Patron Her Majesty The Queen

The British Horse Society

Email enquiry@bhs.org.uk
Website www.bhs.org.uk

Abbey Park, Stareton, Kenilworth.

Tel 02476 840500

Fax 02476 840501

Bringing Horses and People Together

Warwickshire CV8 2XZ

British Horse Society

Alex Stafford, Planning Officer

Via email: alex.stafford@ashford.gov.uk

17<sup>th</sup> August 2022

Dear Alex

## RE: 22/00668/AS: Full Planning Permission Land south of M20, Church Lane, Aldington, Kent

I am responding to this application on behalf of the British Horse Society, the UK's largest equestrian charity with 118,000 members and representing the country's 3 million horse riders.

Just 16.7% of public rights of way in Kent are available to equestrians and much of that is disconnected by roads which were once quiet rural roads and are now busy thoroughfares as a result of development in the region. Consequently, it is imperative, especially with developments of this nature, that new bridleways/byways and good connections to existing equestrian routes (including safe crossings where needed) are provided as a condition of planning permission.

Despite regular requests over the past year, Engena has not taken the opportunity to engage with the Society despite saying in September, "We are just in the final stages of designing the site and in the coming week we will have a detailed picture of the arrangement of panels with respect to the rights of way in the area. EDF Renewables would be delighted to speak with you, perhaps if we could come back to you in the coming days once we have the layout details?"

## NPPF, para 100 states

"planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails" (my emphasis). Highway safety is a 'material planning consideration' and therefore any development should seek to improve highway safety at any opportunity by facilitating segregation of motorised and non-motorised users. This can obviously be achieved by creating bridleways or byways so that equestrians, together with walkers and cyclists, are not sharing routes with motor traffic. The proposal made by the BHS was that the opportunity could be taken to secure some off-road provision for local equestrians as a part of this development, perhaps by upgrading footpaths AE656, AE657 and AE457 to bridleways, thus providing an off road circular route for local equestrians. Sadly, I can see no sign that this proposal has been included in the application.

Within the TN25 area there are almost 900 passported horses<sup>1</sup> and a further 200 within the CT21 area contributing around £6 million<sup>2</sup> to the economy each year. Furthermore, higher status public rights of way provide the opportunity for safe exercise for more members of the local community, in particular women (who form the majority of equestrians) and those who are less able bodied so provision of this nature within a planned development can only help to contribute to the local economy as well as potentially provide more support from local people.

<sup>&</sup>lt;sup>1</sup> DEFRA FoI Request April 2021

<sup>&</sup>lt;sup>2</sup> BETA The National Equestrian Survey 2019

Whilst we applaud efforts to provide renewable energy, we object to this application in its current format as we feel that such projects must be done in a way which maximises the use of land which will be lost to agriculture to ensure it at least provides the best recreational use for local people.

Yours faithfully

Sarah Rayfield (Mrs.)		
Access Field Officer - London & S	South	East
Email		

Tel:

Mob: