



Application by National Highways for an Order Granting Development Consent for the A428 Black Cat to Caxton Gibbet Project

Submission of additional information by the British Horse Society (BHS) to inform the Planning Inspector as requested

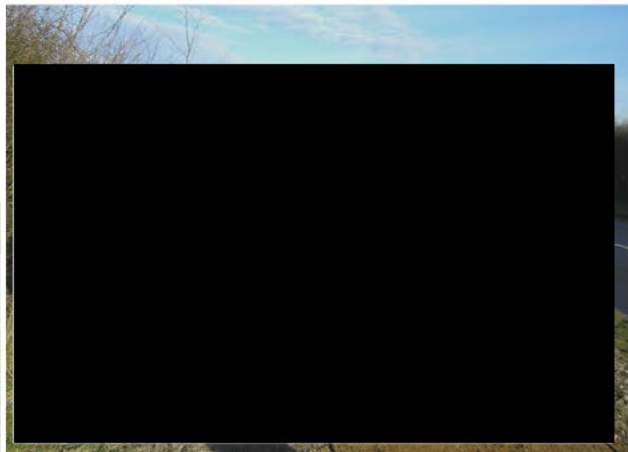
1. Inclusion of equestrians on all NMU paths

The Ministerial Statements, referred to below and delivered over a number of years, demonstrate the intention that LCWIPs and other projects to improve modal shift are also intended to include for equestrians. These are supported by local policies.

The Cambridgeshire and Peterborough Combined Authority Local Transport Plan defines Active travel as walking, cycling and horse riding. [REDACTED]

The Cambridgeshire Rights of Way Improvement Plan SOA A5 Filling in the Gaps – Guiding Principle G5:

‘Prioritise bridleway improvements on grounds that bridleway users currently suffer highest risk on roads and bridleway network is currently most disjointed.’



And at SOA2: A safer and health-enhancing activity

Guiding principle GP2 specifically states

2/1 : Improve future road development including A1, A428, A14

CCC Working with Highways England to plan better ROW provision

[REDACTED]
[REDACTED]

If a safe, segregated pedestrian / cycle provision is included but full NMU access is not provided, horses will be forced to use the carriageway which is unsafe in itself, but with the potential danger of fast moving cyclists on their inside, as well as cars and lorries on their outside, which Alan Hiscox's statement below 'should not be planned'.

Email from Alan Hiscox, Director of Safety, British Horse Society

Regarding the danger of cyclists passing horses on their inside:

From: Alan Hiscox [REDACTED]
Sent: 09 December 2021 11:25
To: Lynda Warth [REDACTED]
Subject: Safety Advice - Horses being passed on the Nearside.

Dear Lynda,

You have asked me for my advice regarding cycle tracks/paths alongside the highway and ridden horses having to use the highway with cyclists either passing them (from either direction) on the nearside and vehicles passing them on their offside.

I think the risk to horse riders having cyclists pass them on the nearside and vehicles pass them on the offside is **very high and is a significant safety issue**.

A cyclist suddenly appearing on the nearside of the ridden horse has the **very real potential**, (even for a well trained horse), to cause the horse to move the other way into the path of a vehicle on the road. **This arrangement should never be planned.**

I am very happy to answer further questions or concerns regarding this issue.

Kind regards,

Alan Hiscox.

Alan Hiscox
Director of Safety

The British Horse Society

Abbey Park, Stareton,
Warwickshire CV8 2XZ

Telephone: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

Website: [REDACTED]

At every level, National and local Cambridgeshire, policies call for the improved provision of safe access for all NMU's through transport projects. This principle should be applied to every opportunity throughout this scheme. Ann Kennedy, has submitted information, on behalf of the British Horse Society, for Bedfordshire, and a copy of their relevant local policies is attached below.

2. Bridleway Facilities Provided within the A14 Scheme

As requested by the Inspector at the A428 Planning Inquiry hearing on Wednesday, 1st December, the BHS is pleased to submit photographs of the roadside bridleway facilities which have been provided alongside the detrunked A14 now known as the A1307. This information is being provided to demonstrate that a de trunked road (which the existing A428 to St. Neots will become) can provide an excellent safe, off road facility for all NMU's for both modal shift and leisure purposes.

