

Patron Her Majesty The Queen

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

Bringing Horses and People Together

Helen Skinner
The Planning Inspectorate
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20 May 2024

Dear PINS

Re: APP/E1855/W/22/3310099

The comments below are from the British Horse Society however our volunteers in the county may also respond at a local level. The BHS previously submitted a neutral response to the application. The BHS has recently revisited the site to understand the objections from local equestrians to the plans in relation to access.

The British Horse Society is the UK's largest equestrian Charity, representing the UK's 3 million horse riders. Nationally equestrians have just 22% of the rights of way network – **only 15.3% in Worcestershire** - and are increasingly forced to use busy roads to access them.

Between 01.01.2023 – 31.12.2023 the BHS received reports in Worcestershire of 55 incidents on the road involving horses with one horse fatality.

This illustrates the importance of protecting, improving and extending safe off-road provision to prevent these numbers from increasing in the future. The NPPF para 104 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.*

There are 1001 horse registered to the DY10 postcode area (DEFRA, 2021). £6,887 per horse (BETA, 2023) is contributed to the economy benefitting local economies where equestrian activities thrive. This equates to a total of £6,893,887 contribution to the economy per annum. There are riding centres and livery yards in the area creating employment and using equine services (vet, farrier, feed, instructors, etc) as well as using the roads and off-road network in the vicinity.

The bridleway network, used by all vulnerable road users including equestrians, cyclists, pedestrians, pushchairs, wheelchair users and mobility scooter users in this area is fragmented. There is limited access for equestrians unless they ride/lead/drive on the roads.

The BHS would like to raise the following points:

- *How will the design protect and enhance the existing public bridleways and ensure they remain accessible during the project lifetime?*

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Public Bridleways Wolverley and Cookley 625B and 626B provide a valued link to access quieter lanes and the wider bridleway network. The Lea Castle Quarry proposals indicate that a conveyor belt would be located under bridleway WC 626B. Sudden movement, noise and continuous levels of noise can be a hazard for equestrians as horses are flight animals, therefore these hazards should be located away from the highway to avoid a psychological obstruction.

- *How would risks on the highway during the construction period be managed?*

The proposed access is from B4189 Wolverley Road. How would risks to horse riders, wheelers and pedestrians – all vulnerable road users – be mitigated? Construction and production will include HGV return journeys and therefore impact on the volume of traffic on the road network locally and within the site across the bridleway; the application document <https://e-planning.worcestershire.gov.uk/swift/MediaTemp/989-21905.pdf> describes the bridleway as the internal access road. Already mainly 60mph roads, the additional traffic and the added complication of vehicles regularly turning into the access road will make the road higher risk for vulnerable road users in the absence of speed restrictions or other traffic calming measures. The traffic could also damage the highway surface including the verge making it uneven for horses and limiting refuge available. Movement of the construction and production traffic – 154 movements per working day - will coincide with times that equestrians are active on the bridleways (evenings and Saturdays particularly) and local highways network 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 local to the site, 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.

- *Will proposed community benefits mitigate the impact of the quarry?*

Whilst adding to the length of the bridleway network, the upgrade to footpaths suggested as mitigation raise some concerns with equestrians. Width needs to be considered if the routes were to be between bunds; again, as prey animals, horses may react to narrow, enclosed spaces. Footpath Wolverley and Cookley 624 ends at Lea Lane although currently a steep flight of steps is the only access which for wheelers, equestrians and those with mobility issues would be impassable. Footpath Wolverley and Cookley 622 exits onto the footway at Wolverley Road where currently sightlines are limited.

The BHS has further information for reference available here: <https://www.bhs.org.uk/advice-and-information/free-leaflets-and-advice> .

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