

Mr Jason Hawkes, Planning Officer

Horsham District Council

Via email [REDACTED] [\[REDACTED\]](#)

9th October 2025

Dear Mr Hawkes

RE: DC/25/1312|Hybrid planning application (part outline and part full planning application) Land West of Ifield Charlwood Road Ifield West Sussex

I am responding to this application on behalf of the British Horse Society, the UK's largest equestrian charity with over 126,000 members and representing the country's 3.2 million horse riders.

We object to this application. Whilst we acknowledge that this is a partly outline planning application, it is apparent that equestrians, vulnerable road users equal to cyclists, have been entirely disregarded.

There are over **24,000 horsesⁱ** passported to owners living in West Sussex, contributing **£169 million per annumⁱⁱ** to the economy, much of which is spent locally (vets, farriers, feed merchants, hay suppliers, etc.)

In 2024, The British Horse Society (BHS) recorded 3,118 road incidents involving horses, resulting in 58 horses being killed and 97 injured, along with 80 human injuries. The vast majority of these incidents, 81%, were caused by vehicles passing too closely or too quickly, despite the updated Highway Code guidance for safe passing. We know that these statistics are the tip of the iceberg in respect of the real numbers. NHS statistics indicate that in 2023/24 there were 2,493 hospital admissions for "Animal-rider or occupant of animal-drawn vehicle injured in transport accident"ⁱⁱⁱ. Further development such as this carries a moral obligation to provide some mitigation for the additional hazard and risk that additional traffic will inevitably bring to equestrians as well as other vulnerable road users.

National Planning Policy Framework

96. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities [...]

105. Planning policies and decisions should **protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users**, [...]

125. Planning policies and decisions should:

a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or **improve public access to the countryside**;

DEFRA Circular 1/09 Rights of Way¹

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...

¹ <https://www.gov.uk/government/publications/rights-of-way-circular-1-09>

7.2 The effect of development on a public rights 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.

West Sussex Rights of Way Improvement Plan

"Action Plan

4. "process diversions and extinguishments, **seeking enhancements and improvements** where possible"
8. Engagement with the planning process
 - Seek to positively influence access, including **proactively looking for PRoW gains for all NMUs (links and upgrades), affected by development:** (my emphasis)
 - **review and engage with planning applications/consultations affecting PRoW**

Horsham District Planning Framework

Policy 34 Cultural and Heritage Asset

7. Retain and improves the setting of heritage assets, including views, public rights of way, trees and landscape features, including historic public realm features;

Chapter 11: Infrastructure, Transport and Healthy Communities

- Community facilities and public rights of way and green recreation links contribute to Green Infrastructure provision. The delivery of Green Infrastructure in the plan will help to build healthy communities

For all of the reasons above (policies and statistics), equestrians should be included in public/ informal/ recreational/ active travel paths within the development and connectivity should be provided to neighbouring safer roads with suitable crossing points for all vulnerable road users for onward travel.

In the event that these facilities are provided, as a time constrained condition of planning permission and with due consultation with British Horse Society and/or Rusper & Newdigate Bridleways Group, the Society would be willing to consider removing its objection.

Yours sincerely

Sarah Rayfield
Access Field Officer – London & South East

cc Agent [REDACTED]
West Sussex PROW

ⁱ DEFRA FoI December 2024

ⁱⁱ BETA 2023

ⁱⁱⁱ <https://digital.nhs.uk/data-and-information/publications/statistical/hospital-admitted-patient-care-activity/2023-24>