



To:

Secretary of State for Transport

By email: transportinfrastructure@dft.gov.uk

1st March 2025

Cambridge South East Transport Study TWAO Application**Submission on behalf of the British Horse Society**

This response is being submitted on behalf of the British Horse Society (BHS), the BHS is the UK's largest equestrian charity with over 124,000 members and represents the country's 3 million regular horse riders. One of our charitable objectives is "to promote and secure the provision, protection and preservation of rights of way and of access for ridden and driven horses over public roads, highways, footpaths, bridleways, carriageways, public paths and other land."

We are keen to see equestrians included within transport projects to ensure equestrians needs are protected and enhanced along with other users.

BACKGROUND TO OUR COMMENTS

Nationally equestrians have the right to access just 22% of the public rights of way network, with substantially less for carriage drivers. Many of these routes are inaccessible or disconnected as a result of increased traffic and/or development / transport projects, it is therefore important that these public rights are protected. Increasing pressure for development of houses and industry is making even fewer of those bridleways and byways available. Ancient 'green lane' bridleways, byways and unsurfaced roads are being tarmacked as access roads or cycle tracks and engulfed by new development spreading into the countryside. Traffic increases with new development or change of use so roads become even less safe for riders and carriage-drivers (equestrians) to use to access any traffic-free routes there may be.

Historically verges have provided a refuge and could, if mown, provide a segregated route. However, riders are also increasingly excluded from verges by creation of foot-cycleways - segregated provision for other vulnerable non-motorised users but equestrians are excluded and forced into the carriageway.

Economic Contribution

According to horse passport figures, Defra (2024) and economic figures, Beta (2023) there are 18,019 passported horses owned by people living in Cambridgeshire, contributing over £96 million p.a. to the economy. This contribution to the economy, with the majority of this expenditure spent locally on feed, bedding, farriers, vets, riding instructors and riding schools, livery diversification opportunities for landowners etc. shows the importance and contribution of equestrians to the local economy.

The racing industry is worth £4.1 billion pa to the economy nationally. It requires a huge workforce with a variety of skills and relies on large numbers of 'work riders' e.g. at Newmarket. The skills required rely on grass roots experience gained from learning to ride and hack out safely.

Social Contribution

In Cambridgeshire, there are amazing equestrian centres who, under the BHS scheme Changing Lives through Horses, work with children and young people who have disengaged from the education system. Using the transformative power of working with horses, combined with a focus on developing key skills they can use throughout their lives, leading to increased confidence and self-esteem, enabling them to reengage with society.

There are also Riding for the Disabled Centres – in fact the local riding school in Sawston is an RDA Centre. RDA is a charity which pioneers the therapeutic use of horses and are leaders in disability sport. Their innovative programmes improve mobility, boost physical health and mental wellbeing, build confidence, and teach new skills for those with life challenges.

Health and Wellbeing

Research undertaken by the University of Brighton and Plumpton College

(<https://www.bhs.org.uk/media/ganngxh/health-benefits-of-riding-in-the-uk-full-report.pdf>) on behalf of The British Horse Society found that:

- More than two thirds (68%) of respondents participated in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimates that such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity.
- A range of evidence indicates the vast majority (90% plus) of horse riders are female and more than a third (37%) of the female riders of respondents were above 45 years of age. Horse riding is especially well placed to play a valuable role in initiatives to encourage increased physical activity amongst women of all ages.
- Amongst the horse riders who took part in the survey, 39% had taken no other form of physical activity in the last four weeks. This highlights the importance of riding to these people, who might otherwise be sedentary.
- Horse riders with a long-standing illness or disability who took part in the survey are able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability.

Road Safety

The BHS actively campaigns to improve road safety by making motorists aware of what to do when they encounter horses on the road (see <https://www.bhs.org.uk/go-riding/riding-out-hacking/riding-on-roads/advice-for-motorists/#dead-slow-vr-360-film> -we recommend taking a few moments to watch the film for an impression of how vulnerable equestrians can be in proximity to cars and lorries. Road Safety is a particular concern to equestrians, who are among the most vulnerable road users (VRUs). 2023 data shows:

- 3,383 road incidents involving horses were reported to The British Horse Society.
- 66 horses have died and 86 have been injured.
- 3 people have died and 94 have been injured because of road incidents.
- 85% of incidents occurred because a vehicle passed by too closely or too quickly.
- In 2023-2024 alone, 2,470 horse riders and carriage drivers in England were admitted to hospital after being injured in transport accidents. (NHS Hospital Episodes Statistics).

Research indicates however that only 1 in 10 incidents is being reported to the BHS.

These figures demonstrate the importance of development, including transport projects, being designed to protect, improve and extend provision and will help to prevent these numbers from increasing in the future. NPPF, Paragraph 105 "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 including National Trails." Ensuring that all vulnerable road users, including equestrians, are contained within such facilities can only improve their effectiveness, the benefits to local people and their value for money.

National Planning Policy Framework

Para 96. Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which:[. ...]

(c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.

Para 98. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: [...]

(b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.

Para 103. Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

Para 105. 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 including National Trails.

LTNI/20 Cycle Infrastructure Design

"Walking, Cycling and Horse Riding Assessment and Review

4.5.10 DMRB also contains guidance on undertaking a Walking, Cycling & Horse-Riding Assessment and Review (WCHAR).¹⁹ This is applicable to trunk roads, it provides a good basis for assessing the needs of all users along and across interurban roads."

Sustrans Paths for Everyone

"We want to see a UK-wide network of traffic-free paths for everyone, connecting cities, towns and countryside, loved by the communities they serve."

Highway Code Rule 215

Along with information on how to pass horse riders and carriage drivers safely, the Code reminds road users that, "Horse riders are often children, so take extra care and remember riders may ride in double file when escorting a young or inexperienced horse or rider."

Conclusion

The above information shows many reasons why it is important to include equestrians within transport plans. Maintaining and enhancing the current network of bridleways and restricted byways throughout the CSET route will create benefit to equestrians, the local communities and the general public.

Cambridge South East Transport Project

The Society does not comment on whether a project should go ahead but on the impact of projects on the equestrian community.

Building on the success of the St. Ives to Cambridge Busway bridleway, this project has been designed as a multiuser transport corridor rather than just a busway. We applaud the GCP for taking this pro-active approach which will benefit not only cyclists but also soft surface users (walkers, dog walkers, joggers, off road cyclists and equestrians). It is likely that the grass route, with its links to the rights of way network, will be seen as the only benefit of the busway for many residents of the villages through which the route passes. The creation of the grass path will also benefit wildlife and the environment.

However, there are a number of contradictory statements concerning equestrian access within the application documents and some queries about safety. Consequently, the Society's only option is to Object until such time as satisfactory clarification is received.

1. Ambiguity about the inclusion of equestrians on the service track / bridleway

There is no mention of equestrian access nor bridleway in the Explanatory Memorandum. The Design and Access statement contains the following, advising that the service track will only be available to pedestrians and cyclists:

Proposed works

The works for the Proposed Development will include:

- A new busway route, approximately 7.3m wide, will connect the Cambridge Biomedical Campus and the new A11 Travel Hub at Babraham. The majority of the Proposed Development will be a dedicated busway route apart from at the northern end of the site, where the busway vehicles will run along Francis Crick Avenue, on a segregated road.
- A new Travel Hub site off the A1307 / A11; and
- A new Service Track (also known as a Maintenance Track) providing pedestrian and cycle connections along the busway route. It will connect the A11 Travel Hub to the existing pedestrian/cyclepath network around the Cambridge Biomedical Campus.

Yet the following items from the TWAO confirm that the bridleway is part of the scheme:

(a)

Article 10 Rights of way over emergency and maintenance access tracks	This article provides that the use by the public of the bridleway that will be provided on the emergency and maintenance access tracks forming part of the works to be authorised by the Order will be subject to the use of the route for emergency and maintenance purposes. This article is included to permit the use of the emergency and maintenance access tracks by the vehicles for which it is provided, notwithstanding the creation of a public right of way over the track. The article has precedent in article 9 of the Cambridgeshire Order but has been adapted to permit the use of accommodation and occupation crossings wherever located, rather than dealing with a specified location.
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(b)

Objective 3 - Improve road safety for all users of the A1307 corridor

- Reduce the number of accidents at identified accident clusters along the corridor.
- Reduce the number of speed related incidents along the corridor.
- Improve the safety of crossing movements for cyclists, pedestrians and equestrians.

(c)

Baseline		Impact assessment			
Receptor	Sensitivity	Impact	Mitigation	Impact magnitude	Residual effect
Walkers, cyclists, horse riders (all groups)	High	Provision of new service track for use by walkers, cyclists, and horse riders.	N/A: None proposed	Moderate	The service track will provide a new segregated route for walkers, cyclists, and horse riders from the Travel Hub to the Cambridge Biomedical Campus and connecting Babraham, Stapleford, Stapleford, and Great Shelford. This new route will encourage a modal shift from car transport to non-motorised modes of transport which will improve people's general health and fitness. It will also provide a safer route for cyclists, in particular, who currently use the highway network, reducing the risk of collisions with cars and other motorised transport. This will be a permanent positive health benefit and a significant effect.
					Moderate beneficial Significant

It is essential that confirmation is received that this project includes a bridleway and specifies where that access is to be provided.

2. Inclusion of equestrians all the way from CBC to the A11

Volume 1 Non Technical Summary

Service track

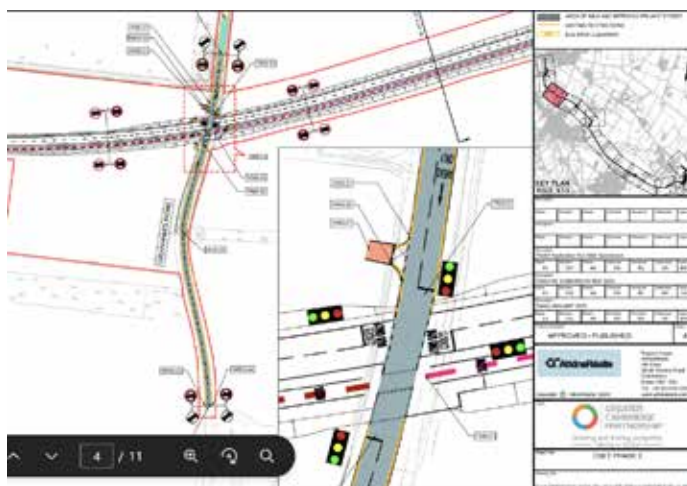
Adjacent to the busway will be the Service Track, providing access along the entire length of the busway for any required maintenance activities and also acting as an emergency refuge for passengers and staff in the event of an incident.

The Service Track will also be able to provide a new segregated route for walkers, cyclists, and for most of the route, horse riders. It is intended to be a public bridleway for the route between the Cambridge Biomedical Campus and the A11 Travel Hub, but created expressly subject to the authority for vehicles connected with the maintenance and safety of the busway to drive on the Service Track.

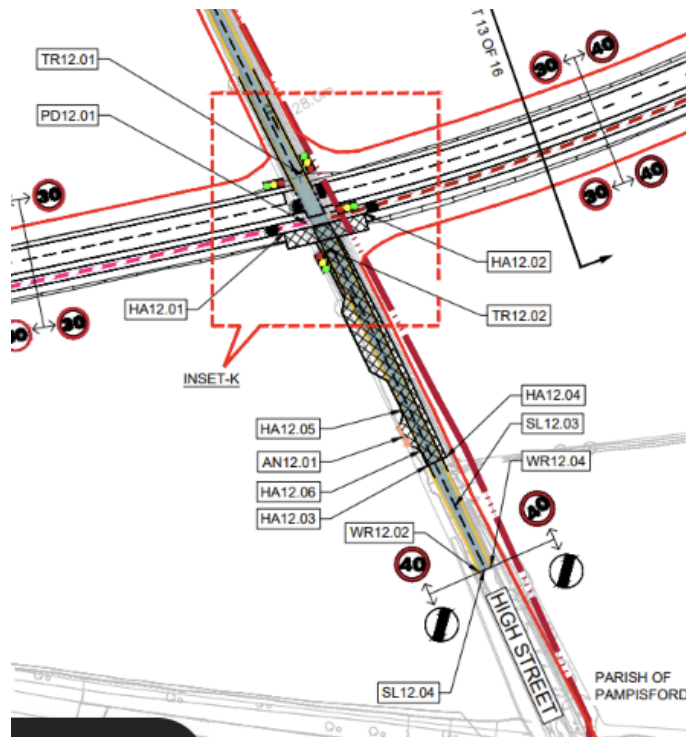
For the majority of the route, the Service Track will be a new facility, but it will merge with and replace the existing DNA Cycle Path (a public cycletrack) where it joins the new busway route from just south of Nine Wells Local Nature Reserve (LNR) and re-joins the existing DNA path at the end of Addenbrooke's Road overbridge.

The above statement confirms that the bridleway will run between CBC and the A11 Travel Hub, however there are drawings that do not correlate with this statement:

Rights of Way & Traffic Regulation Plans - Volume 1



The route between CBC and Granhams Road is coloured with a red dashed line designated as a shared pedestrian and cycle path. The route from Grahams Road is a pink dashed line designated as a bridleway. Clearly it is not acceptable to expel equestrians from a safe off-road path onto a busy road with no safe access. It may be that this route is intended to somehow tie in with the Sawston Greenway but if that is the case, that needs to be clearly defined with appropriate equestrian provision.



The same applies at High Street, Babraham. The bridleway suddenly stops and becomes a shared pedestrian / cycle path. Failure to create equestrian access to the A11 now means that there will never be the opportunity for equestrian inclusive access over the A11 leaving horses and their riders trapped either side of the A11. This is not what was agreed in previous scheme designs. It has only appeared since the removal of the horse box parking facility at the P&R. The Society is concerned that exclusion from access to the A11 is an attempt to exclude equestrians from any new bridge access over the A11. It should be noted that well over 70 horses are liveried at the Land Settlement area of North Road and South Road, Abington. The A11 is currently an impenetrable barrier for all equestrians.

Crossing of the A11 is part of the Linton Greenway – equestrians should benefit equally with other vulnerable road users from publicly funded transport projects.

3. Diversions and Alternative routes for equestrians

Public Rights of Way

13.4.18 There are numerous public rights of way within 500 m of the Site, including footpaths, bridleways, a restricted byway and the DNA Path as shown on Figure 13.3. The following public rights of way directly intersect the Site:

- NCN 11 (DNA Path)
- Bridleway 212 / 2
- Restricted Byway 12 / 0
- Footpath 12 / 9
- Footpath 39 / 47
- Footpath 12 / 4

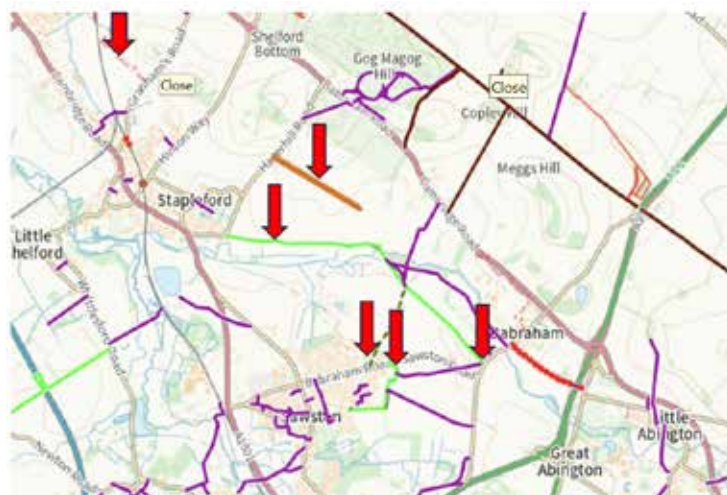
The restricted byway is 12/10 not 12/0.



