider equestrian and other parking where reasonable to encourage recreational and leisure activity; including access to country parks, honey pot sites and other facilities of high leisure use, such as National Trails, promoted routes and routes within and leading to AONBs.”

“1.5 Work with partners to support implementation of health improvement initiatives, such as Walking for Health, cycling and equestrian initiatives and GP referrals.”

AL02 Active Travel

“1.9 Provide motorised traffic free, safe walking, cycling and equestrian and routes linking to towns, urban and rural areas. Seek to provide longer distance links between urban centres.”

KT06 Grow New Markets

“3.17 Improving priority routes which facilitate horse riding, cycling and walking for more targeted tourist leisure and recreational use”

It is evident from a health & well-being viewpoint, as well as an economic one, that the Borough Council should include the needs of equestrians in every aspect of their plan but in particular those aspects involving active travel and health and wellbeing. *Most* walking and cycling journeys are made for leisure purposes and *most* journeys on horse-back or in a horse and carriage are also made for leisure purposes. Active Travel does not mean Active Commuting; it simply means using an active means of getting from A to B. It should not preclude equestrians because few can ride or carriage drive to work or school.

Policy DS12 – Rural Economy	We welcome the inclusion of equestrian considerations
Policy DS24 – Publicly accessible open space and sports	<i>“Opportunities for informal activities close to home or work or enhancement of the appearance of residential or other areas. Routes providing walking, cycling and horse riding, whether for leisure purposes or travel.”</i> We very much welcome the inclusion of horse riding routes but “or” should be replaced with “and”
p34 Site C6	<i>“(vii) Improvements to the PRow network crossing and around the site as required”</i> We welcome this provided that equestrians are provided for within these crossings

Examples of places within the consultation document where horse riders and, indeed, carriage drivers could and should be included are listed below (our comments or emphasis in red):

p10 Sustainable Design Strategy for the District	<p><i>"1.14 The design and layout of new communities must be carefully considered to maximise sustainability, such as by ensuring access to community facilities and services and providing easy and safe opportunities for walking and cycling with appropriate connectivity to the wider network."</i></p> <p>The provision for walking and cycling needs to include equestrians who would also benefit from connectivity with the wider PROW network and quieter lanes.</p>
Policy C5 South West Canterbury	<p><i>The provision of neighbourhoods designed for active and sustainable travel, designed to reduce vehicle speeds, and providing connectivity with the wider cycling and walking network including enhancements to Public Rights of Way;</i></p> <p>This provision needs to include equestrians who would also benefit from connectivity with the wider PROW network and quieter lanes.</p>
p32-34 Site C6	<p><i>"(ii) 11.06ha of new amenity green space (including green corridors) in addition to the retention of the existing amenity space at Lime Kiln Road (0.36ha) and the existing Stuppington Lane Green Corridor;"</i></p> <p>Green corridors need to include horse riders to provide connectivity to the wider PROW network and quieter lanes</p> <p><i>"(e) Retain and enhance elements of historic landscape including field boundaries, hedgerows, footpaths and lanes, and incorporate these where possible and appropriate into the design and layout of the development;"</i></p> <p>This provision needs to include equestrians who would also benefit from connectivity with the wider PROW network and quieter lanes.</p> <p><i>"(k) Conserve or enhance the PROW network across the site ensuring key views from the network are protected and that the walking, cycling and PROW network provides multiple benefits such as being designed as part of ecological corridors"</i></p> <p>Enhancement can be achieved by upgrading the footpath network to at least bridleway status to include horse riders and cyclists</p> <p><i>"(v) New and improved walking and cycling connections to the wider countryside to the south and south-east;"</i></p> <p>This provision needs to include equestrians who would also benefit from connectivity with the wider PROW network and quieter lanes</p> <p>There is an important link for NMUs south and east via Merton Farm - bridleway CB350 turns to a footpath through farm. Development here should require an upgrade to the footpath to bridleway status or higher, together with a suitable link into Mountfield Park from Merton Lane.</p>
p35 Policy C7 – Land to the north of Hollow Lane	<p>Within this site and others adjacent, there is the potential to provide an off road link to connect Hollow Lane to bridleway CB494, south of Cockering Farm.</p>
p39 Policy C8 - Milton Manor House	<p>The opportunity to provide an upgrade to restricted byway (or bridleway) of the footpath CB488 link to byway CB469 should be taken, especially as this is part of a promoted long distance route</p>
p71 Policy C21 - Land at Canterbury Business Park	<p>Bridleway linkages must be retained and enhanced wherever possible</p>
p78 Policy C24 – Land to the south of Sturry Road	<p>Using Sustrans 1, it would be possible to create a circular route round area south of A257 for equestrians, cyclists and walkers.</p>
p86-100 W4/5/6/7/8 South Whitstable	<p>North of A299 There is potential here for a link south to Clowes wood via. Cycle route 1. Following the loss of access to Blean Woods for equestrians, this is key.</p>

