

## British Horse Society (BHS) Statements for Tunbridge Wells Local Plan Hearings 2022

### **Matter 6, Issue 1 Tudeley village.**

Q3. The submission version Policies Map for Tudeley Village shows land beyond the Limits to Built Development forming part of the allocation. What is the reason for this? Is all of the allocation proposed to be removed from the Green Belt?

The land to the north appears to be set aside as open space. However, it appears that while it will include other recreational and sport facilities, this open space will not include any equestrian facilities, not even a livery stables to replace the livery stables to be lost at Bank Farm. There is a lack of provision for children and adults to learn to ride in the Borough of Tunbridge Wells (only two small licensed riding schools in the whole Borough, one near Cranbrook and one on the very narrow Kings Toll Road at Pembury) and this deficit will increase substantially with the thousands of new families who will occupy the new housing planned at Tudeley. The opportunity should be taken here or at Paddock Wood (possibly at both) to provide an equestrian centre with associated riding routes, which could become a centre of excellence. Trent Park and Lee Valley Park in London are both excellent examples of riding centres combined with dedicated off-road riding circuits that are integrated with other sports and leisure facilities and easily accessible by public transport. Integrating sports facilities in this way is ideal as it enables family members to pursue their various sporting and leisure interests close to each other.

A person keeping a horse at Do-It-Yourself livery will need to make two or three visits per day to the stables to look after their horse, and a person keeping a horse at full livery will usually visit several times a week in order to ride it. If a stables offering livery is not available as part of this development, and hence is not easily accessible via a cycle route or frequent bus route, the result will be multiple car trips on the roads and the rural lanes of the Borough and of the adjoining Borough.

Q6. Where it has been concluded that it is necessary to release Green Belt land for development, paragraph 142 of the Framework states that Plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. How will this be achieved?

Equestrians wait to hear this with interest but at present there seems to be no sign of any compensatory improvements in accessibility to Green Belt land for equestrians, yet they are the category of vulnerable road users with the least access to safe off-road routes. Tunbridge Wells Borough has an excellent network of public footpaths but a particularly poor level of public bridleway provision, with Bedgebury Forest being the only area that has anything vaguely resembling a network of public bridleways.

## BHS Matter 6 contd

Q10. Does the Plan support an appropriate mix of uses across the site to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities, as required by paragraph 106 of the Framework?

It does not, please see our answer to Q3 above. It should be noted that the equestrian industry is also an employer. As well as riding stables, people employed in the industry need safe routes to ride on. The number of passported horses owned within the TN12 area is 1550 (source DEFRA FoI April 2021), contributing a sum in excess of £8.5 million per annum to the economy (source BETA 2019), much of it local.

Q15. How will connectivity with Tonbridge be provided for non-car modes of transport?

Whilst the BHS supports the national initiative to encourage more cycling and walking as part of Active Travel Plans it is *imperative* that Active Travel plans ALSO include equestrians.

The government's Cycling and Walking Investment Strategy Safety Review says:

*"1.2 But safety has particular importance for vulnerable road users, such as walkers, cyclists and horse riders. All road users have an equal right to use the road, and safety and the perception of safety are key factors in determining how far people use these modes of transport. The safer they feel, the more they will use these active modes of travel. The more people who use Active Travel, the fitter and healthier they will be, and the more their communities will benefit from lower congestion and better air quality, among a host of other benefits"(Jesse Norman, Minister for Transport p 4)*

Jesse Norman in House of Commons debate on Road Safety, 5 November 2018:

*"We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders"*

And final point by Jesse Norman in debate:

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

The alternative to riding a horse to a venue (active travel) is to take it in a horse trailer or lorry, burning fossil fuels and creating pollution.

It would be helpful if TWBC, KCC and the Hadlow Estate could give some firm commitments to providing permanent, joined-up public routes that equestrians can use.

### **Matter 6, Issue 2**

#### **Five Oak Green**

Q2. What are the 'compensatory improvements to the Green Belt, including measures to reduce flooding to particular areas of Five Oak Green'? How will they be delivered?

Here again, better access for equestrians would be welcome, especially if it can be joined up with access to Tudeley, East Capel and Paddock Wood.

### **Matter 6, Issue 3**

Q6. Where it has been concluded that it is necessary to release Green Belt land for development, paragraph 142 of the Framework states that Plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. How will this be achieved?