Bridleway 196/24 Sawston has been omitted.

Walkers, cyclists, horse riders (all groups)	High	Temporary closure of the following public rights of way during construction: • NCN 11 (DNA Path) • Underway 212 / 2 • Restricted Byway 12 / 0 • Footpath 12 / 9 • Footpath 39 / 47 • Footpath 12 / 4 Reduced amenity value for users of the remaining public rights of way network which will remain in use throughout construction.	PH4H	DNA Path diversion	Minor	All public rights of way abutting the Site will be closed for the duration of the construction works. There are no suitable diversions available (see Chapter 14) other than the public highways that will abut the Site (Grantham's Road, Hinton Way, Haverhill Road, Sawston Road / Abraham Road, High Street) resulting in some potentially lengthy increases in journey times and distances. For users of the public rights of way that will remain open but are close to the Site, there will be a reduction in amenity resulting from visual (see Chapter 11) and noise (see Chapter 7) impacts that could potentially deter people from using them and reducing opportunities for active travel. There could also be some displacement of walkers on to the other footpaths that will remain open. This could result in a negative health outcome. Owing to the importance of the NCN 11 (DNA Path) as a commuting route for cyclists and walkers, a temporary diversion will be implemented which will maintain access along this route to Cambridge Biomedical Campus and Cambridge from the communities to the south. There will be a small increase in journey time and distance and a reduction in amenity value, but this will not be significant. This effect could disproportionately impact low-income groups who may be more reliant on non-motorised forms of transport.	Slight adverse. Not significant
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This statement completely ignores equestrians. There is a contradiction between the third and the seventh columns. One states that the paths will be temporarily closed. The other states that the paths will be closed for the duration of the construction with no definition of 'construction'. The project impacts all the equestrian access in the area – the red arrows denote bridleveways and other permitted equestrian access. Closure of the bridleveway network for any length of time is not 'Slight adverse. Not significant'. It is highly significant.



There are no safe options for horse riders other than the bridleveway network (which includes byways and restricted byways). The rights of way cannot be closed for the duration of the construction works without any other safe access being put in place. Owners of the horses at Sawston Riding School use the rights of way network. It is essential for these horses, as it is for all the other privately owned horses, to be able to hack out away from the restrictions of the arena – it is their relaxation time. Some horses training is hacking out. The alternative is that horses are confined to their yards for months on end which will become a welfare and safety issue.

There must be arrangements put in place for alternative access whilst the work is being carried out. It should be a condition of any approval that access to at least one suitably surfaced off road path must be accessible for all equestrians throughout the duration of the works. Temporary access could be required from landowners and arrangements made for closed routes to be available at the weekends and during the summer evenings outside working hours. The application includes access to wide swathes of land, this should be reviewed for opportunities for peripheral temporary access. The temporary use of existing footpaths for equestrian access should be explored.

The BHS, local bridleveway group and the riding school should be consulted on all proposals.

13.8 Summary of significant effects

13.8.1 During construction, significant adverse effects will occur to the following receptors:

- Commercial businesses – due to disrupted access
- Residents of houses in the vicinity of the construction works (all groups) – due to a loss of amenity
- Health and social care services (all groups) – due to access disruptions to the Papworth Royal Hospital and Addenbrooke's Hospital

The vast majority of horse riders are women and girls. If the bridleway network is closed without diversions or alternative routes, there will be significant adverse effects on females – a group with a protected characteristic in terms of Equality.

4. Hobson's Conduit crossing

The permissive bridleway access is not recorded anywhere in the application document:



As a result, equestrians have not been included in the arrangements for links from the new bridleway to that access which leads to other informal access on the ground. This needs to be rectified. Any underpass access could be achieved with mounting blocks so that horse riders can dismount and remount if that is the only option to achieve the access. It is unclear whether the DNA path will form part of the Sawston Greenway or the busway. Whichever it is, equestrians need to be included. Further confusion is the design which includes this statement in the parameter information:

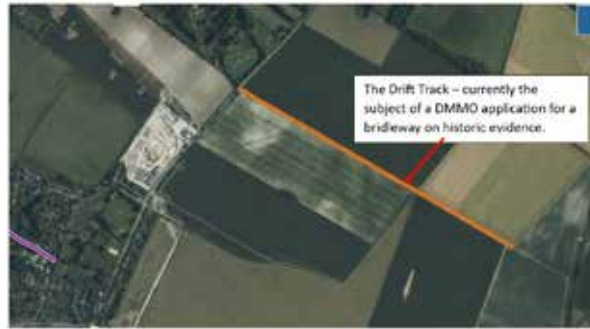
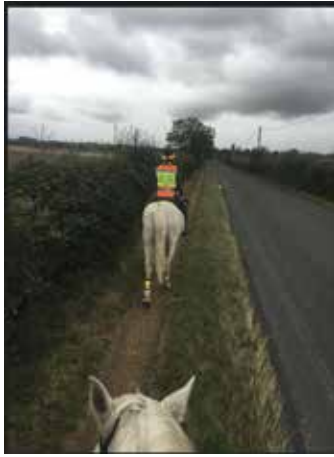
Hobson's Conduit crossing – parameter information:

Span: 15 metres
Width: 14.4m
Height of top of deck above ground level: 3m
Height of equestrian guard rails: 1.8m
Height of pedestrian guard rails: 1.1m
Approach embankment slopes: 1:4 gradient

5. Stapleford

The Rangeford Retirement Home has had a significant negative effect on access safety between the village and the CSETS route. The changes to Haverhill Road mean that some of the infographics in the application are no longer achievable.

The path on the eastern side of Haverhill Road is not a footpath it is an NMU (non-motorised user – pedestrians, cyclists and equestrians) route and has been for many, many years. It is used by equestrians and cyclists as well as pedestrians. It is a safe off road to the path known as the Drift Track. The Drift Track has always been an amenity for the residents of Stapleford. It is not currently on the Definitive Map but there is a DMMO awaiting determination for correction of the status to a public bridleway based on historic evidence. This path attracts many walkers, dog walkers and horse riders. It is essential that there is safe access to this path for all NMU's to protect all highway users.



NMU Path alongside Haverhill Road heading towards Stapleford and the drift track.

The path can be seen above and in the Application D&A photomontage below before it was damaged by the cabling work and Rangeford construction on Haverhill Road and the barriers created by the street lights constructed by Rangefords. The lights are due to be removed but that action has not yet happened. Unless they are moved, it is highly unlikely that even a footpath could be constructed on that section of the highway.



It appears Figure 23 is incorrect in its location – although that could be a misinterpretation of the drawing. Rangeford Development extends beyond the private access indicated in the top right hand corner of the drawing – the same location is circled in both diagrams below. The access proposed in the D&A cannot now be achieved.



The construction of 140 residential units together with the numbers of staff will result in significant increase in the traffic on Haverhill Road. Consequently, NMU access along Haverhill Road is much more dangerous. The original design for CSETS included an off-road path from Stapleford to the A1307 for NMUs. It is to be regretted that this path is no longer included in the project.

The new country park included in the Rangeford Project is to have a brideway link from Haverhill Road to Hinton Way. The access to the country park needs to be for all users because of the increased traffic on Haverhill Road and the loss of the NMU path.

A link has been created from the corner of Gog Magog Way to the busway at the rear of the retirement village. This should be designated as safe access for all NMU's including equestrians. There is a livery yard which borders on to this corner.



1.

2.

1. Red line denotes route of NMU path required must not just be for cyclists and pedestrians but inclusive of equestrians.
2. Shows potential safe off road access to the country park and the Drift Track as included in the Rangeford planning application.

Any link from CSETS to the Country Park should be for all NMU's since these two areas could create a welcome circular route for all soft surface users – walkers, dog walkers, joggers, off road cyclists and equestrians. All new access to the busway planned for cyclists and pedestrians needs to accommodate equestrians as well (that is to the brideway on the maintenance path not to the bus stop itself).

6. Stapleford Bridleway 212/2

There appears to be no information on how the crossing of the bridleway is to be undertaken. What surfacing is proposed. What safety measures are in to be put in place. This, and all other rights of way crossings, will require a Change of Surface Application.

This bridleway is currently the only rural public access path in Stapleford and is very heavily used by all NMU's, particularly in the summer months. It is essential that the surfacing solution is satisfactory for all users, including equestrians.

It is acknowledged that with the busway bridleway (the D&A does not reference the new bridleway) there will be an improvement in the rights of way amenity for the area.

7. River Granta (Stapleford) Crossing

There is no acknowledgement of the bridleway to be created along the bus route although the technical notes include provision for equestrians:

River Granta (Stapleford) crossing – parameter information

Width: 14.4m

Height of top of deck above ground level: 5.1m

Height of equestrian guard rails: 1.8m

Height of pedestrian guard rails: 1.1m

Approach embankment slopes: 1:4 gradient

8. Sawston

The crossing of the restricted byway is at a very enclosed point on the route. There can be significant sudden noise from the industrial site which is adjacent to the byway but hidden behind a hedge. The byway route itself is, as a result of the development, has become narrow, enclosed and at times, not well maintained. From the outset, we enquired about the possibility of some sort of warning signals of approaching buses at this crossing. There is no mention of this within the application.

Figure 39: Section from engineering drawings



There will need to be significant safety measures at this crossing for all byway users. The Restricted Byway is very well used by walkers, dog walkers, joggers, off road cyclists. There should certainly be a safety audit carried out at this point to ensure that all users of the busway corridor and users of the restricted byway are taken into consideration.

It is unfortunate that the route of the byway is not shown on the Sections drawing. Given the high number of crossings likely to take place at this point, dependent on the outcome of the safety review, there could be a case for an additional access path within the pink area of the sections drawing to reduce the number of crossings of the busway on the route of the byway at the existing narrow, enclosed pinch point.



Whilst potentially not within the gift of this project, the opportunity needs to be taken to highlight the need for upgrade of footpath 12/8 Babraham to bridleway since it creates an obvious circular bridleway route and provides safe access for equestrians away from the highway, improving safety for all users. Even if not within the gift of this project, it must be seen as a future upgrade therefore nothing should be

done at the busway crossing of this footpath which would preclude it being upgraded to bridleway status in the future.



9. River Granta Babraham Crossing

It is extremely pleasing to see that this bridge has been designed to accommodate equestrians:

River Granta (Babraham) crossing - parameter information

Width: 14.4m
Height of top of deck above ground level: 5.1m
Height of equestrian guard rails: 1.8m
Height of pedestrian guard rails: 1.1m
Approach embankment slopes: 1:4 gradient

Whilst the parameter information is not consistent with other documents within this TWAO which appear to indicate that equestrian access will not be provided beyond Babraham High Street, it is absolutely essential that this scheme is designed to accommodate equestrians. The reason for this is that any new crossing of the A11 with a bridge must also accommodate equestrians within the transport corridor. Currently, there is no safe access between Babraham and the Abingtons where there is a large and vibrant equestrian community of almost 100 horses. The crossing of the A1307 at Hildersham is the only safe crossing of the A1307 for equestrians – there is no other safe crossing closer to Cambridge. Both the A11 and the A1307 are barriers to linked up safe off-road routes for equestrians.

A new crossing of the A11 has already been mooted on several occasions since the current provision is woefully inadequate for all users – all that is required is the funding and given the drive for better access to Cambridge from the east, especially for those NMU's engaging in active travel modes, (walking cycling and horse riding), funds could be forthcoming. It would be a travesty of justice for equestrians to be excluded from any publicly funded access improvement because they were not included on this last section of CSETS.

This statement was included in the meeting documents of the GCP Joint Assembly 20th February 2025 demonstrating that there are plans for future safe access over the A11. It should be remembered that horses often take no more space than cargo bikes.

Linton Greenway:

- Design work to be progressed for a consultation in 2026 on the proposals for crossing the A11 and the remaining sections east of Linton Village College and from Granta Park to Hildersham.

10. Babraham

As has been mentioned above, it is unacceptable that the bridleway provision stops at High Street, Babraham. That has never been discussed with the BHS – it would have been objected to on the grounds of safety and lack of future connectivity to a new safe crossing of the A11. Equestrians must be included in this section of the route (as per the undertaking given in Volume 1 Non Technical Summary noted above – ‘from CBC to the A11 Travel Hub’).

We would not advocate access for equestrians into the P&R at this stage. The original design included a ‘lollipop’ loop to enable equestrians and other soft surface users, particularly dog walkers, runners, off road cyclists, to return towards Sawston without physically having to turn around and retrace their steps. This is important for equestrians and apparently also for the mindset of dogs whilst being walked – the route continues without turning back on itself which can increase anticipation of ‘home’ for both types of animal making them more excitable. It is understood joggers also find the concept of retracing their steps to be discouraging.

Any future access to a bridge would need to be around the P&R and that should be borne in mind again for all soft surface bridleway users and leisure users of the hardtop path alongside the busway who are using the route to access the crossing over the A11 for leisure purposes. These are all facilities turning a busway into a transport corridor for both utility and leisure purposes benefiting the maximum different users within the community at very little extra cost.

11. Rights of Way Opportunities

It must be acknowledged that the grass bridleway will be the one benefit to the communities along the route for those people for whom the negative impacts of a transport corridor on the countryside is a significant disbenefit. The new right of way will have the opportunity to offer new circular routes with the existing right of way network however, since none of the plans for this application actually show the Rights of Way network, it has to be assumed that no other potential new rights of way creation opportunities have been explored which could further enhance the opportunities to access the countryside, which is an opportunity missed.

Lynda Warth
County Access & Bridleways Officer – Cambridgeshire
British Horse Society

The Impact of Active Travel Plans and LTN 1/20 on Equestrians

Published May 2025

The
British
Horse
Society

Summary

All local highway authorities have to produce a Local Transport Plan in which they set out their plans for active travel. From the outset, Parliament included equestrian travel in active travel and equestrian travel is included in the Active Travel England Route Check User Manual. However, equestrian travel is often being ignored in the implementation of active travel plans by local highway authorities. Local Traffic Note (LTN 1/20) is the primary guidance for local highway authorities, but it is causing significant safety concerns for equestrians as it ignores equestrian travel. Equestrians have to use the road network to access off-road riding routes (byways, bridleways etc.), but measures which are being put in place to improve the safety of cyclists and walkers are compromising the safety and ability of equestrians to access the equestrian off-road network.

Twelve issues of concern are identified: lack of consultation, separation of user groups, path widths, infrastructure, furniture, signage, surfacing, bridge parapet heights, lighting, quiet lane designation, costs, and development within the boundaries of existing highways. How each of these is compromising equestrian safety is discussed. Recommendations are made for improvement.

The Society concludes that revised guidelines are needed for rural/semi-urban/urban fringe locations and that there should be default expectation that all cycle infrastructure must be inclusive of equestrian users unless a clear rationale exists for their exclusion.

