

Patron Her Majesty The Queen

The British Horse Society

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Bringing Horses and People Together

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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.

7 April 2022

Development Management
Cherwell District Council
Bodicote House
BANBURY
Oxfordshire OX15 4AA

FAO Caroline Ford

Dear Ms Ford

Application no. 21/3475/OUT – Land adjacent to Lords Lane and SE of Hawkwell Farm, Bicester

Thank you for consulting the British Horse Society (BHS) on this application. The Society is the largest and most influential equine charity in the UK with over 117,000 members; it aims to protect and promote the interests of all horses and those who care about them, including the 3.5 million people in the UK who ride or who drive a horse-drawn carriage, through its core foundations of education, welfare, access and safety.

We have the following comments on the current development proposal for this site:

1. Impact on rural road users

With 1,338 horses registered to addresses in the OX25, OX26 and OX27 postcode districts¹, the BHS is particularly concerned about the additional traffic on local roads that can be anticipated from a development of this scale.

In the rural area around the site there is a good supply of rights of way (RoW), including bridleways. The network is however fragmented by roads, which walkers, horse riders and cyclists must use and cross to get access to and between off-road paths. Increased traffic on the local road network is therefore a concern to all vulnerable road users.

Equestrians are ranked alongside cyclists and immediately below pedestrians in the 'hierarchy of vulnerability' identified in the new Highway Code. They are particularly vulnerable in respect of road traffic because of the 'third brain' that is involved – i.e. the horse's perceptions and reactions, in addition to those of the rider and vehicle driver. Equestrians are also an especially risk-averse group, due to the financial and emotional cost of injury to their horse and the high risk of equine (and indeed human) fatality if involved in a road traffic accident.

¹ DEFRA equine passport data April 2021

The BHS keeps a record of road incidents involving horses. In Oxfordshire from Nov 2010 to Dec 2021 there were:

- 110 road incidents reported
- 7 horse fatalities
- 15 horses injured
- 2 human fatalities
- 20 humans injured

Research indicates that only around 10% of incidents are reported to the BHS.

In 2021 alone, in Oxfordshire there were:

- 55 road incidents reported
- 2 horse fatalities
- 2 horses injured
- 3 humans injured

It is likely that a substantial increase in road traffic in this area would deter some equestrians from using the road altogether, cutting them off from the local off-road riding network and having a severe impact on health and wellbeing of horses and riders alike.

2. Mitigation

The Society considers therefore that the applicant should seek to mitigate this impact by including equestrians in some of the new off-road routes that are proposed for walkers and cyclists. If the potential leisure pedestrians/cycle route in GI identified in the DAS Walking & Cycling Strategy were to be dedicated as definitive bridleways, this would provide off-road recreational access for ALL vulnerable road users, including horse riders.

This would maximise the benefit of the planned separate rail underpass which will provide a new route for pedestrians, cyclists and horse riders between Bucknell Bridleway 4 / Bicester Bridleway 9 and the proposed development. It would also contribute substantially to the implementation of the aspirational new multi-use route around the northwest of Bicester identified in the OCC RoW Management Plan 2015-25 (see section 3 below).

3. Policy context

- a) **Active Travel:** The government's Cycling and Walking Investment Strategy Safety Review https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/758519/cycling-walking-investment-strategy-safety-review.pdf states:

"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 - who also stated in the House of Commons debate on Road Safety, 5 November 2018 that "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")

- b) **Oxfordshire RoW Management Plan 2015-25** is a key reference within the current **Oxfordshire Local Transport Plan**. It sets out plans for developing the county's extensive network of RoW, which provide opportunities for people to take outdoor exercise as a leisure activity, as well as providing valuable pedestrian, equestrian and cycle links for getting around. Bicester is identified

as a Key Area for access development measures, which include the creation of a new multi-use route across this proposed development site (see <https://www.oxfordshire.gov.uk/residents/environment-and-planning/countryside/countryside-access/rights-way-management-plan> Appendix 2-Aspirational access networks, page 59).

This is not currently reflected in the application, which in the Walking and Cycling Strategy proposes potential leisure routes for pedestrians and cyclists only.

- c) **Oxfordshire draft Local Transport & Connectivity Plan** <https://letstalk.oxfordshire.gov.uk/LTCP>
- Policy 9 - Oxfordshire County Council will develop a number of Greenways across the county providing leisure commuting routes for people walking, cycling and equestrians.
 - Policy 25 - Oxfordshire County Council will consider the needs of equestrian users in roads and highways strategies and planning as well as operations. Oxfordshire County Council will continue to embed Aim 5 of the Strategy for the Horse Industry in England and Wales into relevant guidance and decision-making processes in order to improve safety, network connectivity and network quality for equestrians.

The application as presented does not take account of these draft policies.

d) **Cherwell Local Plan**

- **Policy ESD 17: Green Infrastructure –**
 - B.277 Within Banbury, Bicester and Kidlington the key components of green infrastructure are areas of open space, sport and recreation, sometimes linked by public rights of way. Public rights of way are protected in law and comprise four types: footpaths, bridleways, restricted byways and byways open to all traffic (BOAT). The County Council has responsibility for Public Rights of Way, and as such publishes a Rights of Way Improvement Plan and promotes routes for walkers, cyclists and horse riders in order to encourage sustainable access to the countryside. **In recognition of the health benefits of walking, cycling and horse riding this Council also promotes a number of circular walks and rides.**
 - B.279 Protection and enhancement of open space, sport and recreation sites and sites of importance to nature conservation will assist in maintaining the green infrastructure network. Green corridors consist of canals, river corridors and hedgerows, together with public rights of way. These can provide areas for walking, cycling and horse riding...
- **APPENDIX 8 Infrastructure Delivery Plan** Project 26o: Bicester pedestrian and cycle links - Joining up the horse riding network across the wider area using public rights of way to improve routes for commuting and recreation - to be funded by securing contributions from new development.

The proposed development has the capacity to support Cherwell District's Green Infrastructure Policy, but does not currently do so to the extent that it could.

The impacts of this development on local equestrians are neither identified nor addressed within this proposal, and the BHS therefore OBJECTS to this application as currently presented. I would however be happy to discuss our comments further with the applicant or their representative.

Yours sincerely,

Petronella Natrass

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