

Re: Rugby BC Proposed Submission Local Plan Consultation (Regulation 19).

These comments are 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.

The Local Plan presents both opportunities and threats to equestrian access. BHS requests that the submission has the following information in mind.

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.*

DEFRA circular 1/09 Rights of Way[1] advises that:

7.1 Proposals for the development of land affecting public rights of way give rise to two matters of particular concern: the need for adequate consideration of the rights of way before the decision on the planning application is taken...

7.2 The effect of development on a public rights of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered.

Public Bridleways are used by pedestrians, cyclists and horse riders. In Warwickshire, only 17.7% of PRow are bridleways (and 0.4% byways) so equestrians have limited off-road access and rely on roads to get to them. Whilst the protection and improvement of Public Bridleways is welcome, the nature of the improvements proposed will be key. Changes such as surfaces should be consulted upon.

For horses. For people. For life.

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Registered Charity Nos. 210504 (England and Wales), SC038516 (Scotland) and 1382 (Isle of Man).

There are 2,534 horses registered in the CV21, CV22, CV23 postcode areas (DEFRA, 2024) which equate to a contribution of £6,887 per horse per annum to the economy, totalling **£17,451,658** (British Equestrian Trade Association, 2023). Equestrian activity equates to £1.2Billion in social value nationally per annum.

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 such as providing road crossings are fundamental in any new developments proposed. A safety assessment similar to a WCHAR is good practice in a significant development such the SUE in South West Rugby. 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 and risk assessment should take account of this.

The planning authority should consider whether additional permissive paths, included in proposals for residents' cycling and walking, could mitigate the impact to horseriders and follow examples set in housing developments eg Barratt Homes' Centurian Village <https://www.facebook.com/BHSRideOutUK/posts/on-monday-15-july-director-of-access-mark-weston-and-new-access-field-officer-fo/1028779099250704/> .

It is positive to see that Policy E3 is supportive of equestrian development and that horse riding is mentioned in the Transport Policy I1, recognising that active travel includes 'wheeling and **horse riding**'. Therefore, any Active Travel routes proposed would presumably include horse riders in their design. Policy S8 re South West Rugby refers to off-road networks for NMUs. References to cycling and walking networks /footways and cycleways are also included elsewhere; horses should not be sandwiched between MPV traffic and cycle lanes. BHS requests that the language is clear so that equestrians cannot be designed out of off-road routes.

The Cock Robin Wood and Cawston Spinney green corridor, for example, should be an active travel route to include horse riders and improve connectivity. The Pegasus crossing indicates horse riders are included but this needs to be explicit throughout to avoid misunderstanding and conflict.

The Lias Line has been developed with horse riders included. The Rugby Borough Council owned section of the route should also include all vulnerable road users.

If development negatively impacts safe access for horse riding in terms of road safety and access to off-road routes then this has consequences: a) increased road incident/injury/fatality statistics b) horse owners resident in the area who move their horses to an alternative location and 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.

The only off-road provision for horse riders on land owned by RBC is Diamond Wood, an approximately 2km route out of a portfolio of 230ha. The use of this is limited to riders who are prepared to ride along Onley Lane and are within a reasonable distance. Whilst there are livery yards in the vicinity (Onley Fields Farm, Tower Farm riding school and several private yards in Barby, Northants) there are many riders in other parts of the borough for whom the provision is inaccessible.

Since 2023 BHS has repeatedly asked Parks and Open Spaces for improvements on other POS in the borough to formalise equestrian access:

- Great Central Way Onley Lane to Abbey Street – WB stated this used to be shared with equestrians but barriers were erected at the time the path was resurfaced, excluding horse riders. Although this was mitigated by the Diamond Wood permissive route, Rugby has developed significantly since then therefore accessing the provision at Diamond Wood via the road network is not viable now and the GCW would enable more horse riders to safely access this.
- Great Central Way Newton Manor Lane to Bridleway R106 north of Newton – this has been used continuously by horse riders and other users for 20+ years. The surface is resilient and the path is minimum 4m wide. The livery Yard on Newton Manor Lane could also access this and other off-road/quiet road routes by crossing the ditch at OSGR SP523771
- Swift Valley Nature Reserve – the barriers to the entrance to the parking on USRN: 32800166 Brownsover Lane and the barriers at the top of the slope down to the parking could be relocated for horsebox/car and trailer parking on a permissive basis. Bridleway R102 is blocked at the bridge at OSGR SP 50444 79309. Horse riders used the path

under the M6 up to Churchover for 20+ years before this was obstructed and it is believed that a side roads order incorrectly recorded created the anomaly.

- Bridleway R104 –horse riders and pedestrians also use the field at OSGR SP523784 to go around and have done for 20+ years. The multi-user link under the A426 needs to have appropriate signage and the flooding issues resolved. Horse riders also use the southerly field edge of the park north of Coton Park.
- Horse riders have been prevented from using the path opposite the Hospital St Cross entrance through to Wentworth Road with no clear reason.
- 30 horse riders contributed to this map of routes ridden, barriers to horse riders and routes that would increase safety and access:

<https://www.bhsaccess.org.uk/dobbin/Ridingmap.php?map=westmidlands/ID00481/Rugby%20Borough%20Aspirational%20Map>

BHS appreciates RBC's due consideration of these comments.

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