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1. Introduction

1.1 Active Travel

All local highway authorities in England have to produce a Local Transport Plan in which they set out their plans for active travel. While some local highway authorities do include equestrians in their active travel plans (for example, the West Sussex Transport Plan 2022-2036; the Cambridgeshire and Peterborough Combined Authority Local Transport and Connectivity Plan) many do not. Since their introduction, it has become apparent that many local highway authorities omit equestrian travel from these plans.

In the absence of a statutory definition in English legislation there is significant misunderstanding over the correct definition of Active Travel by some local highway authorities and the purpose of active travel routes even though it has been made clear that equestrian travel, that is horse riding, is Active Travel. The Active Travel England Route Check User Manual¹, section 10.11 and footnote 4, published in 2024, states:

‘Horse riding is explicitly included in active travel: House of Commons Transport Committee Active travel: increasing levels of walking and cycling in England Eleventh Report of Session 2017–19 Report, together with formal minutes relating to the report (London, 2019): “Active travel covers any journey that is made by physically active means, and covers such diverse activities as horse riding, skateboarding, roller skating, and riding a scooter.” Para 6’

From the outset, horse riding was included in Active Travel by central Government. On 5 November 2018 in a House of Commons debate on Road Safety, Jesse Norman, the Parliamentary Under-Secretary of State for Transport, commented:

“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... 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.”

In 2019, Dr David Drew (MP for Stroud) asked a question:

‘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).

This was answered by Michael Ellis, MP, when Minister of State for Transport:

‘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

¹ <https://assets.publishing.service.gov.uk/media/65e5b5fb7bc329e58db8c1c8/ate-route-check-tool-user-manual.pdf>

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.'

Inclusion of horse riding in Active Travel Plans needs to become the norm if accidents involving horses are to be sustainably reduced on the roads.

1.2 Local Traffic Note (LTN) 1/20

Local Traffic Note (LTN) 1/20 is the Department for Transport's primary guidance note to local authorities in England on the delivery and specification of Active Travel Plans and Local Cycling and Walking Infrastructure Plans (LCWIPs). While the guidance offers good practice for the design of cycle infrastructure, there is limited recognition of equestrians and their requirements. As a result, equestrian use of the highway network and equestrian safety is being compromised, and equestrians are being put in danger on the highway network.

A holistic view is required in order to offer a safe and effective network of routes for all vulnerable road users. This is recognised to some extent in LTN 1/20 paragraph 1.3.1 which states that:

"The guidance should be applied to all changes associated with highway improvements, new highway construction and new or improved cycle facilities, including those on other rights of way such as bridleways and routes within public open space."

However, it needs to be made clearer that this must apply to all vulnerable non-mechanically propelled users, that is, walkers, cyclists, and equestrians.

LTN 1/20 guidance is compromising equestrian use of the highway network and equestrian safety in two ways. Firstly, by not recognising equestrian use of roads which are being adapted for cycling and, secondly, by the integration of public rights of way (PRoW), that is, bridleways & byways, into active travel networks.

Equestrians generally prefer to use PRoW in preference to roads, but most bridleways and byways have to be accessed by using roads. Concerns are being raised by equestrians that the design of new active travel infrastructure deters, or excludes, equestrians thus reducing the network of bridleways and byways available to equestrians. In some examples, denying equestrians to active travel infrastructure, particularly in rural areas, risks pushing horse riders onto the roads where they are at much greater risk of collision with fast-moving motor traffic. Those equestrians who have access to horse box transport are increasingly travelling their horses by road to reach safe places to ride, thus increasing diesel emissions. There is also clear frustration that what were essentially rural routes are being increasingly urbanised, and the distinctive character of these routes changed beyond recognition.

Since November 2010, the Society's records show that there have been 18,683 road incidents involving horses, in which 47 people and 697 horses have lost their lives. A further 1,782 people, and 1625 horses have been injured. While these incidents cannot be attributed to the introduction of active travel schemes, everything possible needs to be done to reduce these distressing figures. Proper consideration of equestrians in LTN 1/20 will help.

This guidance note identifies a number of specific issues within LTN 1/20 and makes recommendations for future guidance in the way it treats routes in the rural/semi-urban/urban fringe locations.

2. The detrimental impact of LTN 1/20 on equestrians: specific issues

2.1 Lack of proper consultation

The Society believes that a significant flaw in LTN 1/20 and its associated scheme review tools is the lack of clear instruction on consultation and inclusion of differing user needs. To properly ascertain demand and utility, it is important that equestrian users should be consulted at an early stage of route development.

Published guidance on the use of Active Travel England's route checking tool² currently sets out that: "you must first answer a question on whether horse riders are expected to use the route." However, it is the Society's experience that this is not being done, possibly because the need is not clearly stated in LTN 1/20.

Additionally, a missing element in the application of LTN 1/20 in rural/ semi-urban/ urban fringe locations is the lack of consideration of the Rights of Way Improvement Plan (RoWIP). Section 60(5) of the Countryside and Rights of Way Act 2000 (CRoW Act) identifies that statutory responsibility for the provision of cycle tracks and other local Public Rights of Way (PRoW) sits within the RoWIP. It is a reasonable expectation that public authorities should take notice of this in development of any cycle networks, in rural/ semi-urban/ urban fringe locations.

The Society believes that the above has led to decisions to exclude equestrian use at an early stage. **The Society recommends for each route identified to improve cycling, an assessment is made whether there is current and potential demand for equestrian use (including horse drawn carriage drivers). Equestrian users should only be excluded from multi-user routes where an overwhelming safety justification exists. Any risk analysis must also consider the risk generated as a consequence of that exclusion.**

² <https://assets.publishing.service.gov.uk/media/65e5b5fb7bc329e58db8c1c8/ate-route-check-tool-user-manual.pdf>

2.2 Separation of user groups

LTN 1/20 states:

“5.6.1: The design speed determines relevant aspects of horizontal and vertical geometry of cycle tracks. The design speeds in Table 5-4 should be used for cycle only tracks and for rural shared use facilities where there are few pedestrians – such routes should be designed as cycle tracks which pedestrians may lawfully use rather than a footway that can be cycled on. Cycle traffic should preferably be separated from pedestrian and equestrian traffic to avoid conflict and allow cyclists to travel at a comfortable speed.”

The result of well-meaning guidance such as this frequently becomes the application of a hard and fast principle. The inclusion of the statement that “Cycle traffic should preferably be separated from pedestrian and equestrian traffic to avoid conflict and allow cyclists to travel at a comfortable speed” has led to a widespread impression that shared use can never be acceptable, or that in choosing to permit shared use, authorities may become liable in the event of an injury. This has also, we believe, in some cases impacted on the choice of furniture and barriers (such as metal A-frames) that restrict equestrian and disabled use (see below).

The most concerning result has been where authorities have deliberately chosen to exclude equestrian users from facilities that could otherwise have provided safe multi-user access including equestrians. Exclusion risks horse riders being forced to continue to use unsafe sections of road, with an overall much higher risk profile from exposure to high-speed motorised traffic, in order to overcome a much lower potential risk resulting from potential conflict with other users.

The Society recommends shared use in rural and many semi-urban fringe areas is the most appropriate type of use and that segregation will not normally be required or represent best value.

2.3 Route Width

LTN 1/20 sets out a number of comments on width, including that for bridges and other paths. Paragraph 6.5.7 identifies a recommended minimum width for shared use routes carrying up to 300 pedestrians per hour of 3.0 metres.

As with other issues, experience has shown that this minimum width guidance has subsequently been interpreted as a mandatory stipulation for funding and/or improvement of routes, which is at odds with some Public Rights of Way (PRoW) provision. As a general rule, no firm width stipulation has been recorded on many historic PRoW yet different user groups share without problems. However, Planning

Inspectorate guidance³ identifies that all new public path orders, definitive map modification orders, definitive map reclassification orders and rail crossing orders should include a width.

Therefore, there are many routes where either the recorded legal width of a bridleway, or the physical extent of a route, is considerably less than the 3.0 metres width identified in LTN 1/20 as necessary. But provision of a 3 metre width has been reported to create a significant challenge where authorities are seeking to negotiate the creation of new routes or upgrading of footpaths for shared use, particularly in rural areas where levels of use may be unlikely to exceed 300 users per week, let alone per hour.

The Society recommends route width should be contextual to the ordinary traffic of the neighbourhood, likely predominant use, and overall context of the location. Where existing routes are repaired or improved there should be flexibility in width criteria to reflect local circumstances. A minimum usable width of 3 metres should only apply to new routes.⁴

2.4 Infrastructure

Chapter 10 of LTN 1/20 Junctions and Crossings makes no reference to equestrians at all, but LTN 1/20 is being applied to rural/semi-urban/urban fringe locations where equestrians need to use the road network. This is putting equestrians in danger as explained by the example in the text box.

The lack of consideration of equestrians in LTN 1/20 is in stark contrast to the detailed guidance given by National Highways in their Design Manual for Roads and Bridges for trunk roads and in the Society's advice notes.

The Society recommends the guidance in LTN 1/20 on junctions and crossings is revised by referring to existing published guidance, or it is made clear that the present guidance relates only to urban locations where equestrians are unlikely to be found.

Case study at Chilton Road, Upton, Oxfordshire.

Lack of provision for horse riders at this signal-controlled crossing puts them in danger. Lengthy representations were made to the project managers by the Society at the design stage when National Cycle Route 544 was being upgraded. The project managers refused to acknowledge the Society's concerns that the design made conditions less safe for horse riders who are now likely to cross when a green signal for motor traffic is displayed because horse riders cannot access the signal control box safely. We believe this is because there was no clear guidance in LTN 1/20 on equestrian provision.

³ <https://www.gov.uk/government/publications/rights-of-way-advice-note-16-widths-on-orders>

⁴ <https://www.bhs.org.uk/media/10al4dva/dimensions-0423.pdf>



Image 1. Chilton Road, Upton, Oxfordshire

See [Oxfordshire road repurposed to put walking, wheeling and cycling first - Sustrans.org.uk](https://www.sustrans.org.uk/oxfordshire-road-repurposed-to-put-walking-wheeling-and-cycling-first)

2.5 Furniture

LTN 1/20 is generally to be commended for its clear messages on the impact of gates, barriers, and other physical furniture on users, particularly on the impact of such furniture on wheelchair and mobility scooter users and users of non-standard cycles (tricycles, recumbents etc.). Significant progress has been made by Sustrans in the removal of these barriers on the National Cycle Network. However, many barriers remain on other routes and at access points to other public open spaces.

One particularly notable issue is that in many urban-fringe and rural locations, concerns exist about access by illegal motorised users, in particular off-road motorbikes (including unregistered cross-country motorbikes and illegal high-power electric motorbikes). In many locations, significant pressure is put on authorities by local elected members and on occasion police crime-reduction officers to include physical barriers restricting motorbike use on both cycle routes and other accessible public open space, even though this has clear detrimental effects on accessibility for a wide range of users.

The installation of furniture such as metal A-frames and K-frames is likely to completely exclude equestrian users (including carriage drivers) from routes. Step-through barriers for horses can be a solution, ensuring continued equestrian use, but care must be exercised to ensure that solutions remain practical. On occasion significant overbuilding and cost implications have been witnessed, sometimes with an impression that the process and inclusion of barriers has become more important than their practical utility and accessibility to users.

Attention is drawn to extensive research work performed by Natural England on the accessibility of self-closing bridle gates ⁵, an important piece of work which helped inform the subsequent updating of British Standard 5709:2018 (Gaps Gates and Stiles)⁶, which specifies field-measurable performance requirements for gaps, gates and stiles used on footpaths and bridleways as well as other routes used by the public. This standard includes an important guiding principle of defaulting to the ‘least restrictive option’ at all times.

The Society considers that it is a significant anomaly that a recognised British Standard exists, and is in regular use, regards the installation of furniture on Public Rights of Way, but is virtually unheard of on the National Cycle Network and other cycle infrastructure. This is an area where greater consistency is needed, and users should be able to expect the same basic principles and standard specifications to apply to all publicly accessible routes.

The Society recommends furniture (including gates and other barriers) on all cycle routes should be compliant with British Standard BS5709:2018 (gaps Gates and Stiles) including the guiding principle of ‘least restrictive’ option.

2.6 Signage

Chapter 13 of LTN 1/20 covers the use of traffic signs, road markings and way marking. The guidance rightly stresses the importance of signs on highways (including public rights of way) complying with Traffic Signs Regulations and General Directions (TSRGD). However, the recommendations on signage ignore the possibility of equestrian use. Paragraph, 6.2.38 comments that:

Signs to TSRGD diagram 955 (preferred) or 957 are required to indicate the presence of the track to all users, and to give effect to the traffic order creating the cycle track – advice on sign placement is given in Chapter 3 of the Traffic Signs Manual. Cycle symbol markings to TSRGD diagram 1057 should be placed at regular intervals along cycle tracks. The cycle symbols should be placed in the direction of the flow of cycle traffic, and therefore in both directions on two-way tracks.

A particular issue which exists here is that of equestrian use in rural/ semi-urban / urban fringe locations. Under TSRGD, diagrams 955, 956 and 957 all indicate that a route is “for use by pedal cycles and pedestrians only” The Schedule 3 general directions applying to the erection of this signage dictates that:

“The sign must only be placed to indicate the effect of an Act, order, regulation, bylaw, resolution or notice which prohibits or restricts the use of the road by traffic.”

⁵ <https://publications.naturalengland.org.uk/publication/4580441024102400>

⁶ <https://www.pittecroft.org/UnderstandingBS5709.pdf>

This suggests that while the intent of erecting these signs is to positively indicate the presence of the route to cyclists and pedestrians, the legal effect of the erection of the signage is in fact to indicate the existence of a legal restriction meaning that only pedestrians and cycles can use the route.

However, equestrians are lawfully permitted to use all areas of the highway⁷ except a footway alongside the carriageway⁸. No general restriction prohibits use of horses on cycle tracks (including both shared use cycle tracks alongside the carriageway and separated cycle tracks). As such, the erection of diagram 955 or 956 - rather than diagram 956.1 - may, in a number of situations, be contrary to the legislative scheme for erection of traffic signage under TSRGD. The Society is concerned that equestrians are being, incorrectly, deterred from using cycle tracks where no legal restriction exists. In addition, the use of signs 955 or 956 risks equestrian users resorting to riding in the carriageway where they are at risk from motor vehicles on their right, whilst also having cyclists pass them on their left, contrary to Highway Code rule 163 which states horses must not be passed on their left.

It should also be noted that Highway Authorities have a specific legal duty⁹ to ensure the provision of:

“adequate grass or other margins as part of the highway in any case where they consider the provision of margins necessary or desirable for the safety or accommodation of ridden horses and driven livestock¹⁰.”

Where is the horse rider to go on this road?

As signed, the horse rider is in a potentially dangerous situation because motor vehicles are passing them on their right with cyclists passing them on their left, that is, the horse rider is sandwiched between two faster moving vehicles.



Image 2. Sign 956.1 must be used to allow horses to use the cycling/ walking path, not sign 956.

