

Powys Interim Development Control Guidance – Onshore Wind Farm Developments Consultation.

The Response of The British Horse Society:

1. The British Horse Society (BHS) represents the interests of the 4.3 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.
2. The equine industry is estimated to be worth £4 billion and to employ 150,000 people. The BHS is committed to promoting the interests of horse riders and owners and the welfare of horses and ponies through education and training.
3. The BHS works for safer on and off-road riding and carriage driving through an improved public rights of way network and seeking to create new opportunities of lawful off road riding and carriage driving. The BHS works in partnership with other user groups, local and central government to make rights of way useful and open to all. It has more than 200 access volunteers across the country working to achieve this objective, in both rural and urban areas.
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.
5. Aim 5 of the Strategy is to 'Increase access to off-road riding and carriage driving'.
6. The length of the public right of way network currently amounts to 33,000 km, 79% of which are footpaths, 15% of which are bridleways, and 6% of which are byways or restricted byways. Horse riders therefore, currently only have access to 21% of public rights of way network.
7. The Society's Policy in respect of separation distances from wind turbines to equestrian rights of way and roads is:-

'That as a starting point when assessing a site and its potential layout, a separation distance of 4 times the overall height should be the target for National Trails and Ride UK routes, as these are likely to be used by equestrians unfamiliar with turbines, and a distance of 3 times overall height from all other routes, including roads, with the 200m recommended in the Technical Guidance to PPS 22 being seen as the minimum, where it is shown in a particular case that this would be acceptable. The negotiation process recommended in PPS 22 should indicate whether, in the particular

circumstances of each site, these guidelines can be relaxed or need strengthening to minimise or eliminate the potential difficulties. Where the recommended separation distances cannot be achieved the Society will expect the developer to demonstrate:

- *How safety issues can be ameliorated by carrying out agreed works.*
- *Details of an alternative route that could be used by equestrians whose horses will not use the existing route because of the closeness of the turbines to the road or right of way.*
- *Details of the provision of funds to improve other rights of way, or to create new routes in the locality.'*

8. The Society recommends that the above policy be considered as a material consideration when determining applications for planning permission for large, medium and small wind farms.

9. Consideration of potential highway constraints and access issues in paragraph 6.4 of guidance must include consideration of any impact on equestrian rights of way and that the necessary separation distances of the turbines can be accommodated.

10. Developers should take into account the impact of their proposals on the wider community, namely the users of the rights of way that may be affected by such proposals. Users of the rights of way network are not confined to the local community but come from a much wider community – horse riders will often ride up to a ten mile radius from where their horse is kept. Equestrian tourism which is growing year on year in Wales means that riders will also come from much further afield.

11. When considering who to engage when engaging local communities it is important that developers consult the British Horse Society and other public rights of way user organisations so that due consideration can be given by the developers to any adverse impact that any of their proposals might have on the public rights of way network and any amelioration steps that may be required to offset any detriment.

12. In paragraph 10.2 reference to 'Highway Infrastructure improvements outside the application site' and 'Public access improvements' need to clearly include reference to the rights of way network.

13. Consideration of cumulative impact needs to include consideration of any cumulative impact on the wider public rights of way network. Preventing access to one route can cut off a much wider network to the horse rider thereby forcing them onto the road network.

14. The Society would like to receive confirmation that the Powys Sustainable Communities Investment Fund will provide for improvements to the equestrian public rights of way network.

15. Appendix 1 – Issues to be considered in preparing wind farm proposals – Location and siting should include an assessment of the impact of the

proposal on the rights of way network and any roads and clearly set out the distance between the turbines and any public right of way and road.

16. In considering the disruption during the construction period consideration needs to be given to the disruption that will be caused to equestrians if they cannot use the road and public rights of way network during the construction period and what alternative measures are going to be put in place to offset this.

17. An assessment of potential shadow throw/flicker on the road and public rights of way network, aswell as affected dwellings, needs to be given by the developer and the steps to be taken to offset any adverse impact.

18. In paragraph 9 of appendix 2 the word 'footpaths' should be deleted and the words 'public rights of way network' inserted.

19. The Society looks forward to receiving details of the Council's response to the objections that have been received to this guidance and any amended guidance that is issued.

18th July 2008.