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Dear Sir/Madam,

I attach the Society's statement for deadline 4.

Yours faithfully,

Mark Weston  
Director of Access  
The British Horse Society

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Director of Access

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## The Planning Act 2008

### Application by Highways England for an Order Granting Development Consent for the A303 Sparkford to Ilchester Dualling

#### Statement of The British Horse Society

The British Horse Society is keen to see that all routes that are being provided for NMUs provide for horse riders as well as walkers and cyclists.

This is in accordance with **Highways England Accessibility Strategy** which states:

*‘An accessible, inclusive and integrated network is a key part of delivering an effective transport system. Our ambition is to enhance accessibility to and across the network for users and communities, as set out in the Highways England Delivery Plan.*

*Our vision focuses on supporting our road users’ journeys, pedestrians, cyclists, equestrians, those with disabilities (such as users with mobility or sensory impairments) and other vulnerable users – while delivering longer-term benefits for communities and users alike.*

*We want to address the barriers our roads can sometimes create, help expand people’s travel choices, enhance and improve network facilities, and make everyday journeys as easy as possible.*

*This will be achieved by ensuring our network supports and contributes to accessible, inclusive and integrated journeys which are safe, secure, comfortable and attractive.*

*We are supporting all users of our network, including drivers and their passengers, pedestrians, cyclists, equestrians, and other vulnerable users. Our focus is also on the communities we affect.*

*Our Accessibility Strategy will be responsive to input from our key stakeholders and represents a real opportunity to build effective partnerships. To do this we will seek to work with:*

***All users of our network***, and the local communities through which it runs, to develop accessibility measures which meet the needs of people driving, walking, cycling and riding on, along or across the network.’

There are 2.7 million regular horse riders in the UK with a significant growth in the number of riders aged between 16 and 24, rising from 368,000 in 2011 to 403,000 in 2015. Equestrians, alongside walkers and cyclists, are vulnerable road users. This is acknowledged in rule 204 of the Highway

Code which states that the most vulnerable road users are pedestrians, cyclists, motorcyclists and horse riders.

Equestrians desperately need safe off road places to ride and drive their horses; as well as greater provision for their safety when they have to ride on the road, with the ever increasing volume and speed of motorised traffic. The latest available NHS Hospital episode statistics show that there was 3641 'animal rider or occupant animal drawn vehicle injured in transport accident'.

In the past six years the Society's records show that there have been 2900 reports of road incidents involving horses, resulting in 39 rider deaths, and 230 horse deaths.

Many rights of way are now disconnected from each other because the roads that should connect them are no longer safe for equestrians to use because of the speed and volume of motorised traffic on them. This leaves many equestrians without a safe local route to use. In England horse riders have access to only 22% of public rights of way and horse-drawn carriage vehicle drivers to only 5%.

The horse industry is worth £4.3 billion to the economy, and in order for this to continue to grow equestrians need safe places to ride and carriage drive.

#### **The British Horse Society's Representations:**

##### **Representation reference number 6.1**

The British Horse Society is keen to see that all routes that are being provided for NMUs provide for horse riders as well as walkers and cyclists.

##### **Highways England's response:**

*'New non-motorised user (NMU) facilities are generally proposed where required to mitigate for the severance of an existing route by the proposed scheme. These severed routes may be legal rights of way (public footpaths or bridleways) or other routes that groups such as the British Horse Society have identified during previous consultation events (such as the network of lanes and local roads either side of the existing A303).*

*The status of proposed NMU facilities reflects the status or use of the severed route, in order to ensure continuity of use by each group of NMU.*

*A total of 8.5 kilometres of new NMU routes are proposed on the scheme. Of these, 6.8 kilometres (80%) will be designated as bridleway status, allowing equestrians to use them. Of the remaining 1.7 kilometres, 1.5 kilometres are footways (reflecting the fact that current routes either side are only footways / footpaths) and 0.2 kilometres are shared use footway / cycleways. These footways / cycleways provide an off carriageway route around Hazlegrove Roundabout between the A359 Sparkford High Street and Camel Hill Link. Equestrians are excluded from this facility due to the likely limited use and difficulty they may experience crossing the A359 (south) arm of the Hazlegrove Roundabout.'*

Highway England's response is welcomed, but the Society would maintain that 'likely limited use' should not exclude horse riders, because to do so means that horse riders who want to use this facility will have to do so on the carriageway which obviously will be less safe.

**On 05/11/2018 Minister for Transport Jesse Norman MP said “*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*”.**

It is therefore equally important that development provides safe routes for horse riders and not just walkers and cyclists.

The proposed 6.8 kilometres of designated bridleways will be a welcome addition to the equestrian network in the area.

#### **Representation reference number 6.2**

In respect of the eastern end of Slate Lane; the exit here from Slate Lane needs some furniture to warn users of the exit, one option would be to provide staggered post and rail fencing with signs on the road verge warning of horse riders and cyclists coming in from the side, or a large silhouette of a ridden horse and cyclist painted on the tarmac.

Highways England’s acknowledgement that measures are needed to address this is welcomed.

#### **Representation reference number 6.3**

Going eastwards from the eastern end of Slate Lane

The provision of a bridleway here would be beneficial. There are horses at Camel Hill and it would give them instant access to Slate Lane and the safe off road riding routes being dedicated as part of the road improvement scheme.

A demand for this route has now been identified and the Society maintains that consideration for this should be given.

#### **Representation reference number 6.4**

The Sparkford roundabout:

Improvements are required to the crossing of the road to Queen Camel (A359) with cutting back of the vegetation to improve sight lines, and the cutting of a channel in the central reservation/pavement to help cyclists and buggies and remove what might be a trip step for horses.

Also the provision of a Pegasus crossing, if justified by the expected traffic flow.

The NMU route in the verge needs to be two-way and 4 meters wide.

The Society does not believe that the contention that the scheme should not include a bridleway crossing of the A359 (south) arm of the Sparkford Roundabout because it is considered that geometric constraints at this location could not be easily overcome to provide safe crossing facilities for equestrians is a valid one, and asks that the Inspector looks at this again. The Society would ask how are equestrians meant to cross here if a safe facility is not provided.

#### **Representation reference number 6.5**

Plowage Lane, southern side of carriageway

It is understood that the northern end of Plowage Lane will be stopped up preventing access onto the new carriageways. There is a restricted byway (Y27/27) which joins Plowage Lane just to the south of this junction. Horse riders and cyclists will need to cross the old A303 carriageway to turn eastward to the new Steart Hill bridge. A Pegasus crossing would be required here if the predicted traffic rate supports this.

The Society welcomes the provision of an informal crossing here and notes that the traffic flows at present mean that a Pegasus crossing is considered not to be required due to the low traffic volumes that are likely to be using the former A303 carriageway . The Society asks the Inspector to consider whether a Pegasus crossing should be provided to ensure that the scheme is future proofed.

22 February 2019

Mark Weston

Director of Access

The British Horse Society