Equestrians wait to hear this with interest but at present there seems to be no sign of any compensatory improvement in accessibility to Green Belt land for equestrians, yet they are the category of vulnerable road users with the least access to safe off-road routes. Tunbridge Wells Borough has an excellent network of public footpaths but a particularly poor level of public bridleway provision, with Bedgebury Forest being the only area that has anything vaguely resembling a network of public bridleways. There are at present just three short bridleways in this area, separated by roads, so horse riders have no choice but to ride on the roads near Paddock Wood and these are becoming increasingly busy. Despite the measures being taken in this Plan to provide cycle and bus routes, the new housing will lead to even more cars on the lanes around Paddock Wood, effectively forcing horse riders off the roads, and there should be a compensatory improvement in permanent public off-road access to the countryside for equestrians.

The proposed new cycle routes should be bridleways wherever possible, creating a joined-up bridleway network in which circular routes are possible, and horse riding routes should perhaps also be provided through the proposed wetland park.

Q11. How have the type and location of community uses been established? For example, what is the justification for the proposed sports hub (including a 25m swimming pool) and why is it in the location proposed?

There is a lack of provision for children and adults to learn to ride in the Borough of Tunbridge Wells and this deficit will increase substantially with the thousands of new families who will occupy the new housing at Paddock Wood and East Capel. A new facility will be needed in the Paddock Wood area to provide an equestrian centre for excellence & learning. Trent Park and Lee Valley Park in London are both excellent examples of riding centres combined with dedicated off-road riding circuits that are integrated with other sports and leisure facilities and easily accessible by public transport. Integrating sports facilities in this way is ideal as it enables family members to pursue their various sporting and leisure interests close to each other. With the proposed creation of the new outdoor sports hub in Paddock Wood/East Capel there is an opportunity to provide similar top quality facilities that would help to remedy the shortage of riding schools in the area and the current lack of any joined-up bridleway circuit.

The proposed site for the sports hub shown on Map 28 in the SLP appears to differ from the site proposed in the Regulation 14 consultation on Paddock Wood's Neighbourhood Plan. Either way, the sports hub should include an equestrian centre with an associated riding circuit. If there is not the space to combine an equestrian centre with the sports hub in either of those places, an equestrian centre should be included as an element linked to the proposed wetland park.

Q12. In the location envisaged, will the sports hub be accessible to existing and future residents of Paddock Wood by sustainable modes of transport?

In the position shown on map 28 of the SLP it appears unlikely that many residents of Paddock Wood will access it on foot. Wherever the sports hub and a new equestrian centre are situated, they will need to be accessible by bicycle and by bus, and preferably also on horseback/horse-drawn carriage.

Q15. How will the north-south pedestrian and cycle link over the railway line be provided as part of the western parcel? Is it deliverable?

A modification is needed to ensure that the north-south link over the railway line will be designed to allow use by horse riders as well as by pedestrians and cyclists.

Q17. What will be the main point of access for the parcel to the east of Paddock Wood? How will pedestrian, cycle and vehicular accessibility to the rest of Paddock Wood (to the west) be achieved?

This is unclear, and the fear must be that a considerable amount of vehicular traffic heading towards the A21 from the eastern side of Paddock Wood will use the rural lanes through Brenchley, Matfield and Horsmonden instead of going through Paddock Wood to the A228.

Equestrians should be included in an active travel corridor provided from east to west, though it probably does not need to lead into the town centre. In the east of the parish there should be provision for equestrian routes through the proposed new green spaces, linking as closely as possible to public bridleway WT319 in Paddock Wood parish and public bridleway WT 315 in Brenchley and Matfield parish, which ends on the boundary of Paddock Wood parish. A public bridleway link, rather than just a cycle route, from the Mascalls School area to Brenchley and Matfield would also be useful.

**Matter 7, Issue 1,  
Royal Tunbridge Wells allocations  
Land North of Hawkenbury Recreation Ground (policy AL RTW19)**

Q40. What is the purpose and justification for the allocation? Is it sufficiently clear to users of the Plan?

Presumably the existing planning permission may have made this allocation and the conditions associated with it redundant. The existing planning permission, if implemented, will effectively make this end of High Woods Lane, which is a public bridleway, unusable for horseriders because of the volume of vehicular traffic it will attract onto the bridleway. At present there are no compensatory bridleway improvements or extensions for horseriders in the planning permission, and no provision of any facilities whatsoever for riders on this sports hub that is supposed to be going to provide new state-of-the-art sports facilities for the Borough. This is a serious missed opportunity, as there are now no longer any riding schools in Royal Tunbridge Wells where children and adults can learn to ride.

Q41. How does the scheme approved under planning permission Ref 21/00300/FULL relate to the proposed allocation, which is dependent upon the relocation of Tunbridge Wells Football Club from the Culverden Stadium (site allocation AL/RTW20)?

Perhaps if the Football Club does not relocate, the site could instead provide a new state-of-the-art equestrian centre, as the site is located on a public bridleway.

Q43. Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

No. Far from improving accessibility, it appears the proposal will worsen accessibility for horse riders unless a new public bridleway or riding area is created to compensate for the effect the proposal will have on High Woods Lane.

Q45. What 'localised widening and highway improvements' will be required to facilitate the proposed new stadium? Is High Woods Lane suitable for a new football stadium and sports hub?

It will not be suitable unless a modification requires a new bridleway to be dedicated to compensate for the effective loss of this end of High Woods Lane as a bridleway. Being a public bridleway High Woods Lane would be far more suitable as access to a new equestrian centre and riding area.

**Matter 7, Issue 2, Pembury  
Land Rear of High Street and West of Chalket Lane (Policy AL/PE1)**

Q3. Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Not unless a modification provides the amendments to the policy requested by the BHS in its response to the pre-submission consultation.

Q7. Is it clear to decision-makers, developers and local communities how applications for planning permission should 'consider' improvements to the cycle and bridleway network? What is required of development proposals?

It is not clear. This is vague wording designed to enable the development to go ahead without these improvements and it should be amended to require them, as requested by the BHS in its response to the pre-submission consultation.

**Land at Hubbles Farm and South of Hastings Road (Policy AL/PE2) Q15**

Q11. Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Not unless a modification requires the amendments to the policy requested by the BHS in its response to the pre-submission consultation.

Q15. Is it clear to decision-makers, developers and local communities how applications for planning permission should 'consider' improvements to the cycle and bridleway network? What is required of development proposals?

No it is not clear. This is vague wording designed to enable the development to go ahead without these improvements and it should be amended to require them, as requested by the BHS in its response to the pre-submission consultation.

**Land North of the A21 and South and West of Hastings Road (Policy AL/PE3)**

Q18. Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Not unless a modification requires the amendments to the policy requested by the BHS in its response to the pre-submission consultation.

Q21. Is it clear to decision-makers, developers and local communities how applications for planning permission should 'consider' improvements to the cycle and bridleway network? What is required of development proposals?

It is not clear. This is vague wording designed to enable the development to go ahead without these improvements and it should be amended to require them, as requested by the BHS in its response to the pre-submission consultation.

**Land at Downingbury Farm, Maidstone Road (Policy AL/PE4)**

Q22. How has the proposed area of residential development been established? What is it based on and is it justified?

The BHS is not qualified to judge whether the use of the area for residential development is justified, though we note that other objectors have argued that if other areas were developed at higher density it would not be necessary to take this area of countryside. However, taking the proposed access off Church Road, a narrow road used by horse riders for access to the countryside in Marshleyharbour Woods and to the bridleway bridge over the A228, is not justified, unless suitable new alternative means of safe access to these facilities is provided for horse riders.

Q24. Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

BHS Matter 7 contd

No, far from improving accessibility to green belt land, the proposed development will seriously damage access to the green belt countryside for horseriders, because of the added volume of vehicular traffic it will cause on Church Road.

**Matter 10, Issue 6, Rural Development and Diversification**

Q1. Does the Plan enable the development and diversification of agricultural and other land-based rural businesses, as required by paragraph 84 of the Framework?

Only if amended as requested by the BHS at pre-submission stage. Equine and equestrian businesses are important land-based businesses. They can include riding schools and coaches, livery yards, competition yards, trekking centres, breeders, trainers, welfare charities, veterinary services, farriers, feed merchants, tack, equipment and clothing manufacturers and retailers, shows and event services.

Q4. Does Policy ED6 support the sustainable growth and expansion of all types of business in rural areas, both through the conversion of existing buildings and well-designed new buildings, as required by paragraph 84 of the Framework?

The policy is possibly too restrictive, especially as regards equestrian businesses (some of which might equally fall within ED4, rural diversification, which appears to be a less restrictive policy). The policy should enable the decisionmaker to balance environmental and landscape protections (which most equestrians would support) with the health (including mental health), employment and economic benefits of equestrian businesses.