

September 30th, 2026

The Consultation Team.

Your Ref: 2026/48/92441/W**Applicant:** Kirklees Council**Location:** Meltham Greenway.

Proposed Public Multi-User Path on a Disused Railway Corridor.

Our Ref: 252/2026**Objection.****By E-mail:** DC.Admin@kirklees.gov.uk

Dear Sir/Madam,

RE: Proposed Public Multi-User Path on a Disused Railway Corridor

I am writing on behalf of the British Horse Society (BHS) in response to the current consultation on the Public Multi-User Path on a Disused Railway Corridor. The BHS is the largest and most influential equestrian charity in the country, working to improve the lives of horses and their owners through its four core foundations of education, welfare, safety and access.

1. BACKGROUND TO OUR COMMENTS

Nationally, it is estimated that there are **3.5 million people** in the UK who ride or who drive a horse-drawn carriage. We estimate that there are currently more than **87,000 horses** within the county contributing at least **£313 million each year** to the local economy, mainly through goods and services supplied by small businesses such as feed merchants, vets, farriers, trainers, saddlers, etc.

Road Safety is a particular concern to equestrians, who are among the most vulnerable road users. Research indicates however that only 1 in 10 incidents are being reported to the BHS; Over the **last ten years** (2016–2025):

- **19,528** road incidents involving horses have been recorded with British Horse Society
- **559** horses have died, and **964** have been injured — an average of **56** fatalities every year
- The number of fatalities recorded has risen from **21** in 2016 to **59** in 2025 — a **180%** increase
- **Eight** people have been killed, while **999** have been injured — average of **just under 100** people that are injured every year.

In 2025 alone, **59** horses have died, and **82** have been injured, **2,810** road incidents involving horses have been logged with British Horse Society

2,516 horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (*NHS Hospital Episodes Statistics*)

<https://digital.nhs.uk/data-and-information/publications/statistical/hospital-admitted-patient-care-activity/2024-25>

For horses. For people. For life.

The British Horse Society is an Appointed Representative of Howden Insurance Brokers Limited (Firm reference 309639) who are authorised and regulated by the Financial Conduct Authority.

Registered Charity Nos. 210504 (England and Wales), SC038516 (Scotland) and 1382 (Isle of Man).

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/our-work/safety/dead-slow> – we recommend taking a few minutes to watch the ‘Dead Slow’ virtual reality film for an impression of how vulnerable equestrians are in proximity to cars and lorries).

Because of the difficulties that equestrians encounter on roads, they avoid using them wherever possible. Road use is often unavoidable, however, sometimes simply because people have nowhere else to exercise their horses. The main off-road access available to them is the network of Rights of Way which is fragmented with gaps in the network. In shared use, we would like to see equestrians included in cycle schemes ensuring that horse riders are not left sandwiched between cyclists on their left and motor vehicles on their right. Grass verges must remain as an important refuge for horse riders.

a. Recognition of equestrians as vulnerable road users

Historically, pedestrians and cyclists have been considered as the main vulnerable road users. Equestrians are however increasingly recognised as being part of this group: during the Parliamentary Debate on Road Safety in November 2018 Jesse Norman, Under Secretary of State for Transport, stated that

“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.”

Inclusion of equestrians in the Active Travel Strategy

The term ‘Active Travel’ applies to journeys undertaken for a range of purposes, whether to reach a place of work or local amenities, or for recreation. It is also the case that many of the routes that are used to walk or cycle to work or school are the same routes which at other times provide for recreational use.

It is now acknowledged that horse-riding is as much an ‘active travel’ mode as recreational walking or cycling. At the recent Parliamentary Debate on Active Travel in Westminster Hall, Robert Courts MP proposed that ***“horse riders...ought to be thought about in the context of active travel as well.”*** This was endorsed by Michael Ellis, Minister of State for Transport, who confirmed that ***“Active travel includes horse riders and bridle paths – this debate includes them.”***

Cambridgeshire and Peterborough Council has defined Active Travel as “Physically active modes such as walking, or horse riding. It also includes walking or cycling as part of a longer journey.” (See [Cambridge and Peterborough report](#))

We therefore suggest that horse-riding should be included within the plan.

Equestrians to be included in any shared-use routes, wherever possible

In order to maximise opportunities within development to help provide more off-road links for equestrians, where shared-use routes are created for active travel as a part of any development, planning policy should support the automatic inclusion of horse riders on shared off-road routes, unless there are specific reasons why this is not possible.

Conflict with cyclists is sometimes given as a reason for excluding horses from shared routes, but this rarely has anything to do with either the horse or the bicycle, simply the inconsiderate person who happens to be riding one or the other. Horse riders and cyclists as two vulnerable road user groups have more in common with each other than differences. This is illustrated by the work that the BHS is doing in partnership with Cycling UK in the current ***‘Be Nice, Say Hi!’*** campaign and with Walk Wheel and Cycle Trust in their ‘Paths for Everyone’ initiative.

b. Reference to the Hampshire Countryside Access Forum (HCAF) guidance [Equestrians in Hampshire](#)

The HCAF has developed this guidance for planners and developers in response to feedback from local authorities, which indicated that they would welcome more information about how they can include equestrians in their work, engagement and consultation.

