

Our ref Pre-Submission LDP Representation
Your ref

10 March 2014

0040-5068-S1-1234
**MALDON DISTRICT
COUNCIL**

Princes Road
Maldon
Essex CM9 5DL



Enquiries to: Planning Policy
Email: policy@maldon.gov.uk

Dear Sir / Madam

**Essex Bridleways Association Representation to the Pre-Submission Local Development
Plan public consultation**

The information contained within the representations listed below were made by Sue Dobson, Bridleways Development Officer for the Essex Bridleways Association and should be read in conjunction with the supporting evidence contained within representation: **0040-5068-S1-1234**.

- 0040-5069-S2-1234
- 0040-5070-S3-1234
- 0040-5071-S4-1234
- 0040-5072-S5-1234
- 0040-5073-S6-1234
- 0040-5074-S7-1234
- 0040-5075-S8-1234
- 0040-5076-D1-1234
- 0040-5077-D3-1234
- 0040-5078-E1-1234
- 0040-5079-E5-1234
- 0040-5080-N1-1234
- 0040-5081-N3-1234
- 0040-5082-T1-1234
- 0040-5083-T2-1234
- 0040-5084-I1-1234
- 0040-5085-PM-1234

Kind regards,

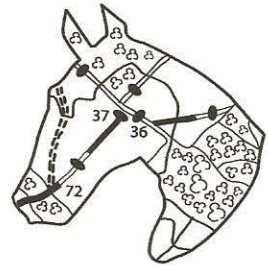


Planning Technician



**ESSEX
BRIDLEWAYS
ASSOCIATION**

Registered Charity No. 801530



Maldon District Council
By Email: policy@maldon.gov.uk

8th March 2014

Dear Sirs,

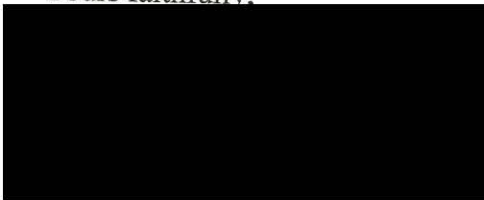
Re: The Maldon District Local Development Plan

Please find attached the response from Essex Bridleways Association with regard to the current public consultation of the new Local Development Plan. As requested by Emily Hall in her email to me of 6th March, I attach a completed form Part 1, together with individual Part 2 forms for each of the Policies S1, S2, S3, S4, S5, S6, S7, S8, D1, D3, E1, E5, N1, N3, T1, T2, I1 and Proposals Map. I have also included one copy of the Part 2 points 2.6/ 2.7 form as this covers all of our responses which I trust is acceptable.

As discussed with Emily, our responses relate to rights of way and our evidence relating to these covers all our concerns with the Policies as written, and would ask that this supplementary evidence document is read in conjunction with each of our Policy responses on the forms in Part 2.

I trust that this is in order but please let me know if you need any further information to enable the Inspector to consider our submission. I therefore look forward to receiving the updates on the progress of the Plan in due course.

Yours faithfully,



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Part 2 - Regulation 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012 "Pre-Submission LDP" consultation

Please note that all comments on the Pre-Submission LDP consultation should be provided by completing Part 2 of this form. A separate completed Part 2 should be provided for each comment made within a representation.

2.1 To which part of the Maldon District Pre-Submission Local Development Plan (LDP) does this representation relate?

a. Paragraph number

b. Policy reference

S1

c. Proposals map

d. Other section (please specify)

2.2 Do you consider the Maldon District Pre-Submission LDP to be ... (✓ as appropriate)

a. Legally compliant

YES ☒

NO ☐

To be legally compliant the LDP has to be prepared in accordance with the Duty to Co-operate and legal and procedural requirements. This is required by Government guidance.

b. Sound

YES ☐

NO ☒

To be 'sound' a Local Plan should be positively prepared, justified, effective and consistent with national policy. This is required by Government guidance.

If you do not consider the LDP to be sound, please complete section 2.3 below

2.3 Do you consider the Maldon District to be unsound because it is not ... (✓ as appropriate)

a. Positively prepared



To be positively prepared the Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements

b. Justified



To be justified the Plan must be:

- Founded on a robust and credible evidence base
- The most appropriate strategy when considered against the reasonable alternatives

c. Effective



To be effective the Plan must be:

- Deliverable;
- Flexible;
- Able to be monitored

d. Consistent with National Policy



The Plan must be consistent with Government guidance as set out within the National Planning Policy Framework

On the following pages, please explain why you think the Plan is unsound or not legally compliant, and set out any changes you feel should be made to the Plan to make the Plan sound or legally compliant.

Please note: As there will not normally be a subsequent opportunity to make further representations, please include all the information, evidence and supporting information necessary to support/justify your representation and the suggested change(s) to the Plan. After this stage, further submissions will only be invited at the request of the Planning Inspector, based on the matters and issues the Inspector identifies for examination.

- 2.4.** If you consider the Maldon District LDP to be unsound or not legally compliant please explain why in the box below. Please be as precise as possible. Please also use this space for any comments in support of the LDP.

If the box is not big enough for your comments, please attach another page marked appropriately.

Policy S1 – Sustainable Development

In our opinion, this Policy does not make provision for the equestrian sector as it does not contain any reference to enhancing the rights of way network to include access for horse riders. Also the priority for sustainable transport does not include horse riding, against the principles of the HASPST as detailed in our supporting evidence document.

2.5. Please explain in the box below what change(s) you consider necessary to make the Maldon District LDP legally compliant and sound.

Please be as precise as possible. Please explain why this change will make the Maldon District LDP legally compliant and sound. It will be helpful if you are able to put forward any suggested revised wording of the policies or supporting text.

If the box is not big enough for your comments, please attach another page marked appropriately.

The following is a revised wording for the text which in our opinion will make the Plan sound:

Policy S1 Sustainable Development

9. Add after the words 'green infrastructure network "to include the rights of way network maximising the opportunities for cycling, walking and horse riding"

13. Add after the words 'where travel is necessary, prioritise sustainable modes of transport, including opportunities for horse riding, and improve access for all in the community".

P	S	C					/		
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2.6 Do you consider it necessary to attend and give evidence at the hearing part of the examination? (✓ as appropriate)

NO, I wish to communicate through written representations

☐

YES, I wish to speak to the Inspector at the hearing sessions

☒

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination

2.7 If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary

If the box is not big enough for your comments, please attach another page marked appropriately.

The equestrian sector has been largely ignored by successive councils in the past resulting in a fragmented network of public access within the Essex area, and to some extent, countrywide.

The Essex Bridleways Association seek to redress this anomaly and would very much appreciate the opportunity to set out to the Inspector the benefits that an enhanced public right of way network could bring. This it feels can be better presented in person than relying on the written representations which are not always interpreted in the same way by all those who read them.

This is the end of Part 2 (Regulation 19 and 20) of the response form. Please complete this form for each representation you wish to make. You only need to complete Part A once. Please submit all of your response forms together.

Essex Bridleways Association**Response to Maldon District Local Development Plan****Supporting Evidence which applies to all the Policies detailed on Forms 2.4**

As stated in the opening chapters, the LDP sets out its planning strategy for future growth over the next 15 years; the core responsibility of this is to respond to local ambitions, aspirations and priorities for the District over the plan period from 2014 to 2029. This chapter goes on to say that, in point 1.9, that the LDP is in compliance with national planning policy, currently set out in the National Planning Policy Framework (NPPF). The objectives set within the Spatial Vision and Developmental Strategy (paragraph 2.5) specify where the Council will develop the facilities to achieve this spatial vision.

Essex Bridleways Association considers that the Plan is unsound on the basis that it has not been positively prepared, justified, effective or consistent with national policy for the reasons which will be clarified below.

The NPPF has four main policies that affect rights of way, and these are:

Economic Policy – building a strong competitive economy;

Support – for the rural economy;

Promotion of sustainable transport;

Promotion of a healthy community.

