

Proposed Submission Version Local Plan

PART A - About You

1. Please complete the following:

Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique reference number.

Name of person completing the form: Victor Pogson

Email address: [REDACTED]

2. What type of respondent are you? Please select one option only.
If you are an agent please select the type of client you are representing.

A group or organisation

3. Please provide your contact details:

	Contact details
Organisation name (if applicable)	The British Horse Society
Agent name (if applicable)	-
Address 1	[REDACTED]
Address 2	[REDACTED]
Postal Town	[REDACTED]
Postcode	[REDACTED]
Telephone number	[REDACTED]

PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Plan as a whole

2. What does your comment relate to? Please select one option.

None of the above

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant		
Sound		X
Compliant with the Duty to Co-operate		

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

To be sound, the Plan needs to be Positively Prepared. The guidelines state the strategy must, as a minimum, seek to meet the area's OBJECTIVELY ASSESSED NEEDS.

1. The Warrington Local Plan fails to comply with this requirement, as it has completely failed to assess or take into consideration the needs of a large sector of local needs, namely the equestrian sector. The needs of horse riders and carriage drivers have not been taken into account throughout the plan. The Statement of Community Involvement requires consultation with a wide range of people and organisations, but the list of consultees provided in Appendix A to the document does not include any representative body for equestrian interests, whether national or local, whereas it does include bodies representing other active travel and recreational interests, for example a local cycling body and inland waterway users.

2. The need for improvement to the Rights of Way provision in Warrington is clear from 2.1.56, which clearly reveals a serious shortfall in provision of Rights of Way usable by equestrians. However, the Plan completely fails to address the need for Rights of Way provision for equestrian users, mentioning it only in the context of cycling and walking. There is no reference to the Council's Rights of Way Improvement Plan (ROWIP) in the document. NPPF paragraph 100 states that planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

1. Consultation with those representing equestrian interests should be undertaken to objectively assess the needs of horse riders and carriage drivers. The needs thus identified should be taken into consideration throughout the plan, with particular emphasis on issues relating to travel and transport, active travel, recreational facility provision and green infrastructure.

2. The Plan should include specific commitments relating to the improvement of Rights of Way provision for all users, including equestrians (both horse riders and carriage drivers)

I have made specific recommendations for modifications in other representation forms included in this response.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

No, I do not wish to participate at the oral examination

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

- File: Warrington Local Plan Equestrian Considerations.docx - [REDACTED]
- File: Dept for TransportBHS road safety survey 2021_North West Final.docx - [REDACTED]

You have just completed a Representation Form for Plan as a whole.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (**Part B**)

PART B - Representation Form 2

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

INF1 Sustainable Travel and Transport

2. What does your comment relate to? Please select one option.

Both of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable).

Paragraph 7.1.2. Policy INF1 part 1(b) and (e), 2(a) and (c)

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant		
Sound		X
Compliant with the Duty to Co-operate		

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

The policy fails to recognise that horse riding is a form of active and sustainable travel. The principles in 1(b) and (e) risk exclusion of or harm to equestrians, who are a legitimate road user class. Similarly, the policy in 2(a) and (c) is unsound in that it excludes a significant user category and specifically speaks of Rights of Way only in the context of walking and cycling. Thus it fails to objectively assess and meet the area's needs as there is a substantial equestrian user community. NPPF para 100 speaks of enhancing rights of way for users and does not constrain this to just cyclists and walkers as the Draft Local Plan does.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

In all the following, the wording should be amended by adding the relevant equestrian designations to the existing references to cycling and walking:

7.1.2 should incorporate horse riding as an alternative travel mode

INF1 1(b) should include horse riding to avoid exclusion

INF1 1(e) should include horse riders and carriage drivers

INF1 2(a) should include horse riders and refer to Multi-User, rather than cycling and walking networks to avoid exclusion

INF1 2(c) should include horse riding to ensure the safety and inclusion of equestrians

These amendments would ensure that the Plan is inclusive of all user groups and therefore meets the area's needs

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

No, I do not wish to participate at the oral examination

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

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Comments/file description

Warrington Local Plan Equestrian Considerations and Dept for TransportBHS road safety survey 2021_North West Final (see previous form)

You have just completed a Representation Form for INF1 Sustainable Travel and Transport.

Please select what you would you like to do now?

