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From: [REDACTED]
Sent: 21 July 2026 10:21
To: OxfordshireSRFI
Subject: Oxfordshire Rail Freight - TR050008
Attachments: holding objection - Oxford rail freight .pdf

Follow Up Flag: Flag for follow up
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Categories: CM, Awaiting Response, Additional Submission

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Dear Planning Inspectorate Case Team,

Please find attached a formal representation submitted on behalf of the British Horse Society (BHS) regarding the Development Consent Order application for the Oxfordshire Strategic Rail Freight Interchange (PINS Reference: TR050008).

I must sincerely apologise for this submission arriving shortly after the 19 July deadline. I had fully intended to submit our response on Friday, but unfortunately, I had to take some unexpected leave. I very much hope you are still able to accept and formally record our comments, given the significant impact these proposals will have on the local public rights of way network.

As detailed in the attached document, the BHS has substantial concerns regarding the proposed permanent severance of definitive bridleways, the downgrading of routes to permissive status, the specification of surfacing materials for multi-user tracks, and the need for robust, physical segregation between equestrians and heavy plant traffic during the multi-year construction phases. We are also seeking proportional mitigation funding within the Section 106 agreement to offset the resulting network fragmentation.

Thank you for your time and understanding. Should you require any further clarification on the points raised in our objection, please do not hesitate to contact me.

Yours faithfully,

[REDACTED]

[REDACTED]
Access Field Officer - South
[REDACTED]

British Horse Society,
Warwickshire CV8 2XZ

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15 July 2026

The Planning Inspectorate
c/o QUADIENT, 69 Buckingham
Avenue, Slough, SL1 4PN**RE: Holding Objection – Application TR050008 - The Oxfordshire Strategic Rail Freight Interchange and Highways Order 202****Location: Land adjacent to the Chiltern Main Line Railway, southwest of Junction 10 of the M40 motorway, Oxfordshire**

I am writing to submit a Holding Comment to the above Nationally Significant Infrastructure Project (NSIP) application. These comments are submitted for and on behalf of the British Horse Society (BHS); local representatives may also submit responses.

The British Horse Society is the UK's largest equestrian charity, representing the nation's 3.2 million riders and carriage drivers. Nationally, equestrians have access to just 22% of the public rights of way network, while carriage drivers are restricted to a mere 5%. The fragmented nature of the rights of way network frequently forces these vulnerable road users onto busy carriageways in order to reach safer, off-road links.

Economic Value of the Equestrian Industry

The equestrian industry generates £5 billion consumer spending per year and on average, £6,887 per horse (BETA 2023) is contributed to the economy.

Information obtained from DEFRA in December 2024 recorded the following statistics for equines in the immediate and wider vicinity:

Location	Recorded Equines	Annual Economic Contribution
OX27	562	£3,870,494
Oxford and Bicester	2,878	£19,820,786
Oxfordshire	21,957	£151,217,859

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The local area supports several riding centres and livery yards that generate significant employment and sustain essential equine services, including veterinary surgeons, farriers, and feed merchants, as well as instructors and grooms. These businesses and their clients rely heavily on both the local highway network and the off-road public rights of way in this vicinity.

Social Value of the Equestrian Industry

Beyond its direct economic impact, the equestrian sector serves as a vital national wellbeing resource, delivering an estimated £1.2 billion in social value annually (British Equestrian, 2025) across the UK. This value is generated through measurable improvements to physical and mental health.

Equestrian activity is uniquely inclusive, offering significant therapeutic benefits to neurodivergent individuals and those with disabilities—providing 500 neuromotor inputs every five minutes at a walk—while also reducing costs for public services by addressing issues such as anxiety, depression, and social isolation.

The proposed development threatens the very foundation of this social value: safe and accessible off-road spaces. Without protected access to bridleways and riding hubs, the substantial health, educational, and community benefits that horses provide to the local residents will be permanently diminished.

While cycling is frequently prioritised in active travel planning with infrastructure tailored to its primary user groups, equestrians represent a demographic—predominantly women over 40—whose specific requirements for safe, off-road connectivity are often overlooked in the design of sustainable transport networks.

BHS National Statistics: Road Incidents Involving Horses

The following data represents road incidents involving horses and riders logged with the British Horse Society during the 2025 reporting period:

- **Total Incidents:** 2,810 road incidents involving horses were reported to the BHS.
- **Horse Fatalities:** 59 horses died as a result of road incidents.

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- **Horse Injuries:** 82 horses were injured.
- **Human Injuries:** 86 people sustained injuries.
- **Abuse and Road Rage:** 22% of riders reported being victims of road rage or abuse.
- **Driver Passing Distance:** 78% of incidents occurred because a vehicle passed too closely to the horse.
- **Driver Speed:** 83% of incidents occurred because a vehicle passed too quickly.

The BHS estimates that only one in ten road incidents is officially reported. Consequently, the figures above represent only a fraction of the actual risks faced by equestrians. Providing off-road links, such as those proposed below, is essential to mitigate these documented dangers and protect vulnerable road users from high-speed traffic.

Policy Framework and Statutory Guidance

The British Horse Society emphasises that the current application must be determined in accordance with national planning policy and statutory guidance, which prioritise the protection and enhancement of the rights of way network.

National Planning Policy Framework (February 2025)

Paragraph 105 states:

‘Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.’

Planning Practice Guidance (PPG)

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The guidance on *Open space, sports and recreation facilities, public rights of way and local green space* (Paragraph: 004 Reference ID: 37-004-20140306) confirms:

‘Public rights of way form an important component of sustainable transport links and should be protected or enhanced. The Defra Rights of Way circular (1/09) gives advice to local authorities on recording, managing and maintaining, protecting and changing public rights of way’

Defra Rights of Way Circular (1/09)

The BHS draws particular attention to the following sections of the Circular:

- **Paragraph 1.5:** *‘In many areas, rights of way help to boost tourism and contribute to rural economies. They can also provide a convenient means of travelling, particularly for short journeys, in both rural and urban areas. They are important in the daily lives of many people who use them for fresh air and exercise on bicycle, on foot, on horseback or in a horse-drawn vehicle, to walk the dog, to improve their fitness, or to visit local shops and other facilities. Local authorities should regard public rights of way as an integral part of the complex of recreational and transport facilities within their area’*
- **Paragraph 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...’*
- **Paragraph 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.’*

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The Requirement for Connectivity and Safety

Network Fragmentation

Multi-user routes and public rights of way are essential for all vulnerable road users, including equestrians, cyclists, pedestrians, and those using mobility aids. The existing off-road availability in this local area is fragmented and limited. This lack of connectivity leaves equestrians with no viable alternative but to use the public highway.

Local and Strategic Impact

Local equestrians will be directly affected by the outcome of this application, and the impact will extend to the wider regional network. The protection of current links and creation of new is vital to address this fragmentation and to provide the safe, off-road access mandated by the policies cited above.

Grounds for Objection:

1. Severance and Downgrading of Definitive Rights to "Permissive" Status

The BHS would like to express strong concern regarding the permanent stopping up of definitive public rights of way as detailed in Schedule 5, Part 1 of the draft Development Consent Order (dDCO), specifically affecting Public Bridