

Rugby Borough Local Plan Consultation May 2025

19 May 2025

Dear RBC Local Plan Team

This response is submitted for and on behalf of the British Horse Society (BHS); local representatives may also submit responses.

The British Horse Society is the UK's largest equestrian Charity, representing the UK's 3.2 million equestrians.

BHS requests that Rugby BC considers the preferred options with the following information in mind.

BHS received 50 road incident reports from equestrians in 2024 in Warwickshire which does not include reports made directly to the police and Warwickshire Road Safety Partnership. A serious road incident not only causes distress to those involved but costs the public purse £2.7M (DfT, 2024) therefore safe off-road access and improved road safety are fundamental in any new development.

Public Rights of Way in the borough provide off-road access for vulnerable road users (walkers, wheelers, equestrians). In Warwickshire as a whole, horse riders (and cyclists) only have access to around 17.7% of the public rights of way (bridleways and byways) and carriage drivers even less at 0.4% (both figures below the national averages). Other routes such as the National Cycle Network can but do not always include horse riders. The Preferred options document reinforces this disparity: Cycling is mentioned 40 times, walking/pedestrians 50 times and horseriding/equestrian activity once. The RoWIP (2011-26) commits to seeking 'improvements, both within a development site and in the surrounding area, where the

development is likely to lead to an increase in use of the local network or where the development impacts on the existing network'; routes for tourism, health, wellbeing and meeting targets on safety and sustainable transport. Many of the off-road routes have historic or cultural importance and there are promoted routes with some existing equestrian access, including Shakespeare's Avon Way, Centenary Way and Coventry Way.

Bridleways and Byways should not be used as access roads for MPV traffic for residential, retail, utility or industrial developments; they should be protected from the impact of development and mitigation ie alternative routes or additional routes should be created where impact is unavoidable. Increased MPVs on the road network can cause damage to the highway surface including the verge making it uneven for horses and limiting refuge available. Movement of construction/resident/employee traffic may coincide with times that equestrians are active on bridleways and byways (evenings and Saturdays particularly) and local roads to reach the off-road routes. HGV's are generally 2.5m wide and 4.5m high (some vehicles for component transportation significantly larger) which, on the road network, would sandwich a horse and rider between the vehicle and the extent of the highway with little room for refuge which may cause panic. The Highway Code Rule 163 advises a distance of 2m to be maintained between horses and vehicles when passing on the highway (and a maximum speed of 10mph) so any design should take account of this.

Safety assessments should be included in development proposals and consideration should be given that just because an existing off-road route is not well used does not mean it is without value; often equestrians do not use routes as they end on a busy road or have a slippery surface or a physical barrier. Investments into developments could remedy these issues and improve access, crossings, barrier removal and consequently usage.

A pitfall with green infrastructure, for example within an SUE such as the South West Rugby development, is when a management company maintain the grounds and charge residents a fee. This creates potential for conflict between residents and members of the public wishing to use the paths to travel from A-B as they may have done before the development was established. Paths should be publicly, not privately, maintained and resources invested in the public service eg Rights of Way/Highways to provide for this.

The NPPF para 105 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. It is imperative that equestrians are also included in paths, green infrastructure, NMU routes etc to avoid creating dead end routes or sandwiching horses and riders between cyclists and MPVs/HGVs. The bridleway and byway network is fragmented therefore development presents an opportunity to upgrade footpaths and connect existing routes accommodating a wider range of vulnerable road users. If equestrians are ‘designed out’ this will have unintended negative environmental effect of increasing MPV travel. Landscaping, surfacing and increasing canopy cover should consider widths and heights required by all users for safety and enjoyment.

The Warwickshire Local Transport Plan LTP4 emphasises the commits to increasing Active Travel. Horse riding is included in the Active Travel definition. Jesse Norman MP, Parliamentary Under –Secretary of State for Transport in a House of Commons debate on Road Safety, 5 November 2018 (1) stated: “We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders.....Horse riders are vulnerable road users—there is no doubt about that, and there never has been—and they have been included in the work we are doing.” House of Commons Transport Committee Active travel: increasing levels of walking and cycling in England Eleventh Report of Session 2017–19 Report, together with formal minutes relating to the report (London, 2019): “**Active travel covers any journey that is made by physically active means**, and covers such diverse activities as **horse riding**, skateboarding, roller skating, and riding a scooter.” p6. Several categories of public rights of way (bridleways, restricted byways and byways) and minor public roads are already **shared by cyclists, equestrians and other user groups**. Thus, as a general principle, we believe that, for maximum public benefit and fairness, the reciprocal approach should be implemented, i.e. that new paths should be shared with all user groups.

BHS welcomes the commitment to ‘provide safe and convenient active travel routes within and connecting out from the development, including, if necessary, contributing to upgrading or creating new routes’ (Transport, B, iv, p 62) and requests that upgrades and creations be at least bridleway status to maximise access. Trees or bollards referred to in vii should allow equestrian access also and BHS has guidance on vehicle barriers.

Equestrian activities for 30 minutes or more at least three times a week equates to the government definition of ‘moderate intensity exercise’ (NHS, 2016). 88% of adult riders are women, 85% of children who horse ride are girls (Sport England, 2023). Conversely, the majority of cyclists identify as men and boys therefore inclusion of all user groups is essential to

avoid disenfranchising women and girls. Currently RBC manages over 70 parks and open spaces totalling around 300ha, yet horse riders have access to only a 1.5km route accessed via Onley Lane. Progressive and inclusive councils, for example Solihull MBC, Chesterfield DC, include horse riding in their parks.

BHS welcomes the reference to 'equine and equestrian development' (E3 Rural economy, A, iv, p.27). There were 2,534 horses recorded in Rugby postcode areas CV21, CV22 and CV23 (DEFRA, 2024) therefore a total annual contribution to the economy of **£17,451,658** (BETA, 2023). Equestrianism supports rural employment such as livery yards, vets, farriers, venue hire, feed merchants, saddlers, etc. If developments negatively impact on safe access for equestrian activity (hacking out, riding, carriage driving) in terms of road safety and off-road routes then this has consequences: a) increased road incident/injury/fatality statistics b) horse owners resident in the borough who move their horses to an alternative location drive long distances daily to care for their horse, increasing their MPV use and carbon footprint c) horse owners transport horses to alternative locations for exercise and wellbeing again increasing their MPV use and carbon footprint.

Our BHS membership data shows that 75% of members ride or drive horses simply because they love it, and members believe 'their quality of life would be reduced without access to horses'. 22% of equestrians are under 16 years old and 15% are over 45 – it is an activity that can span lifetimes. Only 15% of BHS members identify as 'competition riders' with the vast majority enjoying their equines for recreational enjoyment, hacking off-road and on roads. 24% of people engaged in equestrian sport identify as disabled.

BHS welcomes further discussion regarding developments in terms of dimensions, surfaces and signage and has information here for developers and planners: <https://www.bhs.org.uk/go-riding-and-learn/access-and-bridleways-advice/>

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