

Enterprise and Business Committee
Active Travel (Wales) Bill
AT 20b – The BHS Welsh National Committee

Response to The National Assembly for Wales ' Enterprise and Business Committee's call for evidence on the general principles of the Active Travel (Wales) Bill

Dear Madam

I am writing in response to the call for evidence on the general principles of the Active Travel (Wales) Bill in my capacity as Chair of The BHS Wales National Committee.

Firstly I write to fully endorse the comments put forward by Mark Weston, Director of Access for The British Horse Society, and the comments put forward by Jeanne Hyett, the Wales Regional Access and Bridleways Officer.

I understand that over a 1/3 of the responses received to the initial consultation were from horse riders and carriage drivers. I am extremely disappointed, therefore, that their comments have been ignored. The exclusion of horse riders and carriage drivers from this Bill is not only shortsighted, but is likely to lead to an increase in the amount of road accidents.

There seems to be a total lack of understanding of the amount of money brought into the economy of Wales by horse owners each year. This is evidenced by the fact that all Bills currently coming forward for consultation seem to ignore their existence completely. This fact, combined with the apparent omission of consultees comments in such Bills as this, leads me to believe that the fuller picture is not being taken into consideration by the Welsh Government.

I urge you to reconsider the exclusion of horse riders and carriage drivers from this Bill.

Thank you

Yours faithfully

Felicity Wills
Chair of The BHS Welsh National Committee

• the requirement on local authorities to continuously improve routes and facilities for pedestrians and cyclists (section 7);

Such a requirement will inevitably result in investment in these routes being prioritised over investment in improving existing rights of way which do not make up these facilities

• the requirement on highway authorities to consider the needs of pedestrians and cyclists when creating and improving new roads (section 8)

It is important that the requirement obligates highway authorities to consider the needs of equestrian users as well as pedestrians and cyclists when creating and improving new roads

3. Have the provisions of the Bill taken account of any response you made to the Welsh Government's consultation on its White Paper? Please explain your answer.

No they have not. Despite the number of responses received from equestrians stating that the Bill should provide for them, they are still not included provided for in the bill. It is stated that the bill is for journeys of up to 45 minutes. A lot of riding horses are kept very close to urban areas and are therefore situated well within this journey time.

4. To what extent are the key provisions the most appropriate way of delivering the aim of the Bill?

They are appropriate not because they are too restrictive.

5. What are the potential barriers to the implementation of the key provisions and does the Bill take account of them?

Cost will be a barrier to provision and deliverability and the restrictive nature of the Bill will prevent best value of tax payers money being achieved.

6. What are your views on the financial implications of the Bill (this could be for your organisation, or more generally)? In answering this question you may wish to consider Part 2 of the Explanatory Memorandum (the Impact Assessment), which estimates the costs and benefits of implementation of the Bill.

An unintended consequence, unless considerable extra funding is to be provided to local authorities to fulfil their duties under the bill, could be that other local authority funds that would have been spent on improving or developing other routes as set out in rights of way improvement plans will be reduced so that they can fulfil their obligations under this bill.

7. To what extent has the correct balance been achieved between the level of detail provided on the face of the Bill and that which will be contained in guidance given by the Welsh Ministers?

The BHS does not consider that it has been achieved as the Bill does not provide for all non motorised users, and in particular equestrians. The Bill has not reflected the views of the Countryside Council for Wales that the opportunity should not be lost for these routes to have a recreational function as well as a transport function.

8. Are there any other comments you wish to make on the Bill that have not been covered in your response?

The BHS is very concerned that an inevitable consequence of the Bill will be that the restrictions which will emanate from it will leave equestrians far worse situation than they are at present, with them being excluded from routes that they currently use and being displaced onto the road routes which are considered not to be conducive to enticing more people to walk and cycle. The BHS cannot fathom how it is reasonable that a route that is not considered to be conducive to walk or cycle on can be considered to be conducive to ride or carriage drive along.

Horses are a form of transport, whilst the majority are ridden recreationally some are still used as a form of transport or in the course of a person's employment. By far the greatest use of the bicycle is also recreational. Just as walking is an alternative to using a car, so going on horseback or in a horse-drawn vehicle is the alternative to using a horsebox or a car with a horse trailer in order to reach a destination with a horse. Both of the latter are undoubtedly transport, and the use of a horse on its feet is undoubtedly the green alternative to these means of transport.

The British Horse Society

1. The British Horse Society (BHS) represents the interests of the 3.4 million people in the UK who ride or who drive horse-drawn vehicles. With the membership of its Affiliated Riding Clubs and Bridleway Groups, the BHS is the largest and most influential equestrian charity in the UK . The BHS is committed to promoting the interests of all equestrians and the welfare of horses and ponies through education and training.
2. The equine industry is estimated to be worth £7 billion to the UK economy and to employ 220,000 – 270,000 people.
3. 90% of riders are female^[1]. 25% of riders are aged under 16 years and 48% are aged under 24 years.^[2]
4. The Strategy for the Horse Industry in England and Wales , published in December 2005, was prepared by the British Horse Industry Confederation in partnership with the Department for Environment, Food and Rural Affairs, the Department for Culture, Media and Sport and the Welsh Assembly Government^[3].
5. The Strategy includes the following aim:
Aim 5 'Increase access to off-road riding and carriage driving', including the encouragement and improvement of urban and suburban riding and carriage driving.

The Paucity of the Equestrian Public Rights of Way Network

6. The length of the public right of way network in Wales currently amounts to 33211km, consisting of 26320km of footpaths, 4965km of bridleways, 431km of byways and 1495km of restricted byways. Horse riders therefore, currently have access to only 21% of public rights of way and horse-drawn vehicle drivers to only 6%. ***Many rights of way are now disconnected from each other because the roads that should connect them are no longer safe for equestrians to use because of the speed and volume of motorised traffic on them.*** This leaves many equestrians without a safe local route to use.

Road Safety

7. Over the years road design has provided safe refuges and paths for walkers and cyclists, but in the process has mainly forgotten the needs of equestrians and in some cases made things even worse for equestrians. In Rhondda Cynon Taf the erection of barriers forced horse riders off their customary safe route and forced them to ride on the road instead when this was deemed by the Council not to be appropriate for walkers and cyclists because of safety issues.

8. The NHS Hospital episode statistics for 2011 – 12 show that there were 4,142 'animal rider or occupant animal drawn vehicle injured in transport accident' (V80)

<http://www.hesonline.nhs.uk/Ease/servlet/ContentServer?siteID=1937&categoryID=211>

9. 504 road accidents involving horses have been recorded on The Society's <http://www.horseaccidents.org.uk/> reporting website since it was launched in the autumn of 2010. Many accidents and near misses are still not being recorded yet so the total should be much higher

10. In 2011 and 2012 there were 400 incidents on roads reported to the website. These included:

- 10 rider fatalities
- 62 serious rider injuries
- 31 horse fatalities
- 19 serious horse injuries.

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