policies	Walking and cycling routes need to include equestrian use.
p109 Policy HB4 – Land to the west of Thornden Wood Road	Especially following the loss of access to Blean Woods for equestrians, walking and cycling routes here need to include equestrian use.
p122 Policy R1 – Land at Cooting Farm	This area is very important for equestrians. There are many links to bridleways and byways and one of the current footpaths is subject to a Definitive Map Modification order claim that the path should be recorded as a restricted byway. As a result, any applications would need to consider that these are in progress.
p128 Policy R2 & R3 – Rural service centres	As previously indicated, walking and cycling opportunities need to include a right for equestrian use.
p130 Policy R4 – Land at Mill Field	There is an important opportunity here to create off road link for all vulnerable road users (VRU/NMU) which avoids using Tyler Hill Rd.
p132 – Policy R5 Bridge	Green corridors must align with BHS proposals/aspirations
p157 Sturry (various policies)	Opportunities arising from the proposed link south over railway south to Bridge need to be explored/promoted and include all VRUs.
p176 Policy R24, R25, R26 Broad Oak, Reservoir and Country Park	Arising from these policies, it is imperative that there is a circular route for ALL VRUs (including equestrians) around the reservoir and equestrian links in and out to other routes.
p187 Policy R28 – Countryside	As explained in the key information, access to the countryside is a key aspect to equestrianism and its significant contribution to health and wellbeing. Any proposals to make access to and through the countryside needs to include equestrians
p194 Policy DS4 – Rural housing	Provisions for sustainable transport should also include equestrians unless there is evidence based reason for their exclusion. Further it should be considered that increased use of horses for local work and journeys could even happen in the future. This link to an article in the Guardian (Nov 22)
p203 Policy DS7 – Infrastructure delivery	Making path construction suitable for all modes of non motorised users provides further benefit to the local community.
p212 Policy DS11 & DS12 – Tourism development and Rural economy	Providing good circular routes within and between developments will lead to increased equestrian tourism, creating an increase in business opportunities for livery yards, B&Bs, pubs, etc.
p215 Policy DS13 – Movement hierarchy	This hierarchy needs to include equestrians along with cyclists
p216 Policy DS14 – Active and sustainable travel	<i>“Existing Public Rights of Way should be retained or, where necessary and where the need outweighs the harm, rerouted and upgraded to avoid development providing a publicly accessible, high quality route.”</i> For ALL legitimate users. Where diverted and where onward connectivity might be possible, then existing PROW should be upgraded to at least bridleway status to enable use by walkers, cyclists AND equestrians. This will provide some mitigation for additional traffic on local roads. <i>“Routes and access should be designed to be safe and inclusive and meet the needs of all pedestrians and cyclists, including disabled people and the mobility impaired.”</i> Where there is connectivity to existing higher status PROW and/or lanes used by equestrians, safe and inclusive access for equestrians must also be included.
p217 Policy DS15 –	<i>“Proposals for development that will generate a significant volume of traffic</i>

Highways and parking	<p><i>should be accompanied by a transport statement or assessment and a travel plan. The requirement will be judged on a case by case basis taking into consideration the existing road network capacity and constraints, the anticipated trips generated and the level of parking proposed. These documents must be comprehensive, robust, and demonstrate clearly how the development meets the requirements of the council's movement policies, including how:</i></p> <p><i>(a) The design and layout of the development aligns with the Movement Hierarchy; and</i></p> <p><i>(b) Walking and cycling mode share will be maximised, identifying opportunities for off-site improvements to routes connecting the development to local facilities and public transport networks;"</i></p> <p>These transport assessments must take into account other vulnerable road users impacted by the development, including horse riders and carriage drivers and walking and cycling opportunities provided must incorporate them by way of mitigation.</p>
233 Policy DS24 – Publicly accessible open space and sports	<p>Under Amenity green space and Green Corridors</p> <p>We welcome the inclusion of horse riding but would like the word “or” replaced with “and”</p> <p><i>“(e) Be easily found and accessible walking and cycling, and public transport and road where appropriate, including by those with disabilities, with pedestrian crossings on roads where necessary;”</i></p> <p>AND horse-riding. Crossings on road need to be multi use</p>
p263 Appendix 2 Glossary	<p>Active Travel Journeys that are made by physically active means, including walking, or cycling or horse-riding.</p>
p264 Green Corridors	<p>Green corridors link housing areas to the national cycle network and public rights of way network, town centres, employment areas and community facilities. They help to promote environmentally sustainable forms of transport such as walking and cycling within urban areas as well as providing valuable connectivity for other non motorised users such as horse riders and carriage drivers and can also act as vital linkages for wildlife dispersal between wetlands and the countryside.</p>
Policy T2 (from 2017 Local Plan)	<p>This should be extended in the new local plan to include horse-riding and, where possible, carriage driving</p>

Summary

- The upgrading of existing footpaths to bridleways where onward connectivity is desirable (for equestrians as well as cyclists) to local roads and other bridleways and byways should form part of planning permission granted on these sites.
- Internal “loops”/green space should include equestrians by default.
- “Behind the hedge” paths should be provided next to roads to keep NMU/VRUs off the roads alongside new developments.
- Developer contributions should be sought to provide local equestrian light controlled crossings (for the benefit of all NMU/VRUs) where required or where likely to be required in the future with further development thus improving and/or maintaining connectivity.
- Bridleways and restricted byways must NOT be used as access roads
- The aspirations of KCC’s ROWIP should be borne in mind in all applications. It is obvious in larger proposed developments but even quite small sites might provide key locations for improvement.

As always, we would be very willing to work with the Council and would be developers in providing these improvements for EVERY vulnerable road user.

Yours faithfully

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

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ⁱ DEFRA FoI Request April 2021

ⁱⁱ BETA – The National Equestrian Survey 2019

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