Complete another Representation Form on a different policy or part of the plan (**Part B**)

PART B - Representation Form 3

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

MD3 Fiddlers Ferry

2. What does your comment relate to? Please select one option.

Both of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable).
paragraphs 10.3.1 and 10.3.8. Policy MD3

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Compliant with the Duty to Co-operate	<input type="checkbox"/>	<input type="checkbox"/>

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

The policy fails to recognise that horse riding is a form of active and sustainable travel. It risks exclusion of or harm to equestrians, and is therefore unsound through failing to assess and meet the area's needs as there is a substantial local equestrian base.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

To make the plan sound, it must assess and meet the area's needs and those needs include the needs of equestrians. In order to achieve this, the following amendments are required within MD3:
10.3.1 Horse riding must be added to the community infrastructure requirements
10.3.8 Facilities alongside the A562 must also include equestrian needs to avoid risk of excluding equestrians from connections
MD3.3 29(b) should be changed to walking, cycling and horse riding routes
30 'footpaths and cycleways' should be changed to 'footpaths and bridleways/byways' or otherwise be made inclusive of equestrians
33 The Council's aspirations for the enhancement of the TPT and St Helens Canal should extend to the inclusion of equestrians
The above would enable the Plan to meet the area's needs in relation to MD3

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

No, I do not wish to participate at the oral examination

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

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If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

Comments/file description

Warrington Local Plan Equestrian Considerations and Dept for TransportBHS road safety survey 2021_North West Final (see previous form)

You have just completed a Representation Form for MD3 Fiddlers Ferry

Please select what you would you like to do now?

Complete the final part of the form, Customer 'About You' questions and submit response (**Part C**)

Warrington Local Plan – Equestrian Considerations

I welcome the opportunity to comment on the Warrington Local Plan and to be able to provide some reference information to support my representations.

Background Data

Number of Horses within Warrington

Further to a FOI request to DEFRA earlier in 2021, we have obtained details of the number of horse passports registered in postcode areas throughout England. Whilst the registered address of the passport holder can differ from the location at which a horse is kept, the figures nonetheless provide a good indication of the number of horses in a given location and have been found to tally with local estimates. The numbers for the Warrington postcodes are as follows (excluding Lymm):

Postcode	Number of Equines
WA1	119
WA2	276
WA3	1220
WA4	701
WA5	436
Total	2752

From this it can clearly be seen that the equine sector is very substantial within the Warrington area and should be taken into consideration in the creation of Local Plans.

Economic value of the equestrian sector locally

The British Equestrian Trade Association (BETA) represents more than 800 member companies. The most recent BETA National Equestrian Survey (2019)¹ indicated:

- £4,174 is spent per horse which represents a significant contribution to the economy
- The value of the equestrian sector is £4.7 billion per annum

Based on the figure of approximately 2750 horses kept in the Warrington plan area, this represents a GVA to the local economy of well over £11 Million per annum.

General Statistics

The most recent BETA National Equestrian Survey (2019) indicated:

- 847,000 horses in Britain
- 1.8 million regular riders of 3 million total
- Lack of access to horses and riding facilities is a barrier for 22% of lapsed riders returning

¹ <http://www.beta-uk.org/pages/news-amp-events/news/national-equestrian-survey-2019-provides-optimistic-view-of-industry.php>

Travel and Transport, including Active Travel plans

As legitimate road users equestrians desperately need safe routes because the accident statistics in respect of horse on the roads are horrific. There have been 4,140 incidents reported to the British Horse Society since 2010; 89% of these incidents involved vehicles passing too close to the horse and/or too fast.

I attach a press release dated 15th November 2021 which reveals the extent of the risk levels and stress suffered by equestrians in the North West and shows the importance of providing a transport system which is inclusive of and promotes equestrian safety.

The British Horse Society is the UK's largest equestrian Charity, with over 118,000 members representing the UK's 3 million equestrians. Nationally equestrians have just 22% of the rights of way network which is increasingly fragmented by roads, which were once safe rural routes, that have become busy thoroughfares.

In Warrington, according to the figures provided in paragraph 2.1.56 of the Local Plan, this figure is just 5% (7 miles out of a total of 136 miles of public rights of way). It is therefore even more important that any infrastructure relating to non-motorised users must consider equestrians in addition to walkers and cyclists.

Whilst the BHS supports the national initiative to encourage more cycling and walking as part of Active Travel Plans, it is imperative that the Council recognises that Active Travel ALSO includes equestrians.

Effect of excluding Equestrians from Active Travel Routes

If equestrians are not an included user on active travel routes, the consequence is that equestrians are left on the carriageway with lorries and cars passing them on the outside and cyclists passing them on the inside, which is another accident waiting to happen. It is therefore important that this aspect is considered in the risk assessment for such routes.

Newly Constructed Paths

Any physical creation of new paths to achieve Active Travel objectives within the county is to be welcomed (provided that equestrians are included, as a minimum, on those outside of large town centres) as this will enhance the ability of the public to increase its access to safe off road routes for leisure and commuting. District Authorities should take a strategic approach to Active Travel proposals within their administrative boundary - giving consideration to potential links outside their boundaries that could contribute to a more integrated network. The Society is happy to work with the Council to ensure that new paths are integrated with the public rights of way network in a manner in which maximum benefit for ALL users can be achieved.

Use of Existing Public Rights of Way

Many horses are kept on the urban fringe so it is important that equestrians are not excluded from routes that exit the urban areas into the surrounding environs.

Active Travel routes should not, in any way, compromise the use of the public rights of way by making them less amenable to existing lawful users of the right of way. In particular:

- Where existing routes are considered as part of the plan, it is important that all user groups are consulted so that the impact on other lawful users can be assessed and, if necessary, alternative measures discussed.
- For each specific proposal which uses a public right of way or minor road, the width, the proposed surface and the impact of increased estimated numbers of cyclists must be considered in order to design a route suitable for all legal users in each specific location.
- Any newly constructed paths should be integrated/physically linked with the existing public rights of way network where possible and needed, clearly waymarked and recorded on either the definitive map or another publicly accessible map as appropriate.
- Where proposed new or improved routes have crossing points or junctions with the main highway network, appropriate signal-controlled (or even grade-separated) crossings should be provided suitable for all user groups.
- Consideration should be given to the use of 'Quiet Lanes'² where the speed of traffic is reduced.
- Where motorised traffic is to be prohibited on either a right of way or minor road to facilitate cycling and walking, it must be remembered that this is likely to also benefit equestrians. Signage and structures must not impede equestrians.

Other Considerations to Note

Commuting cycling is likely to take place at times other than when recreational use takes place. Thus, a path used for commuting may well be used for recreational travel especially if it provides a circular route by connecting to other paths.

Several categories of public rights of way (bridleways, restricted byways and byways and minor public roads) are already shared by cyclists 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 cycle paths should be shared with other user groups unless there is a specific, unresolvable reason not to do so.

Use of Traffic Regulation Orders to prohibit use of a public right of way by a specific user group for the benefit of cycling needs to be fully justified and take into account the rights of other lawful users. It should be noted that the Defra Statutory Guidance to local authorities on Rights of Way Improvement Plans, 2002, states in para. 2.2.21:

'There is potential for conflict on ways carrying higher rights between different classes and types of users. Wherever possible proposals for improving rights of way should not unduly benefit one class of user at the expense of another. Improvements that are intended to benefit cyclists, harness-horse drivers, horse riders or walkers should not unduly restrict lawful MPV use of public vehicular rights of way'.

Equestrian use must be considered when Active Travel routes are proposed in new developments in order to create new links to the countryside beyond. Where new bridges/underpasses are proposed these should be suitable for equestrian use.

Central government support for including horses in Active Travel plans

² https://www.cpre.org.uk/wp-content/uploads/2019/11/quiet_lanes_1.pdf

The government's Cycling and Walking Investment Strategy Safety Review says: "1.2 But safety has particular importance for vulnerable road users, such as walkers, cyclists and horse riders. All road users have an equal right to use the road, and safety and the perception of safety are key factors in determining how far people use these modes of transport. The safer they feel, the more they will use these active modes of travel. The more people who use Active Travel, the fitter and healthier they will be, and the more their communities will benefit from lower congestion and better air quality, among a host of other benefits"(Jesse Norman, Minister for Transport p 4)

Jesse Norman in House of Commons debate on Road Safety, 5 November 2018:

"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"

And final point by Jesse Norman in debate: "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."

The Health Benefits of Horse Riding in the UK.

(Data comes from research undertaken by the University of Brighton and Plumpton College on behalf of The British Horse Society)

- 68% of questionnaire respondents participate in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimate that such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity.
- Women have been identified in government studies as a social group with relatively low levels of participation in physical activity. Some 93% of questionnaire respondents were women and 49% percent of female respondents were aged 45 or above. These are comparable figures to a major Sport England survey which found that 90 percent of those participating in equestrianism are women and 37 percent of the female participants in equestrianism are aged 45 or above. The gender and age profile of equestrianism is not matched by any other sport in the UK³.
- 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.

For further information, please see:

<https://www.bhs.org.uk/~media/documents/marketing/health-benefits-of-riding-in-the-uk-full-report.ashx?la=en>

<https://www.bhs.org.uk/~media/documents/access/access-leaflets/statisticsarow-1119.ashx?la=en>

³ Sport England (2010) Active People Survey (2010/11)

Road safety study reveals high levels of risk and stress for North West equestrians

North West equestrians and their horses are being subjected to alarming levels of stress and risk according to a new study that was funded by the Department for Transport (DfT) and commissioned by The British Horse Society (BHS). This is believed to be the biggest ever equestrian safety survey involving 940 North West participants (over 7,000 nationally) with ages ranging from 18 to 84 and with an average of 30 years' equine experience!