⁷ <https://www.bailii.org/ew/cases/EWHC/Admin/2010/269.html> para. 33

⁸ <https://www.legislation.gov.uk/ukpga/Will4/5-6/50/section/72>

⁹ <https://www.legislation.gov.uk/ukpga/1980/66/section/71>

¹⁰ <https://www.legislation.gov.uk/ukpga/1980/66/section/71>



Image 3. Sign 956/1



Image 4. Sign 956

The Society recommends the default position should therefore be that diagram 956.1, rather than 955 or 956, is erected on cycle routes (including roadside verge shared-use facilities) in rural/semi-urban/ urban fringe locations except where a specific restriction (such as a bylaw, PSPO or Traffic Regulation Order) is in place restricting equestrian use of that route.

2.7 Surfacing

The Society accepts that in urban situations a sealed asphalt surface (Tarmac) may be deemed to be the most appropriate surface to use. However, in rural/ semi-urban/urban fringe locations, and especially where PRoW are being incorporated into active travel routes, the Society is seriously concerned about the effect that LTN 1/20 guidance is having on the surfacing of bridleways and byways with asphalt.

Para 1.6.1 of LTN 1/20 identifies that:

“Surfaces must be hard, smooth, level, durable, permeable and safe in all weathers. Surface materials should be easy to maintain, for example asphalt and other materials highlighted in Chapter 15. Materials such as brick and stone should generally be avoided on cycle routes. They are expensive, yet often quickly become dirty, ugly, broken and rough to ride on under the impacts of vehicles and can be slippery in wet weather... Materials such as loose gravel should also be avoided.”

This paragraph is supplemented by comments in Para 8.1.2 that:

“For year-round utility cycling, a sealed surface is necessary (see Figure 8.1), and street lighting should be provided. Where the purpose of the route is primarily for leisure trips, typically in rural areas, these features may be less important. However, loose gravel surfaces can be difficult or inaccessible for people in wheelchairs and some types of adapted cycle.”

Experience has been that, in practice, the application of this guidance has resulted in an impression that sealed surfaces, invariably asphalt, are the only acceptable surfacing options including on bridleways and byways which may be being ‘improved’ for cycling as well as on new and upgraded cycle paths. In addition, an impression is given that external funding will be refused for proposals that utilise any other

surfacing options than asphalt. Indeed, this impression is reinforced in the foreword to LTN 1/20 the following is stated that The Department for Transport will also reserve the right to ask for appropriate funding to be returned for any schemes built in a way which is not consistent with the guidance.

However, the above guidance in LTN 1/20 conflicts with extensive guidance from other public agencies and highway authorities on the issues of surfacing suitable surfaces for horses. The Countryside Agency published its good-practice guidance document CA213 (On the right track: surface requirements for shared use routes)¹¹ in 2005 and this was endorsed by the Society in 2006¹² and updated in 2024¹³. This guidance included research on the 'slipperiness' of various asphalt compounds and the risk to horses caused by inappropriate surfacing.

CA213 "On the right track: surface requirements for shared use routes" ¹⁴ identifies that:

"In general, sealed surfaces are rigid and not preferred by horse-riders and many runners, although they may be appropriate for use on short sections where routes cross vehicular access points. Sealed surfaces can be acceptable where a large grassy verge is available. Asphalt surfaces can be intrinsically slippery or become slippery when wet and covered in decaying vegetation"

And goes on to comment that:

"In rural areas, where horse-riding and carriage driving are likely to be more prevalent, the need for soft surfacings which allow faster speeds should be recognised. Bridleways may be popular with horse-riders because they offer this facility, and changes to surfacing to accommodate other user groups should not jeopardise this use if at all possible."

Additionally, it advises that:

...surfaces which can encourage fast cycling speeds should be avoided for routes with steep gradients and poor forward and peripheral vision, or the surfacing should include chicanes or other features to reduce cycling speeds.

The use of sealed asphalt surfaces has additional negative issues for all user groups. Firstly, in winter months the non-porous nature of the surface can lead to problems with standing water after rain and result in sheet ice which can be exacerbated by the collection and mulching of leaf-litter. Concerns have also been raised over the impact of repeated freeze-thaw cycles causing delamination of asphalt surfaces in the absence of adequate drainage. These issues are accentuated by the lower levels of use, and inevitable reduced levels of maintenance (including lack of gritting, vegetation clearance and drain maintenance) encountered in rural locations.

¹¹ https://www.bhsaccess.org.uk/wiki/uploads/OnTheRightTrack_CoAgSharedUseGPG.pdf

¹² <https://www.bhs.org.uk/media/uctjszb3/horses-and-highways-surfacing-leaflet.pdf>

¹³ <https://www.bhs.org.uk/media/fldid1aq/surfaces-0524.pdf>

¹⁴ https://www.bhsaccess.org.uk/wiki/uploads/OnTheRightTrack_CoAgSharedUseGPG.pdf

Secondly, there are genuine concerns over the urbanising and environmental impact of sealed asphalt surfaces in protected landscapes and other sensitive sites such as heathland and ancient woodland sites, including the likelihood of tarmac having a detrimental effect on nature conservation. Scientific research commissioned by Natural England¹⁵ identifies that:

“...in general terms the conversion of an unsurfaced path to a surfaced path tends to be highly damaging to the invertebrate interest, both in terms of a barrier effect, but also in removing potential nesting and foraging sites for species associated with bare ground. Where surfacing is required due to health and safety considerations or other reasons then aggregate is preferable to tarmac and the choice of aggregate should be appropriate to the site geology.”

Thus, significant consideration should be given to the impact of surfacing, particularly the impact of asphalt surfaces, in order for public authorities to comply with their Section 40 biodiversity duty¹⁶. Guidance produced in 2023 by Paths for All¹⁷, identifies the benefit of self-binding aggregates which can be chosen to create an attractive surface that blends well with the landscape, which they identify as being particularly important in more sensitive heritage and environmental settings.

Thirdly, anecdotal evidence indicates that use of sealed surfaces increases the speed of cyclists on these routes to the detriment of other users. However, so far, little empirical evidence appears to exist on the issue of increased speeds as a direct result of resurfacing, or on the impact of this on other users.

The Society strongly recommends further research needs to be done in this area.

In conclusion, the Society accepts that a higher standard of surfacing may be required where there is a high level of utility cycling such as routes to local facilities (e.g. schools and/or rail stations) and routes linking outlying villages to nearby towns. However, the Society strongly recommends the use of modern rubber-crumb aggregate surfaces such as Flexipave and nu-phalt in preference to asphalt in these locations. These modern hybrid surfaces have been well received by horse riders and other users (including runners) in a number of locations, for example the Britannia Greenway on the outskirts of Bacup in Lancashire¹⁸.

The Society recommends on PRow (bridleways and byways), well-constructed, non-sealed routes using self-binding aggregates provide an accessible, firm, and stable surface that is more suitable for a wider range of users including many wheelchair and mobility scooter users. It is likely to offer a more cost-effective solution than sealed surfaces, particularly where levels of use are lower than in urban areas and where no mechanically propelled use is expected.

¹⁵ <https://publications.naturalengland.org.uk/publication/44006>

¹⁶ <https://www.legislation.gov.uk/ukpga/2006/16/section/40>

¹⁷ <https://www.pathsforall.org.uk/resource/outdoor-accessibility-guidance-download>

¹⁸ <https://www.youtube.com/watch?v=4NMm5LZo0IE>

Case Study - The Mere Way byway in Cambridge: detrimental development

The Mere Way is a rural route (classified as a Byway open to all Traffic) in Cambridgeshire, with vegetation on either side which was already accommodating walkers, cyclists, and horse riders. The route was redeveloped as part of an active travel scheme in 2022 as a result of nearby housing development and the Local Authorities desire to create an active travel route to link to this.

Recommendations from the BHS and other user groups for the creation of a new route were rejected in preference for the redevelopment of the Mere Way.



Image 5. The Mere Way byway, Cambridge - before

Regrettably, the Mere Way has now lost much of its rural nature and heritage as an ancient route. The vegetation has been removed with a consequential significant loss of biodiversity, and a clear change in the character of the route.



Image 6. The Mere Way byway, Cambridge - after

The Society strongly believes that such a drastic change in character, the surface used, the excessive loss of vegetation was inappropriate in this location and should be prevented in similar locations. Whilst repair and improvement of existing rights of way is to be applauded, it must be done in a manner sympathetic to the existing use of such a route and its surrounding environment, without significantly changing the character of the local area.

2.8 Bridge parapet heights

LTN 1/20 states:

“10.8.14: A parapet height of 1.4m is recommended on new overbridges where the cycling surface is immediately adjacent to it (1.8m if equestrians also use the bridge). It should be noted that Highways England now specify a minimum parapet height of 1.5m for new structures on trunk roads. However, the lower 1.4m height is acceptable for cyclists on other roads.”

With regard to guidance on issues such as bridge parapet height or tunnel/overhead restrictions, these can often be overcome simply through signage recommending that horse riders' dismount. Equestrian users are generally pragmatic and would rather see this in place than see their access to the route be restricted. Established BHS guidance exists on these issues ^{19 & 20}.

The Society recommends for those that are below the recommended standard, signage recommending that horse riders dismount should be erected. Equestrians should only ever be excluded from multi-user bridges where an overwhelming safety justification exists, and that any risk analysis must also consider the risk generated by that exclusion.

2.9 Lighting

Para 15.3.2 of LTN 1/20 identifies that:

“It is not expected that routes outside built up areas used primarily for recreation would normally need to be lit except where there were road safety concerns, such as at crossings or where the track is directly alongside the carriageway.”

The Society agrees with this guidance but would take the opportunity to highlight the successful use of photoluminescent studs to mark the edge of some routes, such as the Britannia Greenway in Lancashire, as a successful and low impact solution where required.

The Society recommends routes outside built up areas, used primarily for recreation should not normally require lighting save where it is needed for safety reasons.

2.10 Quiet Lanes Designation

Chapter 7 of LTN 1/20 discusses the use of quiet lanes designation, under the Home Zones and Quiet Lanes (England) Regulations 2006²¹. The guidance discusses that formal designation of routes with fewer than 1000 daily vehicle movements may be appropriate in order to help drivers to anticipate the presence of cyclists, walkers, and equestrians within the carriageway.

¹⁹ BHS Guidance bridges, gradients and steps: <https://www.bhs.org.uk/media/ibxmhotr/bridges-0224.pdf>

²⁰ BHS guidance on width, area and height: <https://www.bhs.org.uk/media/1oal4dva/dimensions-0423.pdf>

²¹ <https://www.legislation.gov.uk/uksi/2006/2082/contents/made>

From an equestrian point of view, the effect of the 2006 regulations appears to have been minimal, and potentially much less impactful on the usability and character of routes than originally expected. One reason for this may potentially be the scarcity of use of speed-orders as an adjunct to quiet lanes designation. The regulations permit authorities to issue a speed order reducing the speed limit on any designated quiet lane route which, otherwise, given the nature of many unrestricted singletrack country lanes, would invariably be the national speed limit.

A further significant reason for the limited effect of the 2006 regulations appears to be that many of the routes which would benefit most from quiet lane designation are used as 'rat runs' by motorised traffic and that formal designation has done little to change this. It is commonly believed that many of these rat-run routes are in fact habitually used by a minority of drivers with an established daily journey (e.g. home-work commute) who elect to bypass known congestion spots. As such, it is possible that steps such as quiet lane designation, traffic calming and removing routes from the sat-nav database will fail to result in the desired behaviour change, as routes are already known to drivers.

This conclusion would appear to be supported by the results of a yearlong trial in Cornwall, titled the Truro Quiet Lanes trial²², which restricted through-use of over 10 miles of country lanes in rural Cornwall. The trial concluded that legal restrictions alone had failed to deliver a material shift in the behaviour of motorists using those roads.

The Society recommends combining the designation of quiet lanes with both speed limit reductions to a maximum of 20mph and the partial closure of designated routes to through-use by motorised traffic (including filtered permeability through the erection of physical barriers) is likely to offer the most cost-effective and practical solution to increasing safety and reducing traffic on many minor roads/quiet lanes.

2.11 Cost of Active Travel Schemes

The Society has serious concerns over the financial impact of the significantly raised standards specified in LTN 1/20 on already strained local and national budgets and believes these standards to be unsustainable considering the challenges facing the public purse.

The budgets involved in development of routes to LTN 1/20 standards frequently dwarf that allocated to PRoW creation or maintenance. For example, the redevelopment and improvement of an approximately 4.5 mile cycle route from Keswick to Threlkeld in the Lake District National Park in the aftermath of Storm Desmond attracted a capital budget in the region of £7.9 million (£1.7 million per mile)²³ and with a deliberate decision to exclude equestrian users. Similarly, the development of the 'Saints Trails' in

²² <https://letstalk.cornwall.gov.uk/truro-quiet-lanes>

²³ <https://www.gov.uk/government/news/full-steam-ahead-for-keswick-to-threlkeld-railway-path>

Cornwall, a project part-funded by National Highways designated funds and open to cyclists, walkers and equestrians attracted some £11 million in external funding²⁴ for a planned creation of nineteen miles of new routes (approx. £0.5 million per mile).

By way of comparison, the recent Coast to Coast National Trail upgrade project has an estimated budget of £5.6 million for trail improvements across the length of a 197 mile route (£28,5000 per mile), including the creation of approximately eighteen miles of new public rights of way (nine miles of footpath and nine miles of bridleway).

The Society recommends a more flexible funding formula to allow schemes to deliver benefits over a much wider scale/overall distance than can be achieved within the current LTN 1/20 framework. In the rural context, the delivery of a continuous traffic free route - even if delivered to a lower standard (which could potentially be improved in the future) - is strongly preferable to the delivery of a shorter or non-continuous route completed to a higher standard.

2.12 Development within the boundaries of existing Highways

One reason for the high cost of cycle infrastructure is an over reliance on development within the margins of the existing highway network. Cycle routes constructed alongside or within the carriageway - which may require new dropped pavements, installation of traffic lights and/or resurfacing of existing carriageway or footway features - all result in rapidly increasing costs. Costs could often be significantly reduced through the creation of new public rights of way further away from the existing highway network.

In addition, costs incurred through compulsory purchase for creation of routes under the road/cycle track regime could often be decreased through the utilisation of PRow creation order powers which, as a result of S28 Highways act 1980, incur only the costs of compensation for loss in value rather than the full cost of compulsory purchase. In many cases, this cost may be significantly lower than the costs and disruption incurred as a result of carriageway works.

Many users have expressed a preference for routes that travel parallel to existing roads but 'on the other side of the hedge/fence' in order to give a greater distancing from traffic and enhance the 'natural' feeling of routes. The Society considers that these routes are likely to be both safer and more attractive to equestrians, as well as cyclists and walkers, than routes within the existing highway boundary.

Furthermore, the creation of new routes outside the existing highway boundary often offers significant opportunities for enhancement of biodiversity through tree/hedgerow planting and enhancement of routes for floral and invertebrate conservation, plus associated health and wellbeing benefits to users from increased exposure to, and connection with, nature.

²⁴ <https://nationalhighways.co.uk/article/saints-alive-cyclists-hit-the-trail-across-cornwall-thanks-to-national-highways-funding/>

The Society recommends consideration should be given to the creation of new routes through highway creation powers in preference to the adoption/alteration of popular equestrian routes, and consideration of the provision of routes that travel parallel to existing roads but on the other side of the hedge/fence to give a greater feeling of safety due to greater distancing from traffic.