The overall plan does not make provision for the equestrian sector. Maldon District covers an area of around 36,000 hectares with around 70 miles of coastline; it has a rights of way network of 495.41 km which includes 34.73km of bridleways (source – Essex Rights of Way Improvement Plan). This figure, at only 7% of the total rights of way in the Maldon district, shows it has the worst provision of bridleways against other rights of way in the whole of the County of Essex.

Maldon District is therefore sadly lacking in bridleways compared to other districts. This is a missed opportunity, particularly as one of the main assets of the area is its attractive rural nature, which would usually appeal to horse owners and riders. However, without somewhere to ride in safety, the potential financial and other benefits this asset could bring are lost to the community. The huge contribution that the equestrian sector could make to the local economy, not only through horse ownership, but also through employment and businesses directly related to horse ownership, for example vets, farriers, feed merchants as well as to the potential contribution of the equestrian sector to the tourism industry, which is strongly promoted in the Plan, should be carefully considered.

Bridleways should be promoted in the Maldon District Local Plan, (the Plan) as opposed to just footpaths or cycle ways, because bridleways are, in reality, multi user tracks. They can be legally used by walkers, cyclists, riders and people with mobility problems i.e. the sections of society who are recognised as vulnerable road users. From an economic point of view, it makes sense to provide the public with one multi user track rather than constructing separate tracks.

When we ask for bridleways to be considered and created under the terms of the Plan we are, in reality, asking for multi user tracks to be created for the benefit of the aforementioned

users. They will also benefit all other road users – people in cars and lorries do not want to have to encounter vulnerable road users. The community as a whole will also benefit from an economic, safety and health point of view.

Mr Richard Benyon MP, former Minister for Natural Environment and Fisheries showed his support for multi user tracks in a letter to Anne Main MP in 2011 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.”

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”

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.

Horse riding is commonly perceived to be an elitist activity. This is a profound misconception. Horse riders are evenly distributed across all social groups; *[The State of the Countryside 2001, 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.

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.

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;

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_Report2009.pdf

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.***

(It is reasonable to consider these costs as an under-estimate of current expenditure due to inflation and the north/south regional cost difference).

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 for the Maldon District 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 area is a financial asset.

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;
- iv The majority of riders are women and children;
- v leisure riding is the main equestrian activity, showing an increase of 9% in just over five years;
- vi access to safe off road riding – bridleways – would increase riding opportunities for 46% of people who ride once a week or less.

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.

If the Maldon 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, all it has are a few disjointed bridleways that do nothing to help build a thriving equestrian community. There are few equestrian facilities to attract the average horse owner in the Maldon district.

An extensive bridleway network would also encourage the growth of tourism in the area, an aspect which is strongly promoted within the Plan. 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.

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 Maldon district is particularly vulnerable in this respect. Within the Maldon district, the roads linking all the major towns are impossible to use by foot, cycle or horse – the only safe way to travel between these towns and villages is by motor vehicle. Despite these routes being set out thousands of years ago when the horse or foot was the only mode of transport, there is no safe alternative to the motor car. The Council needs to either address the issue of safe access on verges alongside these roads (under the Highways Act s71) or create multi-user paths between these settlements.

HEALTH BENEFITS OF HORSE RIDING AND OWNERSHIP

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

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.

4.4 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.

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.

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.

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.

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.

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 – 1.2 million – are kept for private use. The main reason given by people for keeping 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; and

the lack of safe places to ride.

The Plan, therefore, does not meet the requirements of the National Planning Policy Framework as, considering the foregoing, it is indisputable that the equestrian industry does, and can, bring economic prosperity, supports the rural economy, promotes sustainable transport and greatly contributes to the promotion of a healthy community. We are also astonished that the LDP Pre-Submission Consultation Maps fail to differentiate the status of public paths; as a result insufficient representation may have been the case concerning connectivity of bridleways.

In ignoring the needs of such a large beneficial user group, we consider that the Plan is unsound as it is not:

- (a) Positively prepared – the Plan does not make provision for equestrian access as the infrastructure requirements have not been objectively assessed;
- (b) Justified – the Plan does not put forward the most appropriate strategy for rights of way in the area and has not considered the reasonable alternatives, ie the provision of bridleway links within the District;
- (c) Deliverable – in its current state it is not deliverable; provision of off-road riding can be deliverable and should be promoted in the Plan;
- (d) Consistent with National Policy – detailed below are the main documents which should be taken into account:

- The National Planning Policy Framework (the Framework)
- The Rights of Way Circular 1.09 (the Circular)
- The Essex Public Rights of Way Improvement Plan (the ROWIP)
- Highways Agency Assessing Sustainable Travel – Highways Agency Strategic Plan for Accessibility (the HASPST)

- Development and Public Rights of Way Advice Note for Developers and Development Management Officers (the DPROWAN)

The National Planning Policy Framework (the Framework) - 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.

The Framework also states:

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.

The Framework 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 Rights of Way Circular 1/09 (the Circular) published by DEFRA 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.

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.*

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.***

Paragraph 2.1 states:

Local authorities should aim to provide the public with information on the full range of

choices available for enjoying the rights of way network itself and the many other publicly accessible routes, such as permissive paths, and public open space such as commons, woodlands and parks. Information should be accessible, comprehensive and well promoted and it should be a key element in rights of way improvement plans. Authorities will tailor their publicity planning to local needs, opportunities and constraints but imaginative schemes already in place in the country include production of walking, riding and cycling leaflets, offering guided walks and rides, organising or participating in festivals and making information available on a website that shows the availability of public rights of way and their relationship to other areas of publicly accessible land. Publicity also provides an opportunity to promote understanding of the countryside and of environmental concerns. Paragraph 5.1 goes on to say that:

Improved management, combined with better information and the creation of new routes in carefully chosen locations would make a significant difference to people who use, or who would like to use, footpaths, bridleways, restricted byways and BOATs. In areas where rights of way are fragmented, new links between existing routes would provide a more extensive and useful local network than exists at present. Local highway authorities also need to improve the management and maintenance of the existing network. In order to meet the Government's aim of better provision for cyclists, equestrians, walkers and people with mobility problems, highway authorities need to understand the use and demand for rights of way. They will, thereby, be able to meet the spectrum of needs and expectations of people with all levels of interest and ability.

The Essex Rights of Way Improvement Plan (**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 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".

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, soon to be replaced by the Community Infrastructure Levy (CIL).

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."

The PROWIP also identifies:

"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."

In the light of the above, we submit that the Plan should place an obligation on the Council to actively seek s106 or CIL 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 National Planning Policy Framework.

Highways Agency Assessing Sustainable Travel – Highways Agency Strategic Plan for Accessibility (the HASPST) - 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 many ancient routes failed to be recorded during the Definitive Map process in the 1950's. Verges are allowed to overgrow; road and other signs are erected that prevent horses seeking refuge from the road.

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.

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.

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. 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 walkers and cyclists as forms of transport but horses are often overlooked or forgotten completely.

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 set out for horse riders 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.

The Framework provides:

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

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. The Framework and the HASPST 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.

We therefore request that consideration is given to equestrian access across and along trunk and other busy roads within the District, especially the new link roads proposed in the Plan, in accordance with the HASPST.

Development and Public Rights of Way Advice Note for Developers and Development Management Officers (the DPROWAN) - 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."

In summary, we would submit that these aims can only be achieved with forward pro active planning that would eventually result in a comprehensive linked bridleway network that could benefit all residents in, and visitors to, the Maldon district. Bridleways need to be constructed, or footpaths/cycleways upgraded whenever possible, in order that the future requirements of the district can be met. 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.

Horse riding is an expanding leisure activity which is extremely beneficial to the economic prosperity and health of the District and Maldon District Council are being negligent in excluding the future needs of the industry from the Local Plan.