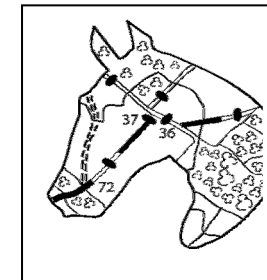


ESSEX BRIDLEWAYS ASSOCIATION

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LOCAL PLAN COLCHESTER COUNCIL ISSUES AND OPTIONS CONSULTATION QUESTIONNAIRE

QUESTION	PAGE	COMMENT
INTRODUCTION		
2	10	<p>We do not agree with the scope of the evidence base. It appears little consideration has been given to the need to enhance public rights of way, as required under the terms of section 75 of the NPPF.</p> <p>We are of the opinion the following documents should also be taken into account when reviewing the Plan:</p> <p>The Essex Public rights of Way Improvement Plan;</p> <p>Development and Public Rights of Way Advice Note For Developers and Development Management</p>

		<p>Officers 2010;</p> <p>Highways Agency's document entitled 'Assessing Sustainable Travel – Highways Agency Strategic Plan for Accessibility';</p> <p>The Rights of Way Circular 1/09</p>
OVERARCHING LOCAL PLAN ISSUES AND OPTIONS		
3	10	<p>We are of the opinion that one key planning issue facing Colchester that has not been adequately addressed is the effect any increased development will have on its rights of way and bridleway network. Colchester has very few bridleways and the ones that do exist do not, generally, link up to provide a good safe off road network. We believe this is largely because the equestrian sector has been virtually ignored by CBC and other relevant authorities in the past. Bridleways are few and far between in the district and very fragmented, resulting in horses being forced onto busy fast roads, putting the lives of horse riders and other road users at risk.</p> <p>Any increased development will greatly increase these risks by creating higher levels of traffic movements on local roads. Our experience is that CBC do not understand the needs of the equestrian sector and, therefore, do not consider horse riders when assessing planning applications or considering the impact of new roads on the rights of way network. They do not comply with Government guidelines and do not seek to improve the rights of way network for horse riders.</p> <p>The creation of bridleway links should be considered in relation to every planning application with a view, long term, to building up a safe interlinking off road network, especially as the number of vehicles on the roads increases. It must be remembered that bridleways are multi user tracks and can be used by all vulnerable sections of society - walkers, cyclists, horse riders and people with mobility problems.</p>
LOCAL PLAN VISION		
	11	<p>We note there is reference to 'good walking and cycling links' but bridleways are ignored. They should be included and given the same weight and importance as other rights of way.</p>

	12	We agree that green spaces are vital to the area. These green spaces should support leisure and outdoor exercise and include bridleways whenever possible, as multi user rights of way.
6	12	<p>The Vision should include the creation of a safe off road bridleway network, which several sections of society can enjoy, for free, without the need to worry about vehicular traffic.</p> <p>It is all very well building thousands of houses, but what do the occupiers of those houses do to entertain themselves? They should be encouraged to go out in the open air to exercise to keep healthy and fit and thereby reduce the burden on public resources. However, no one will exercise if it unsafe to do so.</p> <p>Public rights of way can be used free of charge and walking, cycling and horse riding are natural forms of exercise that do not require expensive infrastructure. Their use should be encouraged in the community and there should not be any discrimination against horse riders. All user groups should be treated equally.</p>
7		There should be far more regard for the Essex Public Rights of Way Improvement Plan which is an independent report that assessed the public's needs for rights of way. The NPPF specifically refers to the need to 'meet objectively assessed needs.' These needs were assessed in the PROWIP but this document seems to be ignored in the Colchester Plan.
LOCAL PLAN THEMES – CENTRES AND EMPLOYMENT		
11	20	One issue that is missing is reference to the benefits a healthy, prosperous equestrian sector would make to the leisure and tourist industries in the district. There needs to be policies to support the equestrian sector, to include the creation of a network of safe off road bridleways. Please see our General Comments in the Annex below and paragraph 7.6 in particular regarding these benefits.
12	20	There needs to be greater liaison between CBC and ECC, so they can work together to create the vital off road bridleway network. Specific personnel, who understand the equestrian sector, need to be appointed to be responsible for protecting the interests of horse riders and to ensure the necessary action is taken on both planning and highway fronts to created the network. At present there is no one who understands the equestrian sector or who is responsible for protecting its interests, despite the potential benefits to the district.
13	20	We do not agree that all relevant issues have been identified, as the employment benefits the equestrian sector could bring have been ignored.

		<p>We refer to you to paragraph 7.6 in the Annex to this response and to the detailed information contained in that paragraph.</p> <p>The equestrian industry makes one of the largest financial contributions towards the local economy of any sport, yet it is not mentioned at all in the Plan. The equestrian sector is the largest sporting employer in the UK. Racing and riding together provide 70,000 full time jobs with indirect employment comprising an additional 220,000 – 270,000 people; Horse owners, carers and riders in Britain spend more than seven billion pounds a year in gross output terms;</p> <p>If there were good safe off road riding routes in the district the equestrian sector would flourish and bring with it associated employment.</p> <p>Horses are predominantly kept in a rural environment and it is therefore mainly the rural areas that will benefit from an increase in the number of horses and equestrian facilities. Looking after horses is labour intensive and creates a great deal of employment. Each horse kept in the district is a financial benefit to the area because of its variety of needs – all costing money – money that will be put into the local community. This money is paid to livery yard owners, vets, farriers, feed merchants, grooms, saddlers, trainers, equestrian centres, studs, therapists, horse box builders, fencing contractors, garages – horses need to be moved by 4WD or horsebox – the list is endless. What is important to remember is that most of this money is spent in the local area – helping to create local jobs and boosting the local economy.</p> <p>Good equestrian facilities will boost tourism – people who want to ride will be attracted to the area; horse riding is an increasingly popular leisure activity and many farmers are now diversifying to include equestrian facilities and livery stables. All these activities have one thing in common – the need for a linking network of bridleways.</p>
RURAL COLCHESTER		
14	22	<p>We do not agree that all the correct issues have been identified, as the equestrian sector has been ignored. There is reference to agriculture, leisure and tourism but, once again, there is no acknowledgement of the existence of the equestrian sector at all.</p>

		<p>There is mention of the “delivery of rural jobs” but no details as to how this can be achieved. Our comments in response to question 13 are therefore repeated in relation to this question. Horses are predominantly kept in a rural environment and it is therefore the rural areas which will benefit from an expanding equestrian sector. This sector cannot exist without safe off road bridleways. By way of illustration, a livery yard was opened from scratch, with no horses at all to start with, in the Braintree area near a network of bridleways. There are now 25 horses kept at the yard and 3 people are employed full time and a further 8 part time. Most of these workers, if not all, live locally in a rural environment and the yard has therefore provided valuable local employment in the rural sector.</p>
15	22	<p>The Plan should be altered to conform to the terms of section 75 of the NPPF which places an obligation on Councils to <i>“protect and enhance public rights of way and access. Local Authorities should seek opportunities to seek better facilities for users”</i>.</p> <p>The Plan should state that the Council will be proactive in <i>seeking</i> a better rights of way network for all users equally, not just walkers or cyclists, and the policies stated in the Plan should be amended to reflect this positive approach. Further, the Council should adopt a positive policy to seek to use s106 (or CIL) funds to finance the creation of new bridleways in accordance with the Essex PROWIP and NPPF. A possible lack of funds for future maintenance cannot be used as an excuse for not creating bridleways in the district now. The Plan looks to the future and a future bridleway network cannot be jeopardised by a concern about future maintenance. If this argument was used in respect of other development then no progress would ever be made.</p> <p>The benefits a strong equestrian sector could bring to the district should also be acknowledged. The creation of equestrian facilities should be encouraged and bridleways should be created whenever any opportunity arises.</p>
16	22	<p>We support the delivery of rural jobs via the equestrian sector. Horse riding is predominantly an activity carried out in a rural environment. It is very important that environment is safe, otherwise the public will not carry out the activity. Safe, off road tracks are for all vulnerable users – walkers, cyclists and horse riders. Activities in the countryside should be encouraged in order to provide local employment and facilities. Local Plan policies should acknowledge the demand for these safe tracks and provide them for all users.</p> <p>Again, we would refer you to paragraph 7.6 in the Annex regarding the importance of the equestrian sector</p>

		in the rural economy.
17	24	<p>Not all correct issues have been identified. Once again, the needs of the equestrian sector have been ignored.</p> <p>We are pleased it is acknowledged that <i>“safe accessible places for social interaction, physical activity and interaction with the natural world”</i> all contribute to healthy lifestyles, but it is very disappointing that the Local Plan does absolutely nothing to help created these safe accessible places as far as the equestrian sector is concerned.</p> <p>The creation of more than 1,000 new houses per annum in the district substantially increases the number of traffic movements and congestion on the roads, thereby increasing the risks to horse riders on the roads. However, at the same time, nothing is being done to offset these risks. Bridleways are not being created in conjunction with new roads; riders are told there is no money for bridleway creation or future maintenance but these excuses for not providing and planning for bridleways are not used when it comes to footpaths and cycle ways. There appears to be an abundance of money for their provision and maintenance.</p> <p>Roads that used to carry little traffic are now full of speeding cars whose drivers have no understanding whatsoever of the need to pass a horse slowly and with care. The roads are death traps and horses need to be provided with safe tracks so they can avoid them. In reality, the opposite is occurring as more and more horses are forced onto the roads with every new house that is built.</p> <p>We note that access to open space and leisure facilities are as important as ‘doctors’ surgeries’, but the reality is that horse riders do not have access to horse riding facilities in the same way as walkers have access to footpaths and cyclists to cycle ways. Horse riders are constantly ignored by CBC. We note it is stated that informal recreation facilities “....which includes linked walking and cycling routes” are to be encouraged – but there is no mention of horse riders in the same manner. Once again, horse riders are ignored. A Local Plan that discriminates against one group in society is unsound. The Plan must be amended to include horse riding routes in the same way as walking and cycling routes. Multi user tracks would accomplish this objective.</p>

SUSTAINABLE TRANSPORT AND ACCESSIBILITY		
20	28	<p>The correct issues have not been identified. Horses are a form of sustainable transport but they have been totally ignored.</p> <p>The Highway Agency published a guide entitled “Encouraging Sustainable Travel” which acknowledged the needs of horse riders in exactly the same way, and to the same extent, as those of walkers and cyclists. We have an email from Roger Wright, the Principle Accessibility Officer to the Highway Agency, confirming the guide has not been superseded and still represents the HA’s policies. Horses are sustainable transport and need to be considered in exactly the same way as all other forms of transport.</p>
21	28	The Plan needs to address the creation of bridleways in the same way and to the same extent as it addresses the creation of footpath and cycle ways, otherwise it is unsound. It is illegal to ignore one sector of society because they are in the minority.
22	28	Transport is defined as ‘the method of moving goods or people from one place to another for work or recreational purposes’. People only seem to think of transport in relation to travelling to and from work. This is not correct. Horses are one of the oldest forms of transport and should not be forgotten when transport issues are addressed. We have yet to see one transport plan submitted as part of a planning application that even considered horses and bridleways, which is quite wrong. CBC should adopt a policy of requiring every transport plan submitted as part of the planning process to consider the needs of horse riders in the same way as it considers walkers and cyclists.
NATURAL ENVIRONMENT		
26	32	<p>We note a key issue is stated to be ‘developing a multi functional green infrastructure network’ but the method of development makes no reference to the protection and enhancement of public rights of way in the countryside, as required under the NPPF.</p> <p>What is meant by ‘multi functional green infrastructure network’ is not defined and is an extremely vague woolly term. We would ask that the definition is amended to include all rights of way.</p> <p>We note the acknowledgement that “countryside areas and strategic green gaps are likely to come under</p>

		increasing pressure within the Plan period”, which is extremely worrying when there is no detailed policy regarding what action will be taken to alleviate the pressure exerted on these green areas. It is vital they are not lost, otherwise there will be a huge impact on quality of life.
27	32	The Plan needs to be amended to make it quite clear that what is meant by the ‘green infrastructure network’ and ‘green spaces’ includes public rights of way (and bridleways in particular, when appropriate).
28	32	One of the most natural ways to enjoy the countryside, without damaging and polluting it, is on horseback, but this is almost impossible at the present time due to the lack of interlinking bridleways. These should be encouraged whenever possible to enable several sections of society to enjoy the countryside in safety, without having to negotiate fast moving vehicles.
GROWTH OPTIONS/DEVELOPMENT STRATEGY		
Health Infrastructure	36	<p>We note little information is available regarding health services. In view of the acknowledgement on page 23 that <i>“access to recreation, leisure and open space is as important as access to formal health facilities, such as hospitals, doctors’ surgeries and NHS dentists”</i> we hope that when any future development is planned, wherever that may be, CBC do more than just play lip service to these words and, instead, take positive action to ensure that everyone can exercise in a safe environment by ensuring that extensive multi user rights of way are incorporated into every development and are planned for the future at the outset. This has not been the case to date.</p> <p>Time after time we are presented with a situation where we are told it is ‘too late’ to include bridleways in development plans. This situation should never occur because CBC should protect the interests of horse riders in the same way as walkers and cyclists from the outset, when initial discussions take place with developers. CBC should have an active pro bridleway policy that is promoted in discussions with developers.</p> <p>There is no reason why the developers, who are making vast profits from these developments, should not finance the creation and future maintenance of these rights of way. There needs to be a positive drive and policy to create them, especially as bridleways can be enjoyed by so many groups of user and are free for the public to use. It is all very well building fancy gyms and stadiums, but they cost money to use and many sections of society are simply not in a financial position to pay to use them.</p>

Infrastructure for Non-motorised users	37	We note the emphasis is on walkers and cyclists. We ask that all three vulnerable user groups are treated equally and equestrians are not continued to be ignored, as in the past.
Infrastructure for walking and cycling	37	We note, once again, that the entire equestrian sector has been ignored. We would ask why? There are separate sections in the Plan specifically for walkers and cyclists but nothing whatsoever for horse riders. The NPPF does not differentiate between user groups but this Plan has blatantly ignored equestrian needs. The Plan is therefore not sound as it discriminates against horse riders and does not take their needs into account at all. An additional paragraph needs to be inserted setting out the same criteria for bridleways as is stated for footpaths and cycle routes.
Type of land identified for growth	38	We note that, again, the fact a horse is a legal form of transport has been ignored. Please see paragraphs [] of the Annex in this respect.
GROWTH STRATEGY OPTIONS		
29	40	<p>It is not appropriate for us to comment on which sites should be developed. However, whatever the choice, we ask that bridleways are incorporated in all developments so horse riders and other vulnerable users are kept off the increasingly busy road. We appreciate it may not be possible to include bridleways in some small developments, but the likelihood is that very large scale developments will be created, given the numbers of new houses that will be built. There is no excuse whatsoever for a huge network of bridleways to be created throughout all new development, linking with the few bridleways already in existence.</p> <p>A bridleway is the same width as a cycleway and cyclists can legally use bridleways but horse riders cannot legally use cycle ways. In our opinion, this is clearly nonsense. In many counties bridleways are now created rather than cycle ways as they are multi user routes for all vulnerable users, as it is more cost effective to build one multi user track than two or more separate tracks. There is substantial information available regarding how successful these multi user routes are in practise and we would be more than pleased to supply details if required.</p> <p>This organisation is more than willing to work with CBC to help to produce this network. However, no</p>

		progress will ever be made unless the equestrian sector is acknowledged and the attitude of CBC alters towards horse riders.
	49	<p>We note the comments “any improvements to these routes must include measures that enable pedestrians and cyclists to cross these routes safely”.</p> <p>We would ask how horse riders are going to cross the A12 safely without bridleway bridges being built. They are stranded on one side of a road or the other, with no safe crossing, unless their requirements are considered from the outset of any new development.</p> <p>This Plan is unsound unless the needs of horse riders are considered in the same manner and to the same extent as the needs of walkers and cyclists. Bridleway bridges need to be constructed over major roads from the outset. It is a very expensive exercise to have to alter the specification of a road bridge at a later date. Cycle paths and bridleways are both 3m wide and the cost of extra high parapets along the edge of a bridge is negligible in comparison to the overall cost of the road, and in relation to the costs that would be incurred if a horse rider or other road user is killed trying to cross</p>

ANNEX

COLCHESTER DISTRICT LOCAL ISSUES AND OPTIONS CONSULTATION **GENERAL REPRESENTATIONS BY ESSEX BRIDLEWAYS ASSOCIATION**

1. THE COLCHESTER DISTRICT LOCAL PLAN - SOUNDNESS AND FIT FOR PURPOSE

1.1 The Local Plan Issues and Options report provides us with an opportunity to identify any issues we think the new Local Plan should address and comment on possible ways that the Plan might deal with those issues.

1.2 To be fit for purpose, the Plan needs to be consistent with The National Planning Policy Framework (NPPF) and also a wide range of other policies, guidance, strategies and plans that have been produced, not only by the Colchester Borough Council (CBC), but also by central government, neighbouring authorities and other public bodies.

1.3 Essex Bridleways Association considers that the Issues and Options report is unsound on the basis that it has not been positively prepared, justified, effective or consistent with national and local policy for the reasons set out above.

2. PURPOSE OF OUR GENERAL COMMENTS

We wish to make these General Comments in order to give some background information to substantiate our specific representations and to avoid repetition.

3. BRIDLEWAYS ARE MULTI USER TRACKS AND SHOULD BE CREATED IN PREFERENCE TO JUST FOOTPATHS OR CYCLE WAYS

3.1 One of the main reasons we feel it is so important for bridleways to be promoted in the Local Plan, as opposed to just footpaths or cycle ways, is because bridleways are, in reality, multi user tracks. Walkers, cyclists, riders and people with mobility problems i.e. the sections of society who are recognised as vulnerable road users can legally use them. From an economic point of view, it makes sense to provide the public with one multi user track rather than constructing several separate tracks.

3.2.1 Mr. Richard Benyon MP, Minister for Natural Environment and Fisheries showed his support for multi user tracks in a letter to

Anne Main MP in 3011 when he stated:

“Multi-user routes have been shown to be readily adopted and well appreciated by local people. Where they are done well they bolster community cohesion and create a better understanding between users.”

3.2.3 Mr Benyon stated further:

“Horse riders are particularly vulnerable road users, and cycle routes can provide appropriate and important opportunities to avoid busy roads. There is potential for conflict in any situation where people share a public space, but the possibility of conflict is not reason enough to disregard ridden access; actual conflict could be resolved and any misplaced concerns reduced over time”

3.3 The creation of cycle ways in isolation normally depends upon a considerable standard of surfacing, whereas the same level of legality of access for cyclists, and removal of landowner liability, may be achieved without such standards being met by adopting the policy of creation at bridleway status.

3.4 Therefore, when we ask for bridleways to be considered and created under the terms of the Local Plan we are, in reality, asking for multi user tracks to be created for the benefit of the aforementioned users. These tracks will also benefit all other road users – people in cars and lorries do not want to have to negotiate vulnerable road users, especially horses. The community as a whole will also benefit from an economic, safety and health point of view.

4. THE NEED FOR BRIDLEWAYS - GENERAL– WHO GOES HORSE RIDING

4.1 Horse riding is commonly perceived to be an elitist activity. This is a profound misconception. Horse riders are evenly distributed across all social groups, whereas car-borne tourists tend to be upper or middle class. *[The State of the Countryside 4001, page 69 and also quoted in Making ways for Horses by the Equestrian Access Forum]*. You do not need to own a horse to enjoy equestrian sport. Many people do not want the commitment of horse ownership and either share a horse or ride at a local riding school or riding group.

4.2 The publication entitled “The Strategy for the Horse Industry in England and Wales’ (the Consultation) was published in 2005. It was prepared by the British Horse Industry Confederation in partnership with the Department for Environment Food and Rural Affairs, Department for Culture, Media and Sport and the Welsh Assembly Government. The purpose of the strategy was to foster a robust and sustainable horse industry.

4.3 One of the key findings to emerge from the Consultation was that improvement to an off-road riding and driving network was urgently needed, in order to encourage economic growth, increase tourism and provide a safe environment for learning opportunities.

4.4 The Equestrian Access Forum (the Forum) was formed as a result of the findings of the Consultation. The organisations comprised in the Forum are the British Horse Society, the Byways and Bridleways Trust, the British Driving Society and the National Federation of Bridleway Associations.

4.5 The Forum published a comprehensive study entitled “Making Ways for Horses – Off-road equestrian access In England. It identified:

(i) Riding is a growth activity. Between 1999 and 2006 the number of riders in Britain increased by 44% to 4.3 million, which works out to be 7% of the total population. The majority of horses – 1.4 million – are kept for private use. The main reason given by people for keep a horse is to go leisure riding i.e. riding out on public rights of way.

(ii) Despite the up swell of activity in the 1980’s riding out has only increased by 5% since 1999. This is in part due to:
the increase in speed and volume of traffic;
the disjointed nature of the equestrian rights of way network;
the lack of safe places to ride.

5. THE NEED FOR BRIDLEWAYS IN ESSEX - The Public Rights of Way Improvement Plan (the PROWIP)

5.1 The PROWIP is an important document as it evidences the specific needs and priorities of the people of Essex in relation to rights of way. It was commissioned under the terms of The Rights of Way Circular 1/09 (The Circular) and the Countryside and Rights of Way (CROW) Act 2000.

5.2 It acknowledges that a good public rights of way network promotes health and social benefits to local communities and states there needs to be a particular focus “on the provision of bridleways” i.e. bridleways were specifically identified in the Plan as being needed in the Essex area.

5.3 One of the main problems associated with providing rights of way is the cost, especially in these hard economic times. The PROWIP identified that one method of obtaining suitable funds was via the planning route and, in particular, the benefits of funding provided under the terms of s106 Agreements.

5.4 The PROWIP states:
Section 106 of the Town and Country Planning Act 1990 enables a planning authority and an applicant for planning permission to reach an agreement about various conditions as part of a development proposal. Section 106 agreements provide an opportunity to improve access on or adjacent to development sites. A great advantage of this funding is that it is considered to be 'clean' money able to be used for matched funding with government monies and together these can be match funded with European funds.

5.5 The PROWIP also identified:

Section 106 agreements are a good potential source of funding that can be taken advantage of in the relatively short term. In particular, funding for improvements and mitigating measures will be secured where new developments affect existing PROWs. In conjunction with wider planning authorities Section 106 negotiations also present an opportunity to make gains in the PROW network through the planning system and can be pursued on an ad-hoc basis whilst being more systematically planned for the future.

5.6 In the light of the above, we submit that the Local Plan should place an obligation on the Council to actively seek s106 funding (or CLT funding) from developers, whenever possible, to promote the improvement of the public rights of way network, especially bridleways, in accordance with the terms of the PROWIP and the Framework, as referred to below.

6. THE NEED FOR BRIDLEWAYS IN THE COLCHESTER AREA

6.1 The Essex Public Rights of Way Improvement Plan (PROWIP) states that the Colchester district only has 666km of bridleways compared with 6,003km of footpaths. There is a great shortage of safe off road riding tracks in the Colchester district.

6.2 The bridleway network in Colchester is very fragmented and many bridleways do not link together. Large areas of the district have no bridleways at all or are linked by busy dangerous roads that now cannot be negotiated on horseback.

6.3 The fact that Colchester does not have a linked bridleway network is very detrimental to the district, particularly as one of its main assets is its attractive rural nature, usually associated with horse riding. However, without somewhere to ride in safety, the potential benefits this asset could bring are lost.

6.4 The needs of the people living in the district for a linked, safe off road rights of way network are not being met now and, unless

Colchester plan for the future, they will never be met. They need to take action now, before it is too late.

6.5 The existing bridleway network needs to be identified and then a long term strategic network of linking bridleways needs to be planned to ensure proper provision is made for their creation in the future. A single bridleway may not be linked to any others when it is first constructed but over a period of time it could well develop into a strategic link in a circular route.

