



The British Horse Society response to Forestry England's Horse Riding Permit's Survey

The British Horse Society welcomes Forestry England's Horse Riding Permits Survey. For a long time the Society has argued that the public forest estate should provide free access to equestrians just as it does to walkers and cyclists. The Society maintains that the requirement for equestrians to obtain permits to ride/carriage drive in some forests is discriminatory, when such a requirement is not placed on walkers and cyclists as well.

Like walkers and cyclists, equestrians are vulnerable road users and need safe off road places to ride and carriage drive. In 2022 alone, 69 horses were killed on Britain's roads and 139 riders injured.

The Forestry England Estate extends to about 258,000 hectares of land which has the ability to provide more safe off road riding and carriage driving which is badly needed by the equestrian community.

It is understood that Forestry England manages over 250 sites, and that Forestry England is able to manage equestrian access to over 223 sites without the need for a permit. The Active Forest Programme operates at 18 of Forestry England's busiest sites yet only 2 of these sites require TROT permits for horse rider access. This means that 16 of the busiest sites are suitably managed without the need for horse rider permits.

In respect of those forests where equestrians are currently required to purchase permits we are not aware of any issues relating to public safety, or harm to any site, arising out of the use of the definitive bridleways and byways through those forests by legitimate users of those routes. It is therefore hard to see, how use of other routes within those forests by the same users would cause any issues, and why any concerns would be different in respect of those routes.

It is encouraging that Forestry England supports '*riding access and absolutely recognises the importance of providing safe off-road riding*'. However, Forestry England needs to recognise that a permit system works against those who cannot afford to purchase a permit, just as it would to those walkers and cyclists who would not be able to purchase a permit. A permit from the Toll Rides Off Road Trust costs £114 plus £16 hat band fee giving a total of £130 per person per annum. For a parent wanting to horse ride with two children, that equates to £390 per annum. For a parent wanting to take two children cycling in a forest that equates to £0.00 per annum. This is unfair and discriminatory.

The Society also questions why the fee is so high when a permit scheme can be run charging a family rate of £30 per annum for access to Hodgemoor Woods in Buckinghamshire.

The annual permit system also discriminates against those who wish to ride or drive occasionally in one or more of the forests.

No permits are required in Scotland, access is free to recreational users. There will be the same management issues in Scotland as there will be in England, especially in respect of those forests that are easily accessible from major conurbations.

Comments on the consultation document

1. The consultation document states that *'For some of the more sensitive sites, we operate horse riding permit systems, to enable access while minimising harm and risk to public safety'*. If this statement is suggesting that horse riders / drivers are a risk to other members of the public, it should be noted that walkers, cyclists and horse riders share many public paths (bridleways and byways) and public open spaces without recorded incidents and accidents caused by them. The Camel and Monsal Trails are good examples of such paths. We see no reason why the same is not true in Forestry England forests where many of the tracks are much wider than many bridleways.
2. One set of questions within the consultation is preceded by the comment: *'The following questions look to capture the demand for riding / carriage driving at Forestry England woodlands and how riders/carriage drivers travel to the woodlands. This will help us to understand the importance of horse access to the woodlands and support future decision-making.'* The importance of horse access to woodlands by equestrians should not be evaluated numerically. If an equestrian lives near to a woodland, then regardless of the numbers of other equestrians who might or might not use that woodland, it will be of immense importance to them.
3. Another set of questions is precluded by the statement: - *'There are some woodland blocks and specific areas within woodland blocks, which are not suitable for unmanaged horse access. Some places are more sensitive and vulnerable to harm, so need greater protection and management over access. There are also areas where the soil type and terrain make the ride network prone to significant poaching (damage to vegetation and soil caused by trampling in wet conditions). Also, some places have many more visitors or experience challenges with unmanaged horse-riding access, such as some of our forest centres or smaller woodlands. Managing these areas keeps everyone safer and allows a greater variety of people to enjoy the forests.'*

The Society fails to understand why if *'some places are more sensitive and vulnerable to harm, so need greater protection and management over access'* why the same does not apply to the exponentially higher number of walkers and cyclists who will use those sites. Likewise, if *'there are also areas where the soil type and terrain make the ride network prone to significant poaching (damage to vegetation and soil caused by trampling in wet conditions)'* why those areas are not prone to *'significant poaching'* by the exponentially higher number of walkers and cyclists who use those sites. Especially when on the Hodgemoor Woods website it states *'The Forestry Commission acknowledges that cycling contributes to the deterioration of the trails in the woods.'* Likewise, why are there no such challenges with unmanaged cyclists and mountain bikers, and if there are no challenges why are they provided with designated trails in such places, which they are not required to pay for? The Society has no objection to sensitive sites or areas being out of bounds, whether at all times or in certain conditions as appropriate, but this should apply to all users, not just

riders, as the damage caused by the greater numbers of feet and wheels in poor conditions can cause more damage than the much lesser number of horses.

4. The Society does not understand the statement '*Permits allow Forestry England to manage rider/carriage driver access in sensitive forests and woodlands where the alternative could be no equestrian access at all*' when the same does not apply to walkers and cyclists. The Society is also concerned that this statement evidences some predetermination of the outcome of the survey, and that Forestry England has not approached the survey with an open mind.
5. The statement '*We, Forestry England, need to use horse riding/carriage driving permits across most of our forest districts*' also evidences predetermination of the issue.

The number of cyclists has increased dramatically over recent years yet, they are encouraged to visit Forestry England sites. Cyclists can cause soil erosion and damage to paths, they have been involved in accidents, but they don't have to pay for access, they don't have to take out insurance, they don't have to display their identity for the public to see – this is not equitable when compared to equestrians who are required to have permits.

The Society believes that:

- a) Informal access on horseback, by horse drawn carriage, on foot and on bicycle should be free in forests where public access is permitted.
- b) Forestry England should not discriminate against equestrians when providing informal public access to forests.
- c) Access to the forests is especially essential for equestrians, as horse riders have access to only 22% of the public rights of way network and carriage drivers to only 5%.
- d) There is no justifiable reason to exclude equestrians from forest tracks on the unproven grounds that they can cause more damage than walkers and cyclists on well used routes. Where damage is caused by walkers and cyclists, maintenance is carried out to improve routes for them to use, at no cost to them.
- e) Contributions for maintenance of routes for informal access should not be sought from equestrians when these are not sought from walkers and cyclists.
- f) Equestrians should be able to access Forestry England woods on equal terms with walkers and cyclists.

Dated 6th April 2023.

Mark Weston,

Director of Access, Safety and Welfare,

The British Horse Society,
Abbey Park,
Kenilworth,
Warwickshire,
CV8 2XZ.