

Patron Her Majesty The Queen

The British Horse Society

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

Sent by email to:

planningpolicy@chichester.gov.uk

25th January 2019

Dear Sir

The British Horse Society (BHS) is the UK's largest equine charity and equestrian membership organisation and the governing body for recreational riding. Its charitable objects include the promotion of equestrian safety, particularly on roads, and equestrian access to bridleways and other off-road multi-use routes for the public benefit. On behalf of The Society I would like to make the following comments:

Chichester Local Plan Review 2016-2035 Preferred Approach

The Society's priority when commenting on this document is to try and ensure that the policies and wording in the text include commitments to support and protect vulnerable road user groups, including equestrians (West Sussex Transport Plan, page 32, para 1.4.5), from the dangers they face on local roads due to the inevitable increase in traffic on these roads brought about by planned housing development.

The Plan area covered is home to a large number of equestrians, who bring significant economic benefits, especially to rural communities, but unless they have access to a safe network of bridleways, byways, and other off-road informal recreational routes which they can use daily, the dangers to horse riders will increase, and the industry will struggle to survive.

Policy S18: Integrated Coastal Zone Management for the Manhood Peninsula (page 68)

Equestrians on the Manhood Peninsula feel increasingly unsafe on the local roads they have always used, where the speed and volume of vehicles has grown considerably, and will do so even more as a result of the proposed housing development. There are now more than 500 horses kept in the area (Manhood Riding Club count) in private stables, livery yards, and the local Riding School (at which the Chichester Group of Riding for the Disabled is based).

We would, therefore, absolutely support **objective 5** of this Policy "*Improve infrastructure to support sustainable modes of transport, especially cycle ways, bridleways and footpaths, including the National Coastal Footpath*".

We would suggest the best way to do this is to ensure that at least one multi-use route (bridleway) is provided through, or around the fringe of developments, which can also serve as a green corridor for leisure and recreation and, and benefit health and well-being, wildlife and biodiversity. These routes can form the basis of a safe non-motorised user (NMU) network and link with existing public rights of way (prow) where possible.

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Policy S20: Design (page 74)

Bullet point 5 – wording is supported “*incorporates and/or links to high quality Green Infrastructure and landscaping to enhance biodiversity and meet recreational needs, including public rights of way.*” However, it is important as mentioned above that this includes ‘multi-use’ public rights of way for the benefit of all.

Transport Infrastructure

Para 5.15 – very good to see “*bridleways*” included in this para.

Para 5.16 - The wording “*There is an extensive public rights of way network across the plan area...*” is misleading. The wording implies that this prowl network is available to all users, whereas on the Coastal Plain the prowl network consists almost entirely of footpaths, which are not available for use by cyclists and equestrians. Upgrading appropriate/suitable prowl to bridleways would contribute to the West Sussex Transport Plan (2011-2026) aim of “*improving safety for all road users*”, mentioned in **para 5.18**.

Policy S23: Transport and Accessibility

Bullet point 8 - Our view is that the objective “*improving safety for all road users*”, should be included in the actual Policy wording, not just in the accompanying text. However, it is good to see ‘public rights of way’ included, which need to be multi-use bringing safety benefits for all vulnerable road users.

Countryside and Countryside Gaps (page 82)

Para 5.37 – Absolutely agree the plan area’s countryside is an important and diminishing resource, and the Council’s aim to protect the countryside from the urbanising impacts of development is welcomed. For existing and future residents, the opportunity to enjoy ‘informal recreation’ (walking, cycling, horse riding) in the countryside is important for leisure, health, and well-being. The Council needs to take a very active role in ensuring that any development provides benefits, most likely in the way of safe, off-road multi-use routes (green links), and the mention of this in **para 5.40** is welcomed.

Policy S32: Design Strategies for Strategic and Major Development Sites (page 92/93)

The references in **Point b**, “*movement and access arrangements and Green Infrastructure provision*”, in **Point e**, “*community leisure and recreation facilities as appropriate*”, and **Point g**, “*contain a Green Infrastructure framework to ensure that public and private open space standards are met, relate well to each other and to existing areas and that the new spaces are safe, convenient, accessible and functional*” are welcomed.