6.6 Horse riding is an expanding leisure, health and tourist activity and Colchester need to recognise this increasing demand.

7. THE NATIONAL PLANNING POLICY FRAMEWORK (The Framework)

7.1 The Framework confirms the Government's support for the protection and enhancement of the public rights of way network. Paragraph 75 provides:

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 including National Trails.

7.2 It also states in paragraph 14:

local planning authorities should positively seek opportunities to meet the development needs of their area; Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change

7.3 The Framework therefore places an obligation on the planning authority to be proactive in enhancing and improving public rights of way, seeking opportunities and meeting local rights of way needs. The Colchester Local Plan is not proactive as far as bridleways are concerned – they are virtually ignored in the Plan.

7.4 We believe the aims of the Framework can only be achieved with forward pro active planning, which would eventually result in a comprehensive linked bridleway network which would benefit all residents in, and visitors to, the Colchester district, as referred to in paragraph 6.5 above. Bridleways need to be constructed, as opposed to footpaths or cycle ways, whenever possible, in order that the future requirements of the district can be met.

7.5 In addition to the obligation detailed in paragraph 75, the Framework also has four other main policies that relate to rights of way:

(A) Economic policy – building a strong economy

- (B) Support – for the rural economy
- (C) Promotion of sustainable transport
- (D) Promotion of a healthy community

We would comment on these as follows:

7.6 (A) ECONOMIC POLICY AND (B) SUPPORT FOR THE RURAL ECONOMY

7.6.1 The equestrian industry makes one of the largest financial contributions towards the local economy of any sport. It makes no demands for a built environment to be provided at taxpayers' expense, unlike swimmers, footballers, gymnasts etc. All horse riders need are safe off road tracks that form part of a network of bridleways that they can enjoy with their horse, whilst viewing the countryside and participating in invigorating exercise. One of the main benefits of bridleways is that they can be used and enjoyed not only by horse riders but also by walkers, cyclists and the disabled.

7.6.2 The British Horse Industry Confederation (BHIC) report in 2009 stated:

*The equestrian sector is the largest sporting employer in the UK. Racing and riding together provide 70,000 full time jobs with indirect employment comprising an additional 220,000 – 270,000 people;
Horse owners, carers and riders in Britain spend more than seven billion pounds a year in gross output terms;*

7.6.3 In 2008 the North Lancashire Bridleways Society undertook a survey to assess the economic input of horse ownership into the economy of the Lancaster District and to establish the importance of horses to the economic health of the area. A full copy of their report is available on line: http://www.nlbs.org.uk/NLBS_Survey_Report_2009.pdf.

This survey gives some idea of the value of horses to a local community.

7.6.4 The key findings of this report were:

- (i) *The cost of horse ownership is £4,752 per year, the main cost of which is accommodation;*
- (ii) *The geographical source of services and goods is mainly based within a twenty-mile radius of the horse's accommodation, the details of which are presented in the analysis of the report;*
- (iii) *The Economic input of horse ownership into the local economy is £7,603,200 per year. A detailed breakdown of costs is presented in the conclusion of the report.*

7.6.5 This money is paid to livery yard owners, vets, farriers, feed merchants, grooms, saddlers, trainers, equestrian centres, studs, therapists, horse box builders, fencing contractors, garages – the list is endless. What is important to remember is that most of this money is spent in the local area – helping to create local jobs and boosting the local economy. Each horse kept in the district is a financial benefit to the area.

7.6.6 Horses are predominantly kept in a rural environment and it is therefore the rural areas that will benefit from an increase in the number of horses and equestrian facilities. The following statistics give an idea of the extent of the public interest and potential demand generally for equestrian facilities *[figures supplied by The British Trade Association (BETA) National Equestrian Survey 2011]*:

- i. 32% of the British population (19.7 million) have engaged in some activity connected to equestrianism;
- ii 3.5 million people have ridden in the previous twelve months (5.69% of the population). The 1999 estimate was 2.4 million, indicating a substantial growth;
- iii. 73% of horse riders are female;
- iv 25% of horse riders are aged under 16;
- v the majority of riders are women and children;
- vi leisure riding is the main equestrian activity, showing an increase of 9% in just over five years;
- vii access to safe off road riding – bridleways – would increase riding opportunities for 46% of people who ride once a week or less.

7.6.7 According to a report undertaken by the Women's Support and Fitness Foundation in March 2011, equestrian is the 6th most popular activity for women and the top outdoor pursuits activity.

7.6.8 If the Colchester district had a good, safe, extensive bridleway network it would encourage equestrian activity and all the financial and social benefits that are associated with it. At present, its bridleway network is disjointed and does nothing to help build a thriving equestrian community.

7.6.9 An extensive bridleway network would also encourage the growth of tourism in the area. Horse riders, cyclists and walkers are always attracted to an area that offers good scenery, good facilities and, above all, safe off road tracks on which to enjoy the benefits of the area. Many riders go on holiday with their horses or have weekend breaks away with them, and a good bridleway network would draw riders to the area. If this network also included safe parking for horse trailers and boxes it would be even more attractive to the equestrian sector, many of whom like to be able to access more inaccessible areas, like woodlands and parks.