Written by members of HCAF with support from Hampshire Countryside Service and the BHS, this document has been widely circulated within and beyond Hampshire, sparking interest from other authorities outside the county.

We would urge the planners to incorporate the principles set out in this guidance into their planning policy: most particularly, **that equestrians should be considered and consulted with at an early stage within the planning of any major housing or infrastructure development.**

Horse riding is a year-round activity which (along with associated activities such as mucking out and pasture maintenance) expends sufficient energy to be classed as moderate intensity exercise. The majority of those who ride regularly are women, and a significant proportion of riders are over 45. For some older or disabled people, being on horseback or in a horse-drawn carriage gives them access to the countryside and a freedom of movement that they would not otherwise be able to achieve. There are also considerable psychological and social benefits from equestrian activities, as the BHS is demonstrating through the [Changing Lives through Horses](#) initiative.

CONCLUSION

Failure to accommodate the needs of these users would be contrary to National and Local Planning Policies such as:

TR8: Public rights of way.

1) Development proposals should:

- a) Protect and enhance the network of public rights of way, including through suitable diversions agreed with the highway authority; and
 - b) Take opportunities to extend, link or improve the quality of existing routes where this enables one or more of the following:
 - i) Improved access to green spaces and the countryside;
 - ii) New direct and circular routes and connections between local and long distance footpaths, bridleways and cycle routes;
 - iii) The provision of accessible connections with public transport stops and interchanges.
- *Defra circular 1/09 Rights of Way [1] advises that*
 - *7.1 Proposals for the development of land affecting public rights of way give rise to two matters of particular concern: the need for adequate consideration of the rights of way before the decision on the planning application is taken...*
 - *7.2 The effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered*

Document Specific. Reasons for Objecting.

Combined Planning Statements

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7. Access Considerations for all Users 7.1. The route is to be suitable for pedestrians, cyclists and accessible for wheelchair and mobility scooter users. There is demand for horse riding, but the current width is not conducive to provision for horse riding as currently proposed. The 3m of width of proposed surfacing will enable passing between cyclists and pedestrians as per guidelines in LTN -120 - see especially table 6-3 for sites with up to 300 cyclists per hour. Access controls will barrier access to cars: This is currently in existence at the picnic site entrance on Crosland Factory Lane and access restriction barriers to deter motorbikes are proposed at the other end at Fold Farm Lane.

We disagree with this finding that the usage will carry 300 pedestrians per hour and request the evidence base for this figure. Having lived in the area for over 40 years being a regular user of Meltham Greenway since its conception for walking cycling and horse riding, the usage has always been low. The recently published Rural Active Travel Guidance is being ignored horse riders are specifically included and they must be included in the new route being proposed.

<https://www.gov.uk/government/publications/designing-accessible-rural-active-travel>

Page 39:- Pedestrians, cyclists and equestrians When people walking, wheeling and cycling need to share routes with horses, additional width may be needed to ensure comfort and improve safety for all user groups and to enable different user types to pass each other. The bridleway network is fragmented and equestrian use of cycle tracks, footways or footpaths is not necessarily permitted and can be difficult. This means new traffic-free public rights of way which assist in extending or linking it together should normally be (or be converted to) bridleways or byways, or other types of route that permit equestrians. Horses are also permitted to use highway verges but they will need to be wide enough to form safe routes. Providing for equestrians may not require different provision from people walking, wheeling and cycling in terms of width or surfacing. A minimum desirable usable width of 3m can provide an acceptable level of service for all path users where overall user numbers are low and if there is also low equestrian use.

It is therefore unacceptable to exclude horse riders from the **“Proposed Public Multi-User Path on a Disused Railway Corridor”**

This is a link to an example of good practice where a greenway is quite rightly being made available for all users. [Press | Borderline Greenway](#)

The Trans Pennine Trail is a 215 mile long route from Southport to Hornsea this route includes horse riders. <https://www.transpenninetrail.org.uk/>

<https://www.transpenninetrail.org.uk/horse-riders/>

“The Trail is a multi-user route designed with equestrians in mind and provides a great way to explore the countryside – whether that’s just an afternoon hack or a journey across Northern England”.

The Trans Pennine Trail (TPT) Penistone to Kirkburton stretch is less than 3 metres wide in a lot of places following old pack horse routes.

The Hornsea rail trail is also fairly narrow in sections less than 3 metres forming part of the Trans Pennine Trail.

Kirklees Council has a duty of care to all user groups and if horse riders are excluded they are therefore forced to use the 'shared space' on the 50mph highway with HGVs putting them at greater risk.

Active travel includes horse riders as noted above. Active Travel funding must not be used to discriminate against any users including horse riders.

When the above matters have been satisfactorily dealt with and horse riders are included in the scheme we will remove our objection.

Should you have any questions or would like to discuss any aspect of this response further, please do not hesitate to contact me.

Yours faithfully

Access Field Officer – Yorkshire.