Whilst these photographs show what has been achieved, the 'missed opportunities' must also be noted and used as 'lessons learned'. It is essential that all proposed NMU routes are linked to secure the network. Cambridgeshire County Council Asset Information Department have highlighted a number of gaps in the scheme which could easily be connected e.g. the roadside NMU has a 600 metre gap between the Eltisley North Roundabout and the Caxton Gibbet North roundabouts. Such omissions render the whole route useless.

Photo: Swavesey-Fen Drayton A1307



A great example of good provision - this length of bridleway between Cambridge Road (Fen Drayton) which almost reaches to Scotland Drove Public Bridleway (Swavesey) is set back from the A1307 (70mph dual carriageway), screened by an old established hedge, with a substantial width of soft vegetative surface alongside the (approx. 3m) tarmac route. Once settled, the soft surface should be good enough to walk/ride a horse/off road cycle on. The tarmac used by the contractors appears to have a 'rubberyness' to it and seems grippy (tested with shod and barefoot horses just post construction).

Photo: Swavesey-Fen Drayton 13072 –



Stretch of bridleway between (just short of) Scotland Drove public bridleway (see the hedge in far distance which runs parallel to Scotland Drove going off to the left) and the Cambridge Services multi-roundabout junction. This path runs around the perimeter of Cambridge Services roundabout. Width approx. 4m. Again, a vast expanse of soft vegetative surface for most of its length on the inside (away from the traffic) which over time should be good enough to walk/ride a horse/off road cycle on. Same tarmac as above.

Photo: A1307 roadside NMU path



The stretch between Lolworth junction looking towards Herbies Diner/Cambridge Services. The tall fence on the right is a sound-screen as there are 8 houses behind it. There is now an armco running along base of that fence (this photo was taken some months ago when constructors were still on site - all their temporary furniture has now been removed).

Photo: Lolworth road bridge over A14 and A1307



The new road bridge crossing at Lolworth junction. All the new road bridges (Conington, Hilton, Dry Drayton and this one) feature this width (approx. 3-4m) of roadside path, same tarmac as above, signed for horse riders as well as cyclists and walkers, even though two of these bridges dovetail into public footpaths (roadside) at their bases. It is annoying / frustrating and a **missed opportunity** that the Conington-Fenstanton cross-field public footpath was rerouted to be roadside but the orders drawn up between CCC and HE keep it as footpath when this type of lovely new provision, inclusive of horse riders, connects directly into it at base of bridge on both sides.

Photo: Girton bridleway bridge



Ex farm accommodation bridge which HE contractors refurbished to bridleway standards. Unfortunately CCC have not designated it as bridleway so it remains footpath only use, meaning horseriders / cyclists can legally ride almost the length of the A1307 roadside "bridleway" and then have to stop and look longingly towards Huntingdon Road Cambridge (far side of bridge) but are unable to get there – **another missed opportunity**.

Photo: Public bridleway Oakington towards Girton



A new single track "road" giving the home / landowners alongside north side of A14 access to and from their property. It has wide soft vegetative verges both sides and the tarmac is as above. It is well set back from and fenced from both the A1307 and A14 (to right in this photo).

Photo: Swavybridg1 shows the Swavesey NMU bridge.



Photo: Mounting Block



Shows the roadside mounting blocks (which had to be provided to enable horses to be lead across the bridge after a miscommunication in the design – it should have been designed to DMRB standards to allow horses to be ridden across this bridge).

Photo: A1307 Fen Drayton



Horses using the roadside bridleway.

3. Caxton Gibbet – additional information regarding status of Papworth to Caxton path A1198 Ermine Street to support the call for a full NMU crossing of this junction

The original proposals for the A428 scheme included a safe, segregated route for all NMU's. This provision suddenly disappeared from the plans. Despite urgent calls for its reinstatement by horse riders, cyclists, pedestrians, Cambridgeshire County Council, this provision is not included in the current DCO submission. It is essential that this provision is included within any approval.

One of the reasons given for excluding equestrians from any provision within the junction scheme was that there are no equestrian links since the path currently being constructed from Papworth to Caxton was a shared cycle / pedestrian only path. This is no longer the case.

Confirmation email that the route from Papworth to Caxton Gibbet is to be a full NMU including equestrians:

From: [REDACTED] <[REDACTED]>

Sent: 15 October 2021 17:25

To: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Subject: RE: Papworth to Caxton NMU path

Dear [REDACTED],

Thank you for your e mail of 26/09/2021 to the Highways Asset Management team which has been passed to me for reply. Apologies for the slight delay in responding but I wanted to check the design.

I can confirm that the new NMU route will be signed to permit use by pedestrians, cyclists and horse riders. The scheme has been challenging due to limited highway width and budgetary constraints. As part of the process to achieve a scheme that could be delivered within the available budget the width had to be carefully considered. Currently the route is

overall 3m wide. It is planned that an edge line will be marked 0.5m from the new kerb line to act as a buffer, given the nature of the A1198 Ermine Street South. Unfortunately there is not enough width within the existing verge to provide a separate horse route with a grass surface. I recognise that in the absence of a separate horse route it would be preferable to widen the final surface. I have received a cost estimate to widen by 0.5m to provide a 3m wide surface with a 0.5m buffer adjacent to the carriageway. The cost estimate is currently being assessed by CCC colleagues. Clearly I have to retain some contingency for construction risk but if on balance the 0.5m extra can be achieved that would be my preference. You will appreciate that as this is a route alongside the A1198 Ermin Street South the surface of the route will be asphalt.

We are also looking to provide temporary measures to continue the route from the Iway Inn Hotel to the Caxton Gibbet roundabout. You will appreciate that this section is within the area impacted by the National Highways A428 scheme and so a permanent route will be provided by the National Highways scheme. The design for the temporary measures is being prepared; again these will be for pedestrians, cyclists and horse riders but will only be implemented if again the budget is available at the time we would need to order the work.

Kind regards

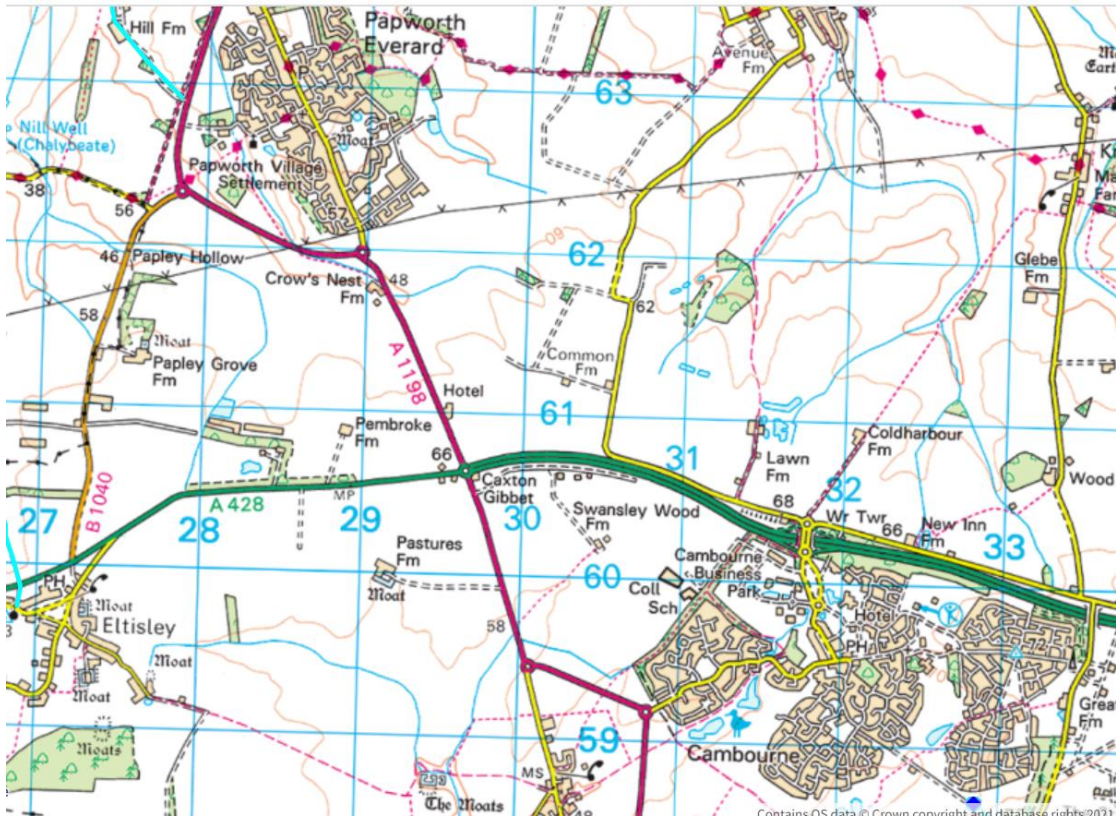
■

The information in this email could be confidential and legally privileged. It is intended solely for the addressee and they will decide who to share this email with (if appropriate). If you receive this email by mistake please notify the sender and delete it immediately. Opinions expressed are those of the individual and do not necessarily represent the opinion of Cambridgeshire County Council. All sent and received email from Cambridgeshire County Council is automatically scanned for the presence of computer viruses and security issues. Any personal data will be processed in line with the Data Protection legislation, further details at ■ Visit ■

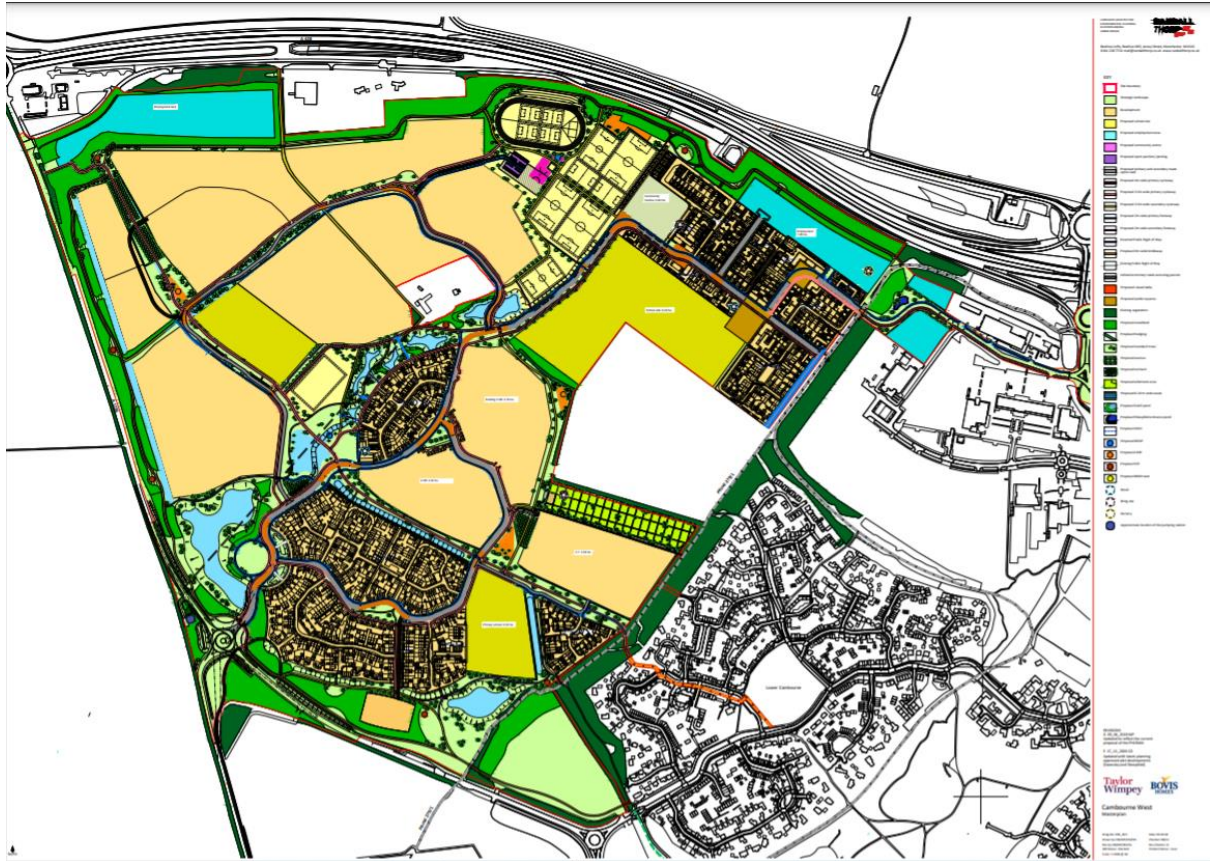
The housing development Cambourne West (Swansley Wood Farm area), includes an extension to the much used Cambourne peripheral bridleway which will encircle the new development and link back to the northern and southern sections of the Cambourne bridleway. The Bourn Airfield development east of Cambourne includes the same facilities along with links to the existing rights of way network. Safe crossing of the A428 to the new multiuser path from the A1198 Ermine Street, Papworth for NMU's is an essential part of this whole network.