3. General conclusions and recommendations

LTN 1/20 has a number of serious weaknesses in its lack of consideration of equestrian users and its wider applicability to rural /semi-rural/urban fringe locations. These weaknesses are compromising equestrian safety and deterring equestrians from using roads and the public rights of way network. In places, LTN 1/20 ignores previous guidance, for example, the British Standard BS 5709:2018, the Countryside Agency's CA213 (*On the right track: surface requirements for shared use routes*), National Highway's Design Manual for Roads and Bridges plus the Society's advice notes.

The Society concludes that new guidance is required for rural/semi-rural/urban fringe locations where there should be default expectation that all cycle infrastructure must be inclusive of equestrian users unless a clear rationale exists for their exclusion. New guidance should clarify the contextual nature of standards of construction and maintenance though reference to the established legal duty of a highway authority to render the highway, *"in such good repair as renders it reasonably passable for the ordinary traffic of the neighbourhood at all seasons of the year without danger caused by its physical condition."* Cycle infrastructure must not result in equestrian exclusion where less restrictive solutions (such as recommending that riders dismount) would suffice.

A number of **detailed recommendations** are made in the text above. These are summarised as follows:

- 1. Consultation:** For each route identified to improve cycling, an assessment is made whether there is current and potential demand for equestrian use (including horse drawn carriages). Equestrian users should only be excluded from multi-user routes where an overwhelming safety justification exists. Any risk analysis must also consider the risk generated as a consequence of that exclusion.
- 2. Segregation of user groups:** Shared use in rural and many semi-urban fringe areas is the most appropriate type of use and that segregation will not normally be required, appropriate, or represent best value.
- 3. Route width** should be contextual to the ordinary traffic of the neighbourhood, likely predominant use, and overall context of the location. Where existing routes are repaired or improved there should be flexibility in width criteria to reflect local circumstances. A minimum usable width of 3 metres should only apply to new routes.

- 4. Infrastructure:** The guidance in LTN 1/20 on junctions and crossings is revised by referring to existing published guidance or it is made clear that the present guidance relates only to urban locations where equestrians are unlikely to be found.
- 5. Furniture:** Furniture (including gates and other barriers) on all cycle routes should be compliant with British Standard BS5709:2018 (gaps Gates and Stiles) including the guiding principle of 'least restrictive option'.
- 6. Signage:** The default position should be that diagram 956.1, rather than 955 or 956, is erected on cycle routes (including roadside verge shared-use facilities) in rural / semi-urban / urban fringe locations, except where a specific restriction (such as a bylaw, PSPO or Traffic Regulation Order) is in place restricting equestrian use of that route.
- 7. Surfacing:** On Public Rights of Way (bridleways and byways), well-constructed, non-sealed surfaces using self-binding aggregates provide an accessible, firm, and stable surface that is more suitable for a wider range of users including many wheelchair and mobility scooter users. It is likely to offer a more cost-effective solution than sealed surfaces, particularly where levels of use are lower than in urban areas and where no mechanically propelled use is expected. The Society recommends that further research is undertaken to ascertain the impact that sealed surfaces have on the speed of cyclists.
- 8. Bridge parapet heights:** For those parapets that are below the recommended standard, signage recommending horse riders dismount should be erected. Equestrians should only ever be excluded from multi-user bridges where an overwhelming safety justification exists, and that any risk analysis must also consider the risk generated by that exclusion.
- 9. Lighting:** Routes outside built up areas used primarily for recreation should not normally require lighting save where it is needed for safety reasons.
- 10. Quiet lanes:** Both speed limit reductions and the partial closure of designated routes to through-use by motorised traffic are needed for the most cost-effective and practical solution to increasing safety and reducing traffic on many minor roads / quiet lanes.
- 11. Cost of Active Travel Schemes:** A more flexible funding formula to allow schemes to deliver benefits over a much wider scale/overall distance than can be achieved within the current LTN 1/20 framework. In the rural context, the delivery of a continuous traffic free route - even if delivered to a lower standard - is strongly preferable to the delivery of a shorter or non-continuous route completed to a higher standard.

12. Development within the boundaries of existing highways: Consideration should be given to the creation of new routes through highway creation powers in preference to the adoption/alteration of popular equestrian routes, and the provision of routes that travel parallel to existing roads but on the other side of the hedge/fence to give a greater feeling of safety due to greater distancing from traffic.

Finally, **a good example where equestrian needs have been catered** for is the East Leeds Orbital Route where there was early consultation with the equestrian community, the use of appropriate surfacing, and the provision of Pegasus crossings.

Case Study – East Leeds Orbital Route

A prime example of access for equestrians being properly included in active travel schemes is the East Leeds Orbital Route (ELOR) www.elor.uk. The 7km bridleway along the ELOR which serves as an orbital route for moving traffic through the east of the city keeps horse riders safely off the road with light-controlled Pegasus crossings to ensure horses can cross the connecting roads safely.

When the ELOR was being planned there was a lot of stakeholder engagement with the stakeholder community in the area to ensure that there was the correct design of the route and associated facilities, and appropriate surfacing.



Image 7. The first equestrian use of the ELOR, supported by West Yorkshire Police Mounted Section.

BHS press release following the launch of the route: www.bhs.org.uk/about-us/latest-news/actor-martin-clunes-comes-to-leeds-to-see-the-award-winning-equestrian-infrastructure-on-the-east-leeds-orbital-route

Draft Cambridgeshire Walk, Wheel and Cycle Strategy 2026–2031**The BHS Overview: Why Equestrian Access Matters**

The British Horse Society welcomes the draft Strategy and its recognition that active travel schemes can affect equestrians and that the access and safety of non-motorised users, including equestrians, should be considered. The BHS is not asking for every walking, wheeling or cycling route to become an equestrian route. The aim is to ensure that equestrian access and safety are considered early and objectively alongside the wider public rights of way (PROW) network, so that improvements for one group do not unintentionally create safety problems, severance or lost opportunities for another.

The key point

The Strategy is principally concerned with walking, wheeling and cycling, but that defined focus should not become a wider policy exclusion for equestrians. Active travel investment often takes place on, alongside or across highways and PROWs. It can therefore improve safety and connectivity for all users, while also creating risks or severance if different parts of the network are planned in isolation.

Six principles that would strengthen the Strategy

- **Consider equestrians from the outset.** New provision should be designed to accommodate equestrians, taking account of the nature, location and intended use of the route. If equestrians are excluded, the specific constraint and evidence should be identified.
- **Assess the consequence of exclusion.** Safety is not only whether an equestrian can use the proposed facility; it is also where an excluded horse rider or carriage driver must travel instead and the consequences for all affected users.
- **Protect and connect the wider PROW network.** Identify existing rights, legal status, gaps, severance, crossings and routes carrying equestrian rights, and consider opportunities to strengthen connectivity.
- **Do not equate accessibility with urbanisation.** Rural PROWs have different functions, legal statuses and authorised users. A sealed surface is not automatically an improvement; surfacing should reflect the route, users, drainage, landscape character and maintenance needs.
- **Make “Access for All” genuinely inclusive.** People access the countryside in different ways, including through riding and carriage driving. Improvements for one user group should not unnecessarily reduce the safety, usability or suitability of a route for another.
- **Make provision deliverable.** Where equestrian or other PROW provision forms part of an active travel or development scheme, its specification, funding, delivery arrangements and maintenance responsibilities should be identified and secured alongside the principal scheme.

Why this matters to safety

Horses and horse-drawn vehicles interact differently with traffic and other path users. The Highway Code advises cyclists encountering horses to slow down, give sufficient space and not pass a horse on its left. Where equestrians are excluded, the assessment should consider where they will travel instead and the resulting safety consequences. Crossings, junctions, barriers, width, surfacing and visibility should be considered before designs are fixed.

A network opportunity, not a competing agenda

The BHS recognises that the WWC Strategy and the PROW network have different purposes and should retain their distinct functions. However, active travel investment should be planned with the wider PROW and countryside-access network in mind where a scheme has a material bearing on access to, connectivity with or safety of that network, including the safe and appropriate access needed to reach existing routes and opportunities to improve connectivity. Consideration should therefore not be limited to locations where the proposed active travel infrastructure directly intersects or physically interacts with an existing PROW.

The BHS asks the Strategy to establish a clear, evidence-based and collaborative approach: consider equestrians early; start from inclusion, taking account of the nature, location and intended use of the route; assess exclusion consequences; protect and connect the wider PROW network; retain the character and function of rural routes; and ensure relevant provision is properly funded, delivered and maintained. The BHS welcomes continued dialogue with the Active Travel Team so equestrian expertise can inform practical and safe solutions early.

Lynda Warth – County Access & Bridleways Officer Cambridgeshire

For horses. For people. For life.

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The British Horse Society

Greater Cambridge Local Plan – Regulation 19

Policy S/CBC – Cambridge Biomedical Campus (including Addenbrooke's Hospital)

Soundness tests: Positively prepared; Justified; Effective; Consistent with national policy

Representation: Support with Modification

1. Introduction

The British Horse Society (BHS) supports the policy's objectives for improved green infrastructure, connectivity and coordinated infrastructure delivery. This representation addresses only matters relevant to Public Rights of Way (PROW), wider countryside access and equestrian connectivity; it does not comment on whether the allocation itself should proceed.

2. A strategic countryside-access network is emerging

The Campus sits within an emerging network of existing, committed and potential countryside-access routes, including the CSET equestrian route, Bridleway 212/2, the new Stapleford Country Park equestrian provision, the Sawston Greenway, the Babraham Road development bridleway and existing/permissive routes towards the Beechwoods and wider countryside. These should be planned as a connected system rather than as separate schemes.

3. The Granham's Road connection must be safeguarded

The CSET Statement of Case currently proposes an equestrian bridleway between Granham's Road and High Street, Babraham, but terminates the route at Granham's Road. The BHS will continue to challenge this termination through the CSET process. The CBC Local Plan should not, however, assume that CSET will provide the missing onward connection: the CSET documentation does not identify a CBC delivery obligation, trigger or timescale for doing so.

The Sawston Greenway provides an important opportunity to contribute to this connection. Its project documentation has expressly contemplated equestrian provision, including a grass verge for equestrians alongside the Genome Path and an improved crossing at Granham's Road. However, the current evidence does not establish that continuous equestrian provision throughout the CBC–Granham's Road section is secured for delivery. The CBC policy should therefore safeguard the connection independently of the final outcome of either project.

4. Preferred connection around the eastern side of the Campus

The BHS is not seeking to route equestrians through the Campus along the CSET busway. The preferred opportunity is for a safe off-road connection from the Granham's Road area through or around the eastern side of the Campus towards the green fields east of the Campus, Babraham Road and the emerging bridleway and wider countryside-access network. This would connect with routes towards the Beechwoods and, in the longer term, opportunities towards Wandlebury and the wider Gog Magog countryside.

This is the type of strategic link that should be protected while the Campus is masterplanned. Once land is developed, an otherwise feasible countryside-access connection could be sterilised.

5. PROW and Active Travel are distinct but complementary

The policy appropriately promotes walking, wheeling, cycling and public transport. These modes should not, however, be treated as a substitute for the wider PROW and countryside-access network, which has distinct functions, legal statuses and lawful users. The policy should therefore recognise the PROW and wider countryside-access network as a distinct but complementary network to Active Travel. The needs of horse riders should be considered at the earliest stage of planning and design, including safe and appropriate access to, and connectivity within, the wider network. Where Active Travel provision can safely accommodate equestrian use, it should do so unless a relevant site-specific physical, environmental, legal or safety constraint provides a clear and evidenced reason for exclusion. Where equestrian use is not proposed, that constraint should be identified and evidenced, together with the consequences for safe access and network connectivity.

6. Previous Council support for PROW and equestrian access

The BHS previously made representations on the Cambridge Biomedical Campus SPD seeking protection and enhancement of Public Rights of Way and safe off-road access to surrounding countryside and amenities. The published response to that consultation records that the Councils recognised the role of the equestrian industry and acknowledged the importance of safe, off-road access to Public Rights of Way. The Councils proposed modifications to the SPD to include reference to PROWs on and surrounding the Campus and to introduce a development principle requiring **“safe access through Public Rights of Way for pedestrians, cyclists and equestrians to surrounding adjoining countryside and amenities”**.

The BHS considers that this previous recognition of the importance of equestrian access is relevant to the current S/CBC policy. The provision should not be lost as the policy framework is updated. The current Plan should carry forward the principle of safe equestrian connectivity through the Campus and to the surrounding countryside-access network, with appropriate routes safeguarded and secured through the Masterplan and Infrastructure Delivery Strategy.

7. Masterplanning and infrastructure delivery

The policy already requires a comprehensive Masterplan and an Infrastructure Delivery Strategy, including funding, delivery mechanisms and appropriate triggers. These provide the appropriate mechanisms to secure the missing countryside-access links. The Masterplan should identify existing, permissive, committed and potential routes, while the Infrastructure Delivery Strategy should identify land, responsibilities, funding and delivery triggers needed to protect and implement them.

Proposed modification

A. Strategic countryside-access network. Add a requirement to ensure that the Campus is integrated with the existing and emerging PROW and wider countryside-access network, recognising this as a distinct but complementary network to the Active Travel network.

B. Safeguarding the Granham's Road connection. Require the Campus-wide Masterplan to identify, safeguard and facilitate a safe off-road equestrian connection from the Granham's Road area through or around the eastern side of the Campus towards Babraham Road and the emerging countryside-access network. Land and route corridors required for future connections should be protected from development that would prejudice their delivery.

C. Wider network connections. Require the Masterplan to identify opportunities to connect the Campus with existing and emerging countryside-access routes towards Haverhill Road, Stapleford, the Beechwoods, Wandlebury and the wider Gog Magog countryside, including opportunities for direct and circular recreational routes.

D. Equestrian access and Active Travel. Require the needs of horse riders to be considered at the earliest stage of planning and designing development and infrastructure. Where Active Travel provision can safely accommodate equestrian use, it should do so unless a relevant site-specific physical, environmental, legal or safety constraint provides a clear and evidenced reason for exclusion. Where equestrian use is not proposed, the constraint and the consequences for safe access to and connectivity within the wider PROW and countryside-access network should be identified and evidenced. This does not require every Active Travel route to accommodate horses or have an equestrian-standard surface. Where carriage-driving rights are intended, the legal status and physical design should reflect those rights.

E. Delivery. Require the Infrastructure Delivery Strategy to identify land ownership, delivery responsibilities, funding mechanisms and appropriate triggers for the timely delivery of strategic PROW and wider countryside-access connections, including links that cannot be delivered immediately but need to be safeguarded for future implementation.

Conclusion

The BHS supports Policy S/CBC with modification. The policy provides an important opportunity to secure a coherent and connected countryside-access network around the Biomedical Campus, building on the Councils' previous recognition of the importance of safe access through Public Rights of Way for pedestrians, cyclists and equestrians to the surrounding countryside and amenities. That commitment should be carried forward into the Local Plan and secured through the S/CBC Masterplan and Infrastructure Delivery Strategy. The policy should safeguard the strategic connection from the Granham's

Road area, protect future route corridors and establish clear delivery mechanisms for these connections. It should also recognise the PROW and wider countryside-access network as distinct but complementary to the Active Travel network and ensure that the needs of horse riders are properly considered at the earliest stage of planning and design.

The British Horse Society**Greater Cambridge Local Plan – Regulation 19****Policies S/EOC/NWO – Land North of Worts' Causeway
and S/EOC/SWO – Land South of Worts' Causeway****Representation: Support with Modification****1. Representation**

This representation applies to both Policy S/EOC/NWO – Land North of Worts' Causeway and Policy S/EOC/SWO – Land South of Worts' Causeway. The policies are considered together because the two allocations form a connected development area and the countryside-access and equestrian network cannot be effectively planned or delivered through either allocation in isolation.

The British Horse Society (the BHS) does not comment on whether the development proposed through these allocations should proceed. The BHS's representation is concerned solely with ensuring that, if the allocations are retained, the policies properly protect and enhance the existing countryside-access and equestrian network and secure the opportunities for connectivity arising from the developments. Both policies recognise the importance of the bridleway network and provide for a green link along Worts' Causeway with space for pedestrians, horse riders and cyclists. The BHS supports these elements of the policies and seeks their strengthening to ensure that the wider countryside-access and equestrian network is not left disconnected.

However, the BHS considers that the policies are not sufficiently effective or specific to secure a coherent equestrian and wider countryside-access network connecting the two developments with the Cambridge Biomedical Campus (CBC) and the wider countryside network.

The BHS therefore supports the policies with modification.

The current Regulation 19 Plan is being examined under the legacy plan-making system. The Councils confirm that the soundness of the Plan is to be considered against the National Planning Policy Framework of 12 December 2024. The four soundness tests include whether the Plan is positively prepared, justified, effective and consistent with national policy.

Paragraph 105 of the NPPF states that planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities and links to existing rights of way networks.

BHS considers that the two Worts' Causeway allocations provide an important opportunity to apply this principle.

2. S/EOC/NWO – Land North of Worts' Causeway

The BHS supports the recognition within Policy S/EOC/NWO of:

- the existing bridleway and rural character of Worts' Causeway;
- the need for appropriate countryside connections;
- the provision of a green link with space for pedestrians, horse riders and cyclists; and
- the relationship between the North and South Worts' Causeway sites.

The policy identifies the North site as approximately 7.84 hectares with capacity for approximately 200 homes. Its movement requirements include public footpaths linking the development with the surrounding chalk farmland and retention of Worts' Causeway as a green link with space for pedestrians, horse riders and cyclists.

However, BHS considers that the policy needs to go further by securing the equestrian element of the wider network, rather than relying upon the general reference to space for horse riders.

Relationship with the South site

The two allocations should not be considered in isolation.

The planning history demonstrates that the two sites were planned as a wider development area comprising approximately 200 dwellings on the North site and approximately 230 dwellings on the South site.

The planning history is particularly relevant to the equestrian network. The officer report for the North site records that:

“A bridleway is proposed to run along the western boundary of the GB2 site, with access given from Worts’ Causeway.”

The report explains that this was intended to provide horse riders travelling from the rural areas east of the developments with access towards the rural area south of Babraham Road.

This demonstrates that the western/peripheral bridleway was identified as part of the planning solution for the GB2 development and is now particularly relevant to the delivery of a coherent equestrian network.

The Plan should ensure that this route is retained, its legal status and continuity are secured, and that it provides meaningful connectivity beyond the site.

3. S/EOC/SWO – Land South of Worts’ Causeway

The BHS supports the current policy’s specific recognition of:

- the existing bridleway;
- the existing permissive footpath on the western edge of the site;
- the country-lane character of Worts’ Causeway; and
- a green link providing space for pedestrians, horse riders and cyclists.

Policy S/EOC/SWO requires these features to be retained and states that the site should provide a green link into the Cambridge Green Belt with space for pedestrians, horse riders and cyclists.

However, BHS considers that the policy does not adequately secure the connection between the proposed bridleway infrastructure on the South site and the wider equestrian network beyond the site boundary.

This is the principal modification sought by the BHS.

4. The western/peripheral bridleway

The South site provides an important opportunity to secure a relatively short but strategically significant section of the equestrian network.

The planning history confirms that a bridleway was proposed along the western boundary of the South site, with access from Worts’ Causeway. The Council’s assessment was that this would provide horse riders with a route between the rural areas east of the development and the rural area south of Babraham Road.

The BHS considers that this peripheral route should be treated as an important component of the wider countryside-access network.

The BHS does not rely in this representation upon the earlier planning history concerning a possible alternative diagonal alignment across the site, as that detail has not been sufficiently verified within the time available for this Regulation 19 submission.

The important point for the Local Plan is that the western/peripheral bridleway was identified as part of the planning solution for the GB2 development and is now particularly relevant to the delivery of a coherent equestrian network.

The Plan should therefore not merely retain the bridleway within the site. It should ensure that its legal status, continuity and connections beyond the site are secured.

5. The Cambridge Biomedical Campus connection

The connection through the Cambridge Biomedical Campus is particularly important.

The CBC area already contains a substantial shared-use route for pedestrians and cyclists. The BHS has historic evidence showing that the route through this area was previously used by equestrians and that bridleway gates and a visible route existed before the present development and infrastructure were constructed.

The BHS does not assert that this historic route was necessarily a recorded public right of way. Its legal status has not been established and it may have operated as permissive access or through another form of land-management arrangement.

Nevertheless, its historical use is important evidence of an established equestrian desire line and of a connection which previously enabled equestrian movement through this part of the countryside.

The present position is particularly significant:

- a shared route for pedestrians and cyclists now exists through the CBC area;
- it is in use;
- the historic equestrian connection has not been retained; and
- the proposed bridleway associated with the South Worts' Causeway development provides an opportunity to reconnect the equestrian network.

In effect, the walking and cycling connection has been provided, while equestrian connectivity is the missing component.

The BHS considers that this should be addressed through the Local Plan rather than leaving the issue to be considered separately by each development or infrastructure project.

6. Linton Greenway and inclusive permissive access

This issue also illustrates a wider planning principle which BHS has raised elsewhere in its Regulation 19 representations.

The BHS recognises the role of Active Travel infrastructure in providing for everyday journeys by walking, wheeling and cycling. However, Active Travel infrastructure should not be treated as a substitute for, or as defining the requirements of, the wider countryside-access network. The exclusion of equestrians from Active Travel infrastructure should not result in the wider countryside-access network being planned solely around walking and cycling. Where Active Travel infrastructure forms part of, or connects to, the wider countryside-access network, the needs of horse riders should be considered from the outset.

The BHS position is that Active Travel and the wider Public Rights of Way/countryside-access network are distinct but complementary.

Where a new shared or permissive countryside-access route is being created, the widest practicable range of appropriate users should be considered from the outset.

This does not mean that every route must accommodate horses. It means that where equestrian use can reasonably and safely be accommodated, it should be considered before a walking/cycling-only solution is established, rather than being treated as a subsequent addition.

This is particularly relevant at Worts' Causeway because there is already:

- a proposed/required bridleway associated with the South site;
- an historic equestrian route towards CBC;
- existing walking and cycling infrastructure through CBC;
- emerging equestrian connections associated with CSET and the wider southern Cambridge network; and
- an opportunity to connect these routes into the wider countryside network.

The current policy should therefore secure an inclusive network, rather than simply a collection of individual routes.

7. Strategic network connection beyond the Worts' Causeway developments

The immediate connection through CBC should form part of a longer-term strategic objective.

The BHS considers that the two Worts' Causeway allocations provide an opportunity to create a connected equestrian and countryside-access network linking:

Worts' Causeway → proposed western/peripheral bridleway → Cambridge Biomedical Campus → Beechwoods/Wandlebury and Roman Road network → CSET/Sawston Greenway and the wider southern Cambridge network.

The purpose is not to require all of these links to be delivered by either Worts' Causeway site individually.

Rather, the Local Plan should identify the strategic connection as part of the wider countryside-access network and safeguard the opportunity to complete it. The Council should use the planning and infrastructure opportunities that remain available through the implementation of the existing permissions, adjoining development and future transport and infrastructure schemes to secure the missing links wherever reasonably practicable. Individual schemes should not prejudice the ability to complete the wider network.

This is particularly important because the current Plan recognises the relationship between the North and South sites. The same integrated approach should apply to countryside access and equestrian connectivity.

8. Permissive access should be inclusive where reasonably practicable

The Worts' Causeway sites also provide a useful example of the wider BHS policy position on permissive access.

A permissive route can make an important contribution to the countryside-access network, but its value is significantly increased where it provides connectivity for the widest practicable range of appropriate users.

BHS therefore considers that the Plan should establish the following principle:

Where development provides new or retained permissive countryside-access routes, the widest practicable range of appropriate users should be considered from the outset, including horse riders and, where legally and physically appropriate, carriage drivers. Where equestrian access is excluded, a clear, site-specific and evidence-based reason for exclusion should be identified, together with an assessment of the consequences of that exclusion for equestrian safety, route continuity and the wider countryside-access network. Where exclusion would leave equestrians using a road or other less suitable route, the resulting safety implications should be specifically assessed and, where necessary, appropriate mitigation or an alternative safe route should be provided.

This is consistent with BHS's wider position that safety should be addressed through appropriate design and mitigation, rather than by simply transferring risk to the excluded user.

It also reflects the NPPF requirement to protect and enhance public rights of way and access and to take opportunities to provide better facilities and links to existing networks.

9. Safety

The BHS considers that safety should be addressed through the design of appropriate countryside-access routes and the safe management of points where different forms of movement interact.

Where equestrian routes cross or interact with roads or other development infrastructure, the design and safety assessment should consider:

- visibility;
- appropriate crossing locations;
- traffic speeds and volumes;
- separation from motor traffic where reasonably practicable;
- adequate space and appropriate surface conditions for horses;
- interaction with pedestrians and cyclists; and
- the potential consequences of conflict between different lawful users.

Where equestrian access is excluded, the consequences of that exclusion should also be considered. In particular, the assessment should establish whether exclusion transfers equestrians onto a road or other route with greater exposure to traffic or other hazards. Where this occurs, the resulting safety implications should be assessed and, where necessary, appropriate mitigation or an alternative safe route should be provided.

The objective should therefore be to provide a safe and coherent countryside-access network for its lawful users, with the design of individual routes and crossing points responding to the circumstances of the site.

10. Rural character and surface treatment

BHS supports the current policy's recognition of the country-lane appearance and character of Worts' Causeway, including its verges and hedgerows.

This should extend to the treatment of the countryside-access network.

The creation of a connection should not automatically result in an established rural route being converted into an urban-style pedestrian and cycle facility.

Where a rural surface is appropriate and safe for its intended lawful users, it should be retained.

Where a more substantial surface is necessary for accessibility, safety or other demonstrated purposes, its design should nevertheless reflect the rural context and the requirements of the full range of intended users.

11. Why modification is necessary for soundness

The BHS considers that the policies contain important elements relating to countryside access, including recognition of horse riders within the Worts' Causeway green link. However, modification is necessary to ensure that the policies are effective in protecting and improving the wider countryside-access and equestrian network associated with the two allocations.

In particular, the policies should:

- recognise the strategic importance of the western/peripheral bridleway and its connection to the wider countryside-access network;
- protect the opportunity for future connectivity towards the Cambridge Biomedical Campus and the wider countryside-access network;
- recognise the importance of maintaining opportunities for onward connectivity towards Beechwoods, Wandlebury and the wider Roman Road network;
- ensure that existing development and infrastructure do not prejudice opportunities for future countryside-access and equestrian connections;
- establish an appropriate principle for inclusive permissive countryside-access routes; and
- ensure that the consequences for equestrian safety and route continuity are considered where equestrian access is excluded.

The BHS recognises that both allocations already benefit from planning permissions and that the Local Plan cannot retrospectively impose new requirements on those permissions. The purpose of the proposed modifications is therefore not to rewrite the existing permissions, but to establish the strategic countryside-access and equestrian network, safeguard opportunities for its future completion and ensure that implementation of the existing developments does not prejudice those opportunities.

This is particularly important because development is already progressing and opportunities to influence the relationship between the two sites, adjoining development and strategic infrastructure will diminish as development is implemented. The Local Plan should therefore provide a clear strategic framework within which remaining planning and infrastructure opportunities can contribute to completion of the wider network.

12. Proposed modification

The BHS requests that Policies S/EOC/NWO and S/EOC/SWO are modified to establish and safeguard a coherent countryside-access and equestrian network associated with the two allocations, while recognising that both sites already benefit from planning permissions.

The following wording is proposed:

Countryside access and equestrian connectivity

The relationship between Land North and Land South of Worts' Causeway and the wider countryside-access and Public Rights of Way network shall be recognised in planning and infrastructure decisions.

Existing bridleways and other countryside-access routes shall be retained and enhanced, with their legal status, continuity, usability and rural character protected.

The western/peripheral bridleway associated with Land South of Worts' Causeway shall be recognised as an important component of the wider countryside-access network. The opportunity for it to connect with the wider network, including towards the Cambridge Biomedical Campus, shall be safeguarded. The implementation of the existing development should not prejudice the ability to provide such connections through adjoining development, future planning applications or appropriate transport and infrastructure schemes.

The strategic relationship between the two Worts' Causeway developments, the Cambridge Biomedical Campus and adjoining strategic transport infrastructure shall be recognised so that the countryside-access and equestrian network can connect between these areas. The implementation of the Worts' Causeway developments should not prejudice the ability to complete the wider connection. The requirements for the Cambridge Biomedical Campus to safeguard and facilitate the corresponding connection from the Granham's Road area should be addressed through Policy S/CBC, its Campus-wide Masterplan and Infrastructure Delivery Strategy. Where adjoining development, future planning applications or transport and infrastructure schemes provide an opportunity to complete the wider network, including onward connectivity towards the Beechwoods, Wandlebury and the wider Roman Road network, those opportunities should be identified and considered at the earliest appropriate stage.

New or retained permissive countryside-access routes should accommodate the widest practicable range of appropriate users, including horse riders and, where legally and physically appropriate, carriage drivers. Where equestrian use is not proposed, the relevant site-specific physical, environmental, legal or safety constraint should be identified and evidenced, together with an assessment of the consequences for equestrian safety, route continuity and the wider countryside-access network. Where exclusion would leave equestrians using a road or other less suitable route, appropriate mitigation or an alternative safe route should be provided where necessary.

The relevant planning and infrastructure processes should identify appropriate land, legal status, funding and delivery mechanisms for future connections where these are necessary and reasonably practicable.

13. Conclusion

The BHS does not comment on whether the development proposed through the two allocations should proceed. Its representation is concerned with the countryside-access and equestrian implications of the policies and with ensuring that, if the allocations are retained and implemented, they do not prejudice the wider network.

The BHS welcomes the explicit recognition of horse riders within the proposed Worts' Causeway green link and the recognition of the bridleway network. However, recognition of horse riders as users of the green link is not sufficient on its own. The Plan should also protect the opportunity for the western/peripheral bridleway to form part of a wider connected countryside-access network.

The two Worts' Causeway developments form part of an important strategic opportunity to protect and extend countryside-access and equestrian connectivity towards the Cambridge Biomedical Campus and, ultimately, the wider network towards Beechwoods, Wandlebury and the Roman Road. The Local Plan should safeguard these opportunities while recognising that the existing planning permissions cannot be retrospectively rewritten. The corresponding requirement to safeguard and facilitate the connection through the Cambridge Biomedical Campus is addressed separately through Policy S/CBC and its Campus-wide Masterplan and Infrastructure Delivery Strategy.