Only 3% of equestrians in the North West said they never felt stressed/anxious when using roads while 46% did so more than half the time. By far, the main contributors to this stress/anxiety were considered to be the behaviour of other road users (94%) and the characteristics of the road (57%). In order to place the perception of risk (region) equestrians felt when using roads into context, they were asked to express the level of risk they associated with other equestrian activities, ranging from routine handling and care to high-speed activities in open spaces. Riding, carriage driving and in-hand activities on roads were considered considerably more high risk in relation to all other activities; including eventing or cross-country jumping which was considered more of a moderate rather than high-risk activity!

It was encouraging that 98% of North West equestrians reported using safety measures such as wearing high visibility clothing and riding helmets when using roads. However, only 24% reported using a camera. 81% said they had experienced an incident while using roads with their horse (the majority experiencing more than 10) that they did not officially report, with only 34% having previously reported to the police and/or the BHS.

53 North West equestrians (6%) said they had been involved in a road incident in the previous year that resulted in injury to either a person or an animal. By far the majority of these incidents (49%) occurred when they were riding or handling a horse as opposed to using other forms of transport such as driving, walking, cycling or riding a motorbike.

The worry that equestrians in the North West face is not only affecting their enjoyment but it is also negatively impacting the amount of exercise horses and their riders and handlers are getting. The majority of North West equestrians agreed that exercise was important to maintain their horse's mental and physical health. Most felt they could not exercise their horse adequately without using roads; 61% felt that having to use or cross certain roads limited their ability to exercise with their horses and between 65-73% thought that they would exercise their horses more frequently and cover greater distances if they felt safer when using roads.

The study was conducted by Dr Dee Pollard and involved four elements of research: a review of existing published DfT and BHS data, a survey looking at how frequently equestrians used roads and off-road routes with their horses and what influenced their ability to do so, focus groups and interviews, which in turn informed a second survey focusing on road safety in the summer of 2021.

Horse i safety app

In terms of actions, The BHS has launched the Horse i app which equestrians can use to easily report an incident and to help build up an accurate picture of the realities of the dangers faced by equestrians and their horses on UK roads.

BHS Director of Safety Alan Hiscox commented: "This study has unearthed a number of truly shocking statistics and facts which will hopefully now drive action. Specifically, the extent of under-reporting needs to be addressed as soon as possible. We also need more innovation around safety, an increase in the use of cameras, and improvements to highways' and motoring policies like reduced speed limits, warning signs, more non-slip road surfaces and Highway Code amendments. We also need more safe places to cross and improved off-road riding facilities. And, ultimately, we need behavioural change from anyone currently using the roads who is not following best practice around safety and consideration for other road users."

Working towards improved equestrian road safety – overview from author Dr Dee Pollard

The findings from this study have helped to identify areas that could be targeted to help improve equestrian road safety in the UK. These would require a holistic, collaborative effort of a large number of road safety stakeholders at both local authority and governmental levels.

- Striving towards a transport system which is inclusive of, and promotes, equestrian safety (e.g. warning signage of equestrian activity for motorists, reduction of speed limits on rural roads and those frequently used by equestrians, non-slippery road surfaces, safe road crossings)
- Improved enforcement of road safety legislation
- Equestrianism recognised and promoted by governments and local authorities as a legitimate type of active travel and form of green exercise
- The provision of extensive and better connected off-road rights of way for equestrians which would allow them to plan safer and more frequent exercise sessions with their horses and that were user friendly and accessible for equestrians with disabilities
- Having standardised equestrian hand signals that are accepted by the traffic department and included in the Highway Code.
- Researching ways to disseminate knowledge of road systems, safety rules, recommended ways to mitigate risk and awareness of others on roads to different road user groups (equestrian and non-equestrian) and how this knowledge could best be kept fresh in people's minds.
- Identifying the most effective ways to change the behaviour of road users around horses
- Using awareness campaigns and advertising that humanises road users and helps break down any pre-existing stereotypes and helping bridge the disconnect between people using roads
- Encouraging the use of evidence-based equitation methods which would help habituate the horse to traffic/roads and which have the potential to improve the relationship and trust between a horse and their handler.

ENDS

Notes to editor

What counts as an incident?

Any unplanned event that has:

- resulted in a rider or handler feeling concerned (e.g. verbal abuse)
- resulted in a horse reacting in an unsettled way (e.g. excessive noise)

- the potential to cause injury to a rider, handler or horse even though it may not have at this time (a near miss)
- already caused injury to a rider, handler or horse

Contact details:

BHS Press Office



Images available:

The British Horse Society:

As the largest equine charity in the UK, The British Horse Society is dedicated to education, equine welfare, protecting and increasing access to bridleways and equestrian routes, and safety for horses and riders. The Society's thriving and active community of staff and volunteers are committed to improving the lives of horses everywhere.