The post pandemic world, the need for modal shift, the increase in leisure time, the reduction in commuter traffic, all demonstrate the importance of NMU access provision.

The paucity of bridleway provision from Papworth into the existing and future network, can be seen in this map. Safe crossing of the new Caxton Gibbet intersection would therefore create an important link and its provision should be reinstated as was originally agreed.



Map of Proposed Access Cambourne West showing the peripheral bridleway network which needs to link up to the NMU path to Papworth via a new, safe full NMU crossing at Caxton Gibbet.



Further support for a full NMU crossing is highlighted by the British Horse Society Director of Access in the email referred to above. If a safe, segregated NMU crossing is not provided, horses will be forced to use the carriageway which unsafe in itself, but with the potential danger of fast moving cyclists on their inside which Alan Hiscox's statement clearly states 'should not be planned'.

4. Ministerial Statements regarding the inclusion of horse riders in Active Travel and Local Cycling and Walking Schemes.

Richard Benyon MP, Minister for Natural Environment and Fisheries [wrote to Anne Main MP](#) in June 2011 concerning Alban Way, questioning why horse riders are not permitted to use it.

He urged all local authorities to allow horse riders to use cycle trails, routes and any other ways where it is in their power to do so, and to encourage that permission or dedication to happen where it is not in their power. In the Government's view,

"Unless there are good and specific reasons not to expressly allow horse riders to use such routes, local authorities should take steps to accommodate them. Local authorities should be making the most of their off-road networks through integration of use. 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 that,

"Horsersiders 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."

Cycling and Walking Investment Strategy Safety Review

The government's [Cycling and Walking Investment Strategy Safety Review](#) says:

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.¹ 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, p 4)

Jesse Norman in [House of Commons debate on Road Safety, 5 November 2018](#):

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. (end of this section before Sarah Wollaston)

And final point by Jesse Norman in debate:

Horse riders are vulnerable road users—there is no doubt about that, and there never has been—and they have been included in the work we are doing.

Cycling and Walking, Question asked by Dr David Drew (Stroud)

To ask the Secretary of State for Transport, whether he plans to include (a) horse-riding and (b) horse-drawn carriages in his Department's support for the development of active travel and local walking and cycling infrastructure plans. (HC Daily Report, 15.07.2019)

Answered by Michael Ellis

The Government's Local Cycling and Walking Infrastructure Plan Guidance notes that local authorities should consider the needs of equestrians where they have access to walking and cycling infrastructure such as off-carriageway routes. However, the Government does not intend to specify that all measures to support active travel must include a horse-riding or horse drawn carriage element: decisions on this are a matter for local authorities. Nevertheless the Government does encourage local authorities to support equestrians in their active travel plans.

Active Travel debate Westminster 9 July 2019

The Active Travel and local walking and cycling infrastructure plans debate that took place in Westminster Hall on 9 July 2019, contained the following statements in respect of equestrian access:

The Minister of State, Department for Transport (Michael Ellis)

I congratulate my hon. Friend the Member for Witney (Robert Courts) on securing this popular debate about active travel, local walking and cycling infrastructure. I am delighted to have had the opportunity to hear the contributions of hon. Members from across the House, who spoke about how cycling improves productivity, health and even one's love life, according to the hon. Member for Totnes (Dr Wollaston). I need to do more cycling for all those reasons, all of which are acknowledged. I was also pleased that my hon. Friend and the hon. Member for Stroud (Dr Drew) mentioned equestrianism. Active travel includes horse riders and bridle paths—this debate includes them.

Robert Courts

I am grateful to my hon. Friend and neighbour for making that point. He is right. Those of us who are lawyers know that expunging a footpath is, rightly, one of the hardest things to do in the law. Footpaths are protected, and I agree that they must remain so when new developments are built, to

ensure that our latticework of footpaths continues to exist. I would extend that to bridleways as well, which similarly have an historical provenance. I ask the House to bear in mind that, although we tend to think of cycling and walking in the context of the strategy I mentioned, horse riders in areas such as mine and my hon. Friend's are also vulnerable, and ought to be thought about in the context of active travel as well.

Dr David Drew (Stroud) (Lab/Co-op)

It is a delight to serve under your chairmanship, Mr Bailey. I congratulate the hon. Member for Witney (Robert Courts) on securing the debate. Let me start by mentioning horse-riding. I have to say this, because my horse-riders have been on to me. Pat Harris of the Mid Cotswolds Tracks and Trails group tells me that there are 2.9 million regular horse riders and half a million carriage users. They do not like being left out of debates about cyclists and pedestrians, because they feel they are an important part of the group of non-motorists.

I congratulate my hon. Friend the Member for Witney (Robert Courts) on securing this popular debate about active travel, local walking and cycling infrastructure. I am delighted to have had the opportunity to hear the contributions of hon. Members from across the House, who spoke about how cycling improves productivity, health and even one's love life, according to the hon. Member for Totnes (Dr Wollaston). I need to do more cycling for all those reasons, all of which are acknowledged. I was also pleased that my hon. Friend and the hon. Member for Stroud (Dr Drew) mentioned equestrianism. Active travel includes horse riders and bridle paths—this debate includes them.

I welcome the contributions from hon. Members during our all too brief debate. I welcome the ideas proposed. As I stated at the outset, the Government are committed to increasing cycling and walking and to making our roads safer for vulnerable users such as cyclists, pedestrians and equestrians. As we start to develop the next phase of the cycling and walking investment strategy, I welcome all ideas for how we can achieve our collective ambition. In my view, there is a cross-party, non-political, collective ambition to make cycling and walking the natural choice for short journeys, or as part of longer journeys, across the country.

Bedford Borough Local Policies

Bedford Borough Local Plan 2030

Policy 91 – Access to the countryside

In considering proposals for development all of the following criteria will apply:

- i. Safeguarding of existing public rights of way and ensuring the existing routes are incorporated into the proposed development or an appropriate diversion is provided.*
- ii. Where diversions to the existing public rights of way are proposed, it should be demonstrated that there are no other alternatives and that the benefits of the development outweigh the harm resulting from the proposed diversion.*
- iii. Development should where possible, provide improvements to the public rights of way network including more river crossings linked to the current Borough of Bedford Rights of Way Improvement Plan.*
- iv. All new routes should be multiuser routes and dedicated as bridleways with a minimum width of 4 metres.*
- v. All new rights of way and gates must be designed to be in compliance with the Disability Discrimination Act or relevant act as amended.*
- vi. Incorporate new routes to extend the existing public rights of way network which are not fragmented by roads, railways and other infrastructure.*

vii. Ensure that all developments are designed to enable safe crossing of roads, railways and other infrastructure from new and existing public rights of way.

viii. Public rights of way should retain their existing surface or an improved surface suitable for all users of the rights of way.

ix. There should be no net loss of public rights of way as a result of any particular development.

New permissive paths are encouraged as they can help to fill in gaps in the public rights of way network.

Rights of Way Improvement Plan 2018 – 2023

5.2 Network Development: Road Severance; equestrian and cycling provision; integration with wider highway infrastructure, public transport and car parks

In the public consultation, users gave numerous requests and ideas for seamless networks of safe off-road routes enabling people of all ages, needs and abilities to walk/ride/cycle safely in and around their village/town, out to neighbouring settlements and into and about the wider countryside. The key issues cited preventing such networks are:

- Road severance
- In some areas limited provision for equestrians and cyclists
- Poor integration with wider highway infrastructure eg lack of pavement/cycle-lane, high kerbs.
- Poor integration with public transport and car parks

Regardless of age, ability and/or experience, the pedestrian, horse-rider, cyclist and horse carriage driver often feel and often are vulnerable to the hazards associated with having to negotiate inconsiderate drivers and their vehicles. Disabled and visually impaired people, people using pushchairs and/or with young children and people supervising groups of children drew attention to their vulnerability when being forced onto roads. When walking/riding along a road, space can be limited with no adequate refuge. In addition, walkers, horse-riders, cyclists and horse carriage drivers highlighted that having to use roads can often reduce the enjoyment of the experience of being outdoors due to motorised traffic noise, pollution and spray. They can also feel anxious and pressurised when motorists feel they are inconveniently holding up traffic. These concerns are reinforced by the requests from equestrians and cyclists for more off-road routes. **Where possible all new routes created will be to a multi user status (such as Bridleways) where there are appropriate linkages of the same status.** Work is needed to effectively integrate PRoW with the wider highway network. This will be achieved through links between the RoWIP and the LTP3 and LDF and subsequent work with new developments. Where a strong need to resolve road severance is identified improvement solutions will vary and depend on available resources. The use of public transport to link with the countryside will increase the usage of the PRoW network especially for many local users and visitors.