The established walking and cycling infrastructure through the Cambridge Biomedical Campus area, alongside the absence of an equivalent equestrian connection, illustrates why the wider countryside-access network should be considered separately from Active Travel infrastructure and why future opportunities for equestrian connectivity should not be lost.

The BHS therefore requests that Policies S/EOC/NWO and S/EOC/SWO are modified as set out above so that the Plan provides an effective strategic framework for protecting and extending the countryside-access and equestrian network, while ensuring that existing and future development and infrastructure do not prejudice opportunities to complete the wider network.

APP 6

The British Horse Society

Greater Cambridge Local Plan – Regulation 19

Policy S/GF – Land adjacent to A11 and A1307 at Grange Farm

Soundness tests: Positively prepared; Justified; Effective; Consistent with national policy

Representation: Support with Modification

1. Introduction

The British Horse Society (BHS) supports the objectives of Policy S/GF in securing a comprehensive movement and connectivity network for Grange Farm and connections with surrounding communities and employment areas. The BHS does not express a view on whether the Grange Farm allocation itself should proceed. This representation concerns the provision and protection of the Public Rights of Way (PROW) and wider countryside-access network associated with the proposed new settlement.

The policy should be modified so that the PROW and wider countryside-access network is planned as a distinct network alongside the Active Travel network, with appropriate connections between them. The needs of horse riders should be considered at the earliest stage in planning and design, including safe and appropriate access to, and connectivity within, the PROW and wider countryside-access network. Where Active Travel provision can safely accommodate equestrian use, it should do so unless a relevant site-specific physical, environmental, legal or safety constraint provides a clear and evidenced reason for exclusion. Where equestrian use is not proposed, the relevant constraint and the consequences for safe access and connectivity within the wider PROW and countryside-access network should be identified and evidenced.

2. Existing PROW and the need for strategic connectivity

The site-wide Masterplan should therefore identify existing PROWs and other relevant countryside-access routes, their legal status and lawful users, and the connections required to maintain and improve continuity between Grange Farm and the surrounding network. This should include consideration of missing links, severance and opportunities for new or enhanced routes.

Policy S/GF already recognises the need to improve connections to Babraham, Babraham Research Campus, Little and Great Abington, Linton and Whittlesford, including addressing the severance created by the A11 and A1307. These strategic connections should not be considered solely as walking and cycling infrastructure. They also have the potential to contribute to the wider PROW and countryside-access network serving recreation, health, wellbeing and access to the countryside.

Grange Farm is a major new settlement of approximately 6,000 homes. The Strategic Allocations Assessment identifies the Roman Road Byway 4/1 Little Abington as the northern boundary of the site and Public Footpath 4/2 Little Abington as passing through the site and terminating at Grange Farm Cottage. The existing PROW network therefore provides limited permeability through the allocation.

3. The wider equestrian network

The Plan should therefore consider the equestrian network as part of the wider countryside-access network around Grange Farm and should not rely on provision through CSET or other projects to resolve all existing or future connectivity requirements.

The current CSET Statement of Case identifies a bridleway on the Emergency and Maintenance Access Track between Granham's Road and High Street, Babraham. CSET is not yet approved and remains subject to the Transport and Works Act Order process. The proposed CSET equestrian provision is for horse riders; it does not provide equivalent carriage-driving continuity. Grange Farm should therefore be planned to connect into the wider network rather than assuming that CSET will resolve all countryside-access requirements.

The strategic connections identified by Policy S/GF therefore have significance beyond access to the new settlement. They provide an opportunity to improve connectivity between existing communities and the wider countryside, including for horse riders, where safe and appropriate routes can be provided.

The location of Grange Farm is particularly significant for equestrian connectivity. The BHS understands that more than 60 horses are currently liveried in Great Abington. The A11 and A1307 create substantial barriers to safe movement between the Abingtons, Babraham, Grange Farm and the wider countryside.

4. Consistency with Policy S/RSC/BRC

Where carriage-driving rights are intended, the route must have the legal status and design needed to accommodate horse-drawn vehicles; a bridleway for horse riders does not provide the same right.

Policy S/GF should adopt a complementary approach by ensuring that the new settlement is connected to Babraham, the proposed CSET Travel Hub and the wider countryside-access network, rather than relying solely on walking and cycling provision.

Policy S/RSC/BRC provides a relevant internal precedent within the Regulation 19 Plan. It requires improvements to pedestrian, cycle and equestrian routes connecting the Babraham Research Campus with nearby villages, railway stations and the proposed CSET Travel Hub.

5. Active Travel and the PROW network

The same principle should apply to new and improved PROW and wider countryside-access routes. Where carriage-driving rights are intended, the route's legal status and physical design should reflect those rights.

This distinction should not be used to exclude equestrians where Active Travel infrastructure can safely accommodate horse riders. The needs of horse riders should be considered at the earliest stage in planning and design. Where Active Travel provision can safely accommodate equestrian use, it should do so unless a relevant site-specific physical, environmental, legal or safety constraint provides a clear and evidenced reason for exclusion. Where equestrian use is not proposed, the relevant constraint and the consequences for safe access and connectivity within the wider PROW and countryside-access network should be identified and evidenced.

The BHS considers it important that the Local Plan does not conflate the PROW and wider countryside-access network with the Active Travel network. Active Travel infrastructure is primarily concerned with utility journeys, whereas the PROW and wider countryside-access network provides recreational, leisure, health and wellbeing access to the countryside. The two networks should therefore be planned as distinct but complementary networks, with appropriate connections between them.

6. The Roman Road and carriage-driving continuity

The BHS supports the protection of the Worsted Street Roman Road and its archaeological, heritage and ecological interests. Criterion 13(c), which restricts direct access from the new settlement to the Roman Road, should not however inadvertently prevent appropriate PROW and wider countryside-access connectivity involving the existing byway.

The Traffic Regulation Orders applying along the Roman Road do not impose a consistent restriction on all forms of vehicular use. The 1992 Order covering the relevant section north of the Grange Farm allocation prohibits “any vehicle”, subject to specified permit exceptions. By contrast, subsequent Orders applying to other sections of the Roman Road prohibit “any motor vehicle with more than two wheels” and therefore do not prohibit horse-drawn vehicles under their operative prohibition. The 2009 Order applies this approach to sections of Balsham BOAT 4, Linton BOAT 23 and West Wickham BOAT 1, while the 2016 Order applies it to Babraham BOAT No. 3. The 1992 Order therefore creates a break in carriage-driving continuity along the Roman Road. The 1992 Order itself does not identify a specific justification for applying the prohibition to horse-drawn vehicles rather than limiting the restriction to mechanically propelled vehicles. The BHS supports the retention and, where possible through the appropriate statutory process, restoration of

carriage-driving continuity along the Roman Road. This representation does not seek to amend the 1992 Traffic Regulation Order through the Local Plan, nor does it seek to permit mechanically propelled vehicles. Rather, it seeks to ensure that the development of Grange Farm does not prejudice the ability to restore or exercise carriage-driving access in the future. The Local Plan cannot itself amend the Traffic Regulation Order, but it can ensure that the Masterplan and site layout do not create a permanent physical or other barrier between the new settlement and the Roman Road, or otherwise prevent a connection capable of accommodating carriage driving if such access is permitted or subsequently established or restored through the appropriate statutory process.

Proposed modification

Policy S/GF should be amended to require the following:

1. Site-wide PROW and Wider Countryside-Access Strategy

A site-wide PROW and Wider Countryside-Access Strategy shall be prepared as a distinct component of the site-wide Masterplan and planned and delivered alongside the Active Travel network. The Strategy shall identify, safeguard and provide a coherent network of existing, new and enhanced Public Rights of Way and wider countryside-access routes connecting Grange Farm with Little and Great Abington, Babraham, the proposed CSET Travel Hub, Linton and the wider countryside and PROW network.

2. Equestrian inclusion

The policy should require the needs of horse riders to be considered at the earliest stage of planning and design. Where Active Travel provision can safely accommodate equestrian use, it should do so unless a relevant site-specific physical, environmental, legal or safety constraint provides a clear and evidenced reason for exclusion. Where equestrian use is not proposed, the relevant constraint and the consequences for safe access and connectivity within the wider PROW and countryside-access network should be identified and evidenced. Where carriage-driving rights are intended, the route's legal status and physical design should reflect those rights.

3. Continuous and inclusive strategic connection

Replace criterion 13(e), currently requiring the Council/developer to “Explore opportunities” for an active travel connection, with a requirement to secure a continuous and connected countryside-access route between Grange Farm and the wider network towards Babraham, Little and Great Abington, the proposed CSET Travel Hub, the Linton Greenway and surrounding communities, coordinating with the proposed CSET connection if authorised and delivered.

The connection should be planned and designed to accommodate horse riders and other appropriate lawful users, rather than being limited to pedestrian and cycle provision. Where carriage-driving rights are intended or can appropriately be established, the legal status and physical design of the route should provide for horse-drawn vehicles. The route should provide a safe and continuous connection to the wider PROW and countryside-access network and should not rely on provision through CSET or any other project to deliver the necessary connectivity.

4. Clarification of criterion 13(c)

Add to criterion 13(c) that the restriction on direct access from the built settlement to the Worsted Street Roman Road shall not prevent appropriate PROW and wider countryside-access connections being identified and secured where these can be designed to protect the archaeological, heritage and ecological interests of the Roman Road and its setting. The Masterplan and site layout should safeguard an appropriate connection between Grange Farm and the Roman Road and should not create a physical or other barrier to carriage-driving access where such access is permitted or subsequently established or restored through the appropriate statutory process. The restriction should not be interpreted as requiring the permanent exclusion of horse-drawn vehicles from any future countryside-access connection.

Conclusion

Policy S/GF provides an opportunity to address existing severance and create a genuinely connected countryside-access network around a major new settlement. The policy already recognises the need for connections to the Abingtons, Babraham and Linton, but currently frames these largely through Active Travel.

The modifications sought by the BHS would ensure that the Active Travel network and the distinct PROW and wider countryside-access network are planned together but not conflated, and that equestrian users—including carriage drivers—are considered from the outset. They would also ensure that the development does not prejudice the future restoration or exercise of carriage-driving access along the Roman Road, where permitted or established through the appropriate statutory process.

The modifications would strengthen the policy's effectiveness and consistency with the national requirement to protect and enhance public rights of way and to take opportunities to extend, link and improve routes. They would also ensure that the spatial planning of Grange Farm does not unnecessarily perpetuate an existing break in carriage-driving continuity along a wider public highway network.

The BHS therefore supports Policy S/GF with the modifications set out above. The BHS is not seeking through this Local Plan representation to restore mechanically propelled vehicle access along the restricted section of the Roman Road; its position is specifically to protect the opportunity for carriage-driving continuity, subject to the relevant public rights and any appropriate statutory process concerning the existing Traffic Regulation Order.



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British Horse Society Response to the Draft Interim Greater Cambridge Transport Strategy – June 2026

Introduction

The British Horse Society (BHS) welcomes the opportunity to comment on the Draft Interim Greater Cambridge Transport Strategy.

The BHS supports the Strategy's vision of delivering an integrated, accessible and sustainable transport system that supports economic growth whilst improving health, environmental quality and connectivity across Greater Cambridge. We also welcome the Strategy's recognition of a vision-led approach to transport planning and the importance of planning transport infrastructure alongside development from the earliest stages.

The BHS particularly welcomes the fact that the Strategy's definition of Active Travel expressly recognises equestrians and carriage drivers. This is a positive and inclusive approach.

However, that recognition does not appear to be consistently reflected in the subsequent policies, interventions and proposed infrastructure. The remainder of the Strategy predominantly refers to walking, wheeling and cycling, with little explicit reference to horse riders or carriage drivers when describing Greenways, strategic corridors and infrastructure delivery.

The BHS considers that this creates an opportunity to improve the Strategy by making its approach to inclusive access more explicit and consistent.

The following comments are intended to be constructive and to assist in developing a transport strategy which is genuinely inclusive while recognising the different functions of the Active Travel and Public Rights of Way networks.

1. An inclusive approach to transport and countryside access

The Strategy has a clear ambition to improve accessibility, provide transport choice and deliver inclusive infrastructure.

The BHS fully supports these objectives.

Inclusivity should encompass the needs of all legitimate users, recognising that people have different abilities, mobility needs and ways of travelling and enjoying the countryside.

This includes, amongst others:

- people walking and running;
- people wheeling, including wheelchair and mobility-aid users;

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- cyclists;
- horse riders;
- carriage drivers; and
- people with different physical, sensory or other disabilities.

The BHS considers that the Strategy should establish a clear principle that inclusive design means considering the needs of different legitimate users from the outset, rather than assuming that one form of infrastructure or one design solution is appropriate for everyone.

This is particularly important in rural areas, where the function, landscape setting and user requirements of a route may differ substantially from those of an urban transport corridor.

2. Consistency between the definition of Active Travel and the proposed infrastructure

The Strategy is welcomed for explicitly recognising equestrians and carriage drivers within its definition of Active Travel.

However, this recognition is not consistently reflected throughout the document. Subsequent sections predominantly refer to walking, wheeling and cycling when describing Active Travel infrastructure, strategic corridors, Greenways and delivery programmes.

This creates uncertainty as to whether the proposed infrastructure is intended to accommodate all of the user groups identified within the Strategy's own definition of Active Travel, or whether some interventions are intended to serve only a subset of those users.

The BHS therefore recommends that the Strategy be reviewed for consistency.

Where infrastructure is intended to accommodate equestrians and carriage drivers, this should be stated explicitly. Where a particular user group is not intended to be accommodated, the reason should be clearly identified and supported by an evidence-based assessment.

This would ensure that the Strategy's definition, policies and delivery programme are aligned.

3. Distinguishing between the Active Travel and Public Rights of Way networks

The BHS considers it important that the Strategy distinguishes between two complementary but different networks.

The **Active Travel network has a primary role in supporting utility journeys**, including journeys to employment, education and services.

The **Public Rights of Way network has a different primary role**, providing opportunities for leisure, recreation, exercise, health and wellbeing, access to nature and enjoyment of the countryside.

The distinction is important because the two networks have different functions and may require different design approaches.

This does not mean that the networks should operate independently. They should be planned as **complementary and interconnected networks**, allowing people to move safely and conveniently between utility travel and recreational countryside access.

Nor does it mean that an Active Travel route in a rural or semi-urban / rural setting cannot accommodate a wider range of legitimate users. Rather, the design should respond to its location, function and anticipated users.

The BHS therefore recommends that the Strategy adopts the following principle:

The Active Travel and Public Rights of Way networks should retain their distinct primary purposes, characteristics and design requirements while being planned as complementary and interconnected networks where this improves accessibility and connectivity.

The Strategy should not, however, lead to the urbanisation of the existing rural Rights of Way network. Its rural character and appropriate natural surfaces should be protected.

4. Context-sensitive rural design

The recently published Active Travel England Rural Design Guide provides a valuable opportunity to strengthen the Strategy's approach to rural infrastructure. The Guide was published on 14 July 2026 and emphasises that rural routes should be designed to reflect their particular context rather than applying a uniform urban approach. ([Active Travel England](#))

The BHS supports this principle.