7.6.10 Bridleways are essential facilities for the equestrian industry to flourish and to save riders from having to risk their lives riding on

the roads. The lack of a comprehensive bridleway network is inhibiting the equestrian industry's growth generally and the Colchester district is vulnerable in this respect.

7.7 (C) PROMOTION OF SUSTAINABLE TRANSPORT

7.7.1 It must be remembered that many years ago, today's roads had no vehicular traffic – the horse was the main form of transport. As the use of the car increased the previously safe roads were stolen by the motor vehicle – without alternative tracks being made available to the horse rider. This downward trend continued when thousands of old roads, by then classified as bridleways, were lost from the Definitive Map. Verges are allowed to overgrow and road and other signs are erected that prevent horses seeking refuge from the road.

7.7.2 Approximately 3,000 reported road accidents a year involve horses, often with fatal consequences. Many riders are simply too frightened to ride down a road to reach their nearest bridleway because it is too dangerous. If they are involved in a collision with a car their chances of sustaining serious injury is very high – riders and horses are unprotected. A damaged car can be repaired. A damaged horse or rider often cannot. They are totally vulnerable, yet many car drivers show them no consideration at all.

7.7.3 A great deal of consideration is given in local policies to the provision of safe routes for children – but no one thinks of providing safe riding routes for them – these are completely ignored.

7.7.4 The Highways Agency Strategic Plan for Sustainable Transport entitled 'Encouraging Sustainable Travel' (HASPST) confirms that horses are sustainable transport.

7.7.5 The HASPST was published over twelve years ago and has not been superseded. It still represents the Highways Agencies policies on sustainable transport and it is important as it confirms that horses are accepted as being a sustainable method of transport.

7.7.6 What is meant by "sustainable transport" is not specifically defined in the Local Plan or in the Framework but the nearest definition is in paragraph 35 of the Framework where 'Transport' is referred to as being "transport modes for the movement of goods or people". This definition therefore includes horses. People automatically think of cycles and buses as forms of transport but horses are often overlooked or forgotten completely.

7.7.6 The HASPST states:

"The Highways Agency now has a clear remit to operate, maintain and improve its network for all road users, including pedestrians, cyclists and equestrian to increase accessibility and to promote integration".

"we are not simply intending only to accommodate non-motorised users; where circumstances allow, we will actively seek to encourage their safe and increased use".

"we have also identified detailed objectives for the following user groups: 1. Pedestrians 2. Disabled people; 3. Cyclists; 4. Horse riders"

The objectives and actions set out for horse riders in the HASPST are:

Issue

Horse riding is an important part of daily recreational life, especially in rural areas. However, the standard of facilities to accommodate equestrians, either crossing or riding along the trunk road, is of variable standard. Heavy traffic and excessive speed can give rise to grave danger and discouragement for horses and their riders.

Objective

To provide improved facilities for horse riders, particularly in terms of crossing the trunk road network.

Actions will include:

*Establishing, in collaboration with other parties, the particular requirements of horse riders at both ground-level crossings and flyovers.
Developing advice for all Highways Agency staff on horse riders' facilities.*

Establishing a strategy for verges which link up bridleways which terminate at the trunk road.

Considering how provision for horse riding 'along' the trunk road can be made outside the highway boundary.

7.7.7 The Framework provides:

Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people.

7.7.8 We therefore submit that reference in the Local Plan to ‘transport’ and ‘sustainable transport’ should, where appropriate, include transport by horse and the needs of horse riders should be identified in the same way as those of other vulnerable road users whenever transport needs are assessed in order that the Local Plan is sound. The Framework and the HASPA both emphasise the need for Councils to be pro-active and exploit opportunities for the creation of sustainable transport, including bridleways. They should not merely sit back and wait for them to happen.

7.8 (D) PROMOTION OF A HEALTHY COMMUNITY – THE HEALTH BENEFITS OF HORSE RIDING AND OWNERSHIP

7.8.1 Inactivity is a key factor in the dramatic growth of obesity in the UK. 61% of adults and 30% of children are overweight or obese. *[Government statistics]* The Government has emphasised “Health and well being will be at the heart of everything local councils do.” It is at the heart of the Framework.

7.8.2 Horse riding has both cardiovascular and muscle conditioning benefits for riders – and for horses. Although it may seem as if the rider is not engaging in any physical exercise, an hour’s activity can burn a similar amount of calories to that of a 30 minute jog and cycle ride at 9mph *[Realbuzz.com]*

7.8.3 In 2011 the British Horse Society commissioned the University of Brighton in partnership with Plumpton College to research the physical health and the psychological and well-being benefits of recreational horse riding in the UK. A copy of the full report can be downloaded at:

[www.bhs.org.uk/Riding/Health/ Benefits of Riding.aspx](http://www.bhs.org.uk/Riding/Health/Benefits_of_Riding.aspx)

7.8.4 The Report confirmed that being involved with horses and equestrian sport has immense physical and psychological benefits for all participants. It also encourages young people to become self sufficient, early risers, capable, caring, active and healthy, to take an interest in the environment, and committed to regular routines.

7.8.5 The physical and psychological benefits of horse riding for the disabled have also been well documented. Please see: <http://www.rda.org.uk/home/therapy/> where it is stated:

Medical professionals recognise that there are significant therapeutic benefits for the rider. The warmth and three dimensional movement of the horse is transmitted through the rider's body, gradually making it more relaxed and supple, strengthening core stability, reducing spasms and improving balance, posture and co-ordination.

Riding offers an element of risk, often denied to many people, especially those who have been affected by an accident or serious illness and offers them the chance to regain mobility and a sense of achievement. People with congenital disabilities discover a new freedom in movement. Those with progressive diseases can retain mobility and remain active for longer.

7.8.6 It is not only people who will benefit from additional bridleways. Many horses are overweight and need more exercise, for both their physical and mental well-being. However, they need to take this exercise in a safe environment – away from dangerous roads.

7.8.7 The creation of bridleways will therefore help to support and enhance the promotion of health and well-being, for all sections of society, as advocated in the Framework.

8. THE FRAMEWORK AND ITS INTERACTION WITH OTHER GOVERNMENT POLICIES

8.1 The Framework states in paragraph 1 that it provides:

a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities

8.2 The Local Plan should, therefore, not be read in isolation, and other documents evidencing Government policy and local identified needs should also be taken into account when the Local Plan is assessed for soundness and fit for purpose.

8.3 We are of the opinion the following documents need to be taken into account when assessing the Colchester Local Plan for soundness and fit for purpose:

- (A) The Rights of Way Circular 1/09
- (B) The Essex Public rights of Way Improvement Plan (the PROWIP)
- (C) Highways Agency Assessing Sustainable Travel – Highways Agency Strategic Plan for Accessibility (the HASPST)

(D) Development and Public Rights of Way Advice Note For Developers and Development Management Officers 2010 (the DPROWAN)

We will deal with each of these documents separately:

A. THE RIGHTS OF WAY CIRCULAR 1/09 (THE CIRCULAR)

6.1 The Circular was published by DEFRA and gives advice to local authorities on recording, managing and maintaining, protecting and changing public rights of way. It replaces previous advice and guidance in circulars: 1/08, 2/93, 3/93, 17/90, 18/90, 32/81, which are now no longer valid.

6.2 Paragraph 1.4 states:

England's extensive network of public rights of way is a unique and valuable *resource, which provides the opportunity to experience the immense variety of English landscape and the settlements within it. Rights of way are both a significant part of our heritage and a major recreational and transport resource. They enable people to get away from roads used mainly by motor vehicles and enjoy the beauty and tranquillity of large parts of the countryside to which they would not otherwise have access. **Rights of way provide for various forms of sustainable transport and can play a significant part in reducing traffic congestion and harmful emissions. They are becoming more important as increases in the volume and speed of traffic are turning many once-quiet country roads into unpleasant and sometimes dangerous places for cyclists, equestrians, walkers and carriage drivers.***

6.3 Paragraph 1.5 states:

In many areas, rights of way help to boost tourism and contribute to rural economies. They can also provide a convenient means of travelling, particularly for short journeys, in both rural and urban areas. They are important in the daily lives of many people who use them for fresh air and exercise on bicycle, on foot, on horseback or in a horse-drawn vehicle, to walk the dog, to improve their fitness, or to visit local shops and other facilities. **Local authorities should regard public rights of way as an integral part of the complex of recreational and transport facilities within their area.**

B. The Essex Public rights of Way Improvement Plan (the PROWIP)

We refer to paragraph 6 above.

C. Highways Agency Assessing Sustainable Travel – Highways Agency Strategic Plan for Accessibility (the HASPST)

We refer to paragraph 7.7 above.

D. Development and Public Rights of Way Advice Note For Developers and Development Management Officers 2010 (the DPROWAN)

7.13 This document confirms:

The Highways Act 1980 places a responsibility on all Councils to protect Public Rights of Way. *Public Rights of Way are also a material consideration in the determination of any planning application.*

8. SUMMARY

8.1 In the light of the above, we consider the Plan is unsound as it is not:

(a) Positively prepared. The plan does not make provision for the equestrian sector and the infrastructure requirements for bridleways have not been positively promoted;

(b) Justified – the Plan does not put forward the most appropriate strategy for rights of way in the District and has not considered the reasonable alternatives i.e. the creation of multi user tracks (bridleways) that will benefit all vulnerable users, especially linking tracks that will enhance the existing fragmented network;

(c) Deliverable – in its current state it is not deliverable. Provision for off road riding can be deliverable and should be promoted in the Plan;

(d) Consistent with National Policy – as detailed above.