However, it is important that leisure and recreational routes, and new prowl connect to the wider countryside for public benefit, and are not just contained within a development. There are many examples in the county where new routes have been created across or on the fringe of a development, which link to a wider network of recreational routes. The National Planning Policy Framework (NPPF), para 98, 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*”

Policy AL1: Land West of Chichester (page 96)

Point 4 – whilst welcoming the provision of “*open space and green infrastructure*”, this development provides an excellent opportunity to improve links to the wider countryside, in particular to BW 270 and Park Lane (which should be formally dedicated as a prowl).

Point 10 – An “*appropriate landscaping buffer*”, is also an excellent opportunity to provide a multi-use prowl (bridleway), for the safety and enjoyment of all vulnerable road users, which as a ‘green corridor’, would also contribute to green infrastructure.

We would also request that when looking at ‘key landscaping’ of the Centurian Way (CW), the issue of upgrading this to a multi-user path where possible, to include equestrians is considered, so that they can also benefit from a safe and secure off-road environment. The CW is the only disused railway line in the

county that is not available for use by all NMUs. The Worth Way and Downs Link are fully multi-use, and are highly valued and well used.

Policy AL2: Land at Shopwyke (Oving Parish) (page 99/100)

Point 9 - Despite repeated requests for the proposed bridge connection across the A27 at Coach Road (a route used by all NMUs until it was severed when the A27 was realigned) to also be made available for equestrian use, it would appear from the Policy wording that horse riders continue to be excluded, despite the large numbers of horses kept in the Oving area.

At present, riders have to box their horses over the A27 to access the safe network of bridleways and riding routes in the National Park, which is a situation contrary to the aims and objectives set out in this Plan. In order to gain maximum benefit from bridge infrastructure, it should be made available for as many users as possible.

Policies AL3 to AL14

All of these Policies require opportunities for the provision of green infrastructure with links to the wider countryside to be explored, and these are welcomed and supported. Creating new routes and links is especially important on the Coastal Plain, where an off-road multi-use path network would be of great benefit to all NMUs.

The West Sussex Rights of Way Management Plan 2018-2028 has Objectives (page 3) which include:

2. *Improve path links to provide circular routes and links between communities.*
3. *Improve the PRoW network to create safe routes for both leisure and utility journeys, by minimising the need to use and cross busy roads.*
4. *Provide a PRoW network that enables appropriate access with minimal barriers for as many people as possible.*
5. *Promote countryside access to all sections of the community enabling people to confidently and responsibly use and enjoy the countryside.*

The Plan also states in Improvement schemes (page 13), that *“A starting point for new schemes will be to consider who could benefit from a new route, such as walkers, cyclists, horse riders and the disabled, and be as inclusive as possible, often the aim will be to achieve at least bridleway status.*”

Policy DM32 Green Infrastructure (page 199)

It is disappointing that the wording (on page 197/198) omits to mention that prows (footpaths, bridleways, byways), are defined by Natural England, and also recognised nationally, as multifunctional ‘green corridors’, and are therefore part of GI. Providing a multi-use (walker, cyclist, equestrian) prows or recreational route around the periphery would comply with NPPF, para 98, as mentioned above. It is good to see public rights of way, and bridleways mentioned in **Point 4** of the Policy, although the wording *“do not lead to the dissection of the linear network”* appears to be rather negative, much better to tell someone what they should do *“The proposals protect, and contribute to the improvement of ……….”*

Policy DM34: Open Space, Sport and Recreation (page 204)

We support the aim to *“seek to retain, enhance, improve access and increase the quantity and quality of...rights of way including improvement of links to them.”* This will be of great benefit to all NMUs.

Point 1 – Excellent to see requirement for development to contribute to new links to the existing rights of way network, which should be multi-use wherever possible.

Also support the aim to secure on-site provision secured via S106 agreements to provide (amongst other things) links to the existing rights of way network to meet any identified shortfalls in the local area, and would request in line with the WS RoW Management Plan that these links will be *“as inclusive as possible, often the aim will be to achieve at least bridleway status.”*

Yours faithfully
Tricia Butcher
County Access & Bridleways Officer (West Sussex)