In particular, Greenways and other routes connecting urban and rural areas should not automatically be regarded as extensions of urban cycle infrastructure. They often occupy an important transition between:

- central urban areas;
- urban and semi-urban areas;
- villages; and
- the wider countryside.

They can therefore perform several functions and may appropriately incorporate different forms of provision. The BHS recommends that the Strategy recognises the principle that:

Rural transport and Active Travel infrastructure should be designed according to its context, function, landscape setting, environmental characteristics and anticipated users, rather than through the application of a single standard cross-section or surface treatment.

5. Surface treatment and rural character

The BHS supports appropriate sealed surfaces where they provide a clear safety or accessibility benefit. For example, a bound surface may be appropriate where an equestrian route provides a safe alternative alongside a busy road.

However, this should not lead to an assumption that sealed surfaces are the appropriate default for rural recreational Rights of Way.

The Rural Design Guide recognises that surface materials need to respond to the requirements of different users and that, where paths are designated for equestrian use, surface materials should account for the requirements of horses, with a separate natural surface 'trotting strip' being identified as an option. ([Active Travel England](#)) The BHS therefore recommends the following principle:

Route surfacing should be appropriate to the route's function, location, landscape character, environmental considerations and anticipated users. Sealed surfaces may be appropriate where they provide safe and practical connectivity, particularly alongside busy roads or within urban and semi-urban environments, but should not be treated as the default solution for rural recreational Rights of Way.

This approach supports accessibility without equating accessibility automatically with urban-style surfacing.

6. Greenways as the interface between the two networks

The BHS considers Greenways to be particularly important because they frequently provide the link between urban Active Travel networks and the surrounding countryside.

They can therefore provide opportunities to:

- connect settlements;
- provide utility journeys;
- improve access to employment and education;
- connect people with the countryside;
- reduce interaction between slower-moving users and motor traffic; and
- address gaps in the wider countryside-access network.

The Rural Design Guide recognises the role of equestrians in rural Active Travel design and states that horse riders should not be purposefully excluded through inattentive design. It also recognises opportunities for new routes to improve connectivity within fragmented equestrian networks. ([Active Travel England](#))

The BHS therefore recommends that:

Where Greenways and other rural Active Travel corridors intersect with safe off road access, run alongside roads or could usefully connect with the Public Rights of Way network, the opportunity for inclusive connectivity should be considered from the earliest stage of planning and design.

The BHS further recommends that **inclusive provision should be the starting point** for such routes.

Where a legitimate user group is excluded, the reason should be clearly identified and supported by robust, site-specific evidence demonstrating why inclusion cannot reasonably be achieved or why an identified safety issue cannot reasonably be mitigated through design.

This establishes inclusion as the starting point rather than exclusion.

7. Inclusive access should not mean uniform provision

The BHS considers that a genuinely inclusive transport and countryside-access network should provide **choice**, rather than seeking to make every route identical.

Different users may require different types of infrastructure, and different environments require different design solutions.

For example, an inclusive network may appropriately include:

- sealed routes;
- natural-surface routes;
- segregated provision;
- shared-use provision;
- bridleways;
- restricted byways;
- BOATs;
- quiet rural routes; and
- suitable highway connections.

The objective should therefore be a network that offers appropriate choices to people with different abilities, mobility needs and interests.

This is particularly relevant to accessibility.

8. Accessibility and access to the countryside

The Strategy places appropriate emphasis on accessibility and inclusion.

The BHS supports this but considers that **accessibility should not automatically be equated with hard surfacing**. People with reduced mobility may wish to experience the countryside itself, including natural landscapes, tracks and rural routes, rather than simply travelling along an urban-style accessible path.

Modern mobility equipment can enable people with different levels of mobility to use a wider range of natural surfaces. The appropriate response should therefore be to understand the needs and preferences of users and provide a range of suitable opportunities wherever practicable.

Accessibility can also be supported through consideration of community or countryside-access schemes providing suitable all-terrain mobility equipment where appropriate.

The BHS therefore recommends that the Strategy adopts the principle that:

Inclusive access should enable people to experience the countryside, rather than assuming that the countryside must be urbanised in order to make it accessible.

9. Carriage driving as part of inclusive access

The Strategy appropriately includes carriage drivers within its definition of Active Travel.

The BHS considers this particularly relevant when accessibility is discussed.

Carriage driving can provide people who are unable or less able to sit astride a horse with a means of continuing to enjoy the countryside. Adapted carriages can also enable people with disabilities to participate directly in carriage driving. The BHS carriage-driving information identifies this as an important aspect of the activity.

This is not a request for all routes to be designed around specialist or large carriages.

Many modern recreational carriages are approximately 1.25m wide and can therefore use many existing routes where access is otherwise suitable.

The relevant principle is therefore one of **avoiding unnecessary exclusion**.

Where physical restrictions are introduced to prevent unlawful motorised use, they should be proportionate and should not unnecessarily prevent legitimate non-motorised vehicles from exercising their rights.

This principle applies equally to other legitimate non-motorised vehicles, including adapted bicycles and cargo bikes.

10. Higher-rights connectivity

The BHS recommends that the Strategy avoids using "bridleway" as shorthand for all equestrian and carriage-driving connectivity.

A bridleway provides rights for pedestrians, cyclists and horse riders but does not provide a right for horse-drawn vehicles.

Where the Strategy is discussing connectivity for the full range of higher-rights users, it should therefore refer, as appropriate, to:

- bridleways;
- restricted byways;
- BOATs; and
- suitable highways.

Alternatively, "higher-rights network" may be used where a strategic reference is intended.

This will help ensure that carriage-driving connectivity is not inadvertently overlooked.

11. New development and transport infrastructure

The Strategy rightly recognises the importance of planning transport infrastructure alongside development and delivering infrastructure from the earliest stages.

The BHS strongly supports this approach.

New:

- housing;
- commercial and employment development;
- roads;
- rail infrastructure;
- Greenways; and
- other strategic transport infrastructure

can provide some of the best opportunities to address historic severance, complete missing links, provide safe crossings and improve connectivity between existing countryside-access routes.

These opportunities are often most readily secured at the planning and design stage. Once development or infrastructure is complete, retrofitting suitable connections can be considerably more difficult and expensive. The BHS therefore recommends that the Strategy establishes a clear principle that:

New housing, commercial development and strategic transport infrastructure should be planned as opportunities to protect, enhance and connect the wider countryside-access network. Where a development or infrastructure project creates an opportunity to improve connectivity for legitimate users, inclusive provision should be the starting point.

Where a legitimate user group is excluded, the reason should be clearly identified and supported by robust, site-specific evidence demonstrating why inclusion cannot reasonably be achieved.

This approach would provide a consistent expectation for developers, planning authorities and highway authorities from the outset.

12. Connectivity and network planning

The Strategy should recognise that connectivity is not simply about individual routes.

A route can be well designed and maintained but still provide limited benefit if it:

- terminates at a busy road;
- lacks a safe crossing;
- is severed by development;
- does not connect to another suitable route; or
- fails to connect with an appropriate Active Travel or countryside-access route.

The BHS therefore recommends that strategic transport planning considers **network connectivity and severance**, including the relationship between Active Travel routes, Greenways and the wider Public Rights of Way network.

This would provide a stronger basis for identifying opportunities through development and transport investment.

13. Collaborative implementation

The BHS welcomes the Strategy's commitment to stakeholder engagement.

The Society would welcome the opportunity to contribute constructively to the development of:

- future corridor studies;
- Greenway schemes;
- rural Active Travel design;
- development-related transport strategies;
- network connectivity assessments; and
- future design guidance.

Early engagement can help identify opportunities for inclusive provision before designs become fixed, reducing the need for costly retrofitting and helping to minimise potential conflicts between different users.

The BHS believes that designing for foreseeable interactions between different legitimate users is preferable to relying on exclusion as the default means of managing potential conflict.

Conclusion and recommendations

The British Horse Society welcomes the positive direction of the Draft Interim Greater Cambridge Transport Strategy and particularly welcomes its explicit recognition of equestrians and carriage drivers within its definition of Active Travel.

The Strategy can, however, be strengthened by ensuring that this inclusive approach is consistently reflected in its policies, proposed infrastructure and delivery programmes.

The BHS recommends that the Strategy:

1. **Maintains a clear distinction between the Active Travel and Public Rights of Way networks**, recognising their different primary purposes while ensuring that they are planned as complementary and interconnected networks.
2. **Defines inclusive access clearly** and recognises the different needs of people walking, wheeling, cycling, horse riding, carriage driving and other legitimate users.
3. **Adopts inclusive provision as the starting point** for Greenways, rural Active Travel corridors and relevant new off-road infrastructure where these routes can connect with or enhance the wider countryside-access network.
4. **Requires robust, site-specific evidence to support exclusion** of a legitimate user group, rather than relying on generic assumptions or broad caveats.
5. **Uses the Active Travel England Rural Design Guide positively** to support context-sensitive rural design and avoid inattentive exclusion of legitimate users. The Guide is current national guidance published in July 2026 and specifically addresses rural design, including the relationship between rural Active Travel routes and equestrian use. ([Active Travel England](#))
6. **Recognises that different routes require different surfaces and designs**, and that accessibility should not automatically be equated with urban-style hard surfacing.
7. **Protects the rural character and appropriate natural surfaces of the Public Rights of Way network**, while supporting sealed surfaces where they provide a safe and appropriate solution, including alongside busy roads.
8. **Treats Greenways as an important interface between the Active Travel and countryside-access networks**, considering inclusive connectivity from the earliest stage of design.
9. **Uses new housing, commercial development and strategic transport infrastructure as opportunities to protect, enhance and connect countryside access**, rather than considering access only as a mitigation issue.
10. **Recognises carriage driving within the wider inclusive-access approach**, particularly in relation to accessibility and mobility, without implying that all routes need to accommodate large or specialist carriages.
11. **Uses precise terminology for higher-rights routes**, recognising the different rights associated with bridleways, restricted byways and BOATs.

12. **Plans for foreseeable interactions between legitimate users through appropriate design**, rather than relying on exclusion as the default response to potential conflict.

The BHS considers that these amendments would strengthen the Strategy without changing its fundamental direction. They would provide a clearer and more consistent framework for inclusive transport planning across Greater Cambridge, while respecting the distinct purposes of the Active Travel and Public Rights of Way networks.

Importantly, they would also provide a coherent policy basis for the forthcoming **Greater Cambridge Local Plan and Cambridgeshire Rights of Way Improvement Plan**, ensuring that new development, Greenways and transport infrastructure can contribute to a genuinely connected and inclusive countryside-access network.

The British Horse Society looks forward to continuing to work collaboratively with the Cambridgeshire and Peterborough Combined Authority, Cambridgeshire County Council and their partners to help achieve these objectives.

Lynda Warth
County Access & Bridleways Officer – Cambridgeshire.

15th August 2026.

APP 8

Sawston Riding School



Sawston Riding School location – Bridleway 196/24 is the nearest public bridleway and the one which emerges between Restricted Byway Sawston 196/27 and the CEST route.

APP 9

East West Rail Scheme – Feasibility work indicating consideration of connectivity between EWR Lineside Path and the wider NMU network

A feasibility study has therefore been undertaken

The objectives of the study are to:

- Identify a continuous end-to-end Lineside Path
- Understand how a Lineside Path could address gaps in the existing route wide NMU network
- Determine which sections of a Lineside Path could be prioritised for delivery by EWR.
- Determine which sections of a Lineside Path could be delivered by others.

Maintenance Access Track



Maintenance Access Strip



APP 10

CBC Onward Connectivity

Historically, there was access for equestrians from CBC to GB1 site and to the permissive bridleway. The BHS do not claim that this was a public right of way but it had been used for many years to the extent that the gates on to Babraham Road were both bridlemway gates as can be seen from the Google Earth historic data:

CBC south side of Babraham Road 2017



GB1 north side of Babraham Road 2021



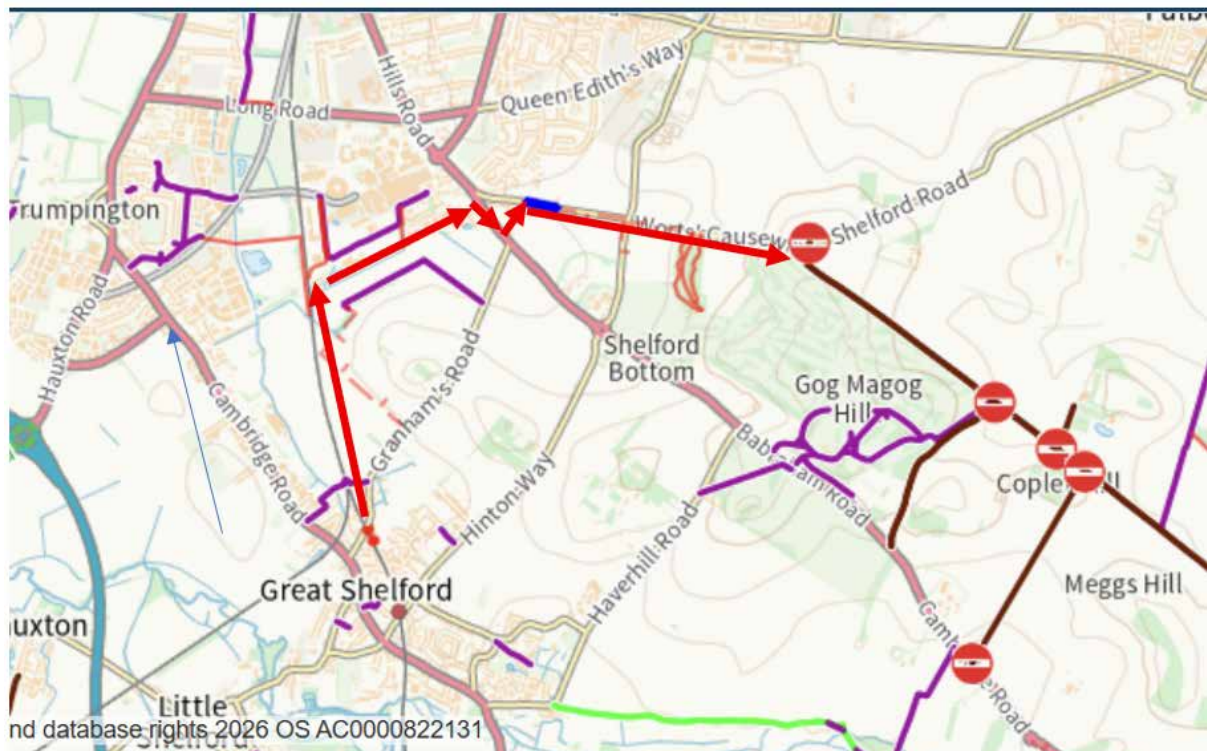
By 2021, the path from CBC had been 'improved' to a cycle and pedestrian only path with no reference or consultation with BHS / local horse riders, despite the onward connection being of bridlemway status.



The permissive bridlemway on GB1 is being dedicated as a bridlemway:



The 'wish list' for pedestrians, cyclists and equestrians is a safe, off road link from CBC to the Roman Road:



The various schemes – CSET, Sawston Greenway, CBC cycle path, CBC Bridleway Strategy, Worts Causeway provision, existing permissive path could make that a reality if all the access were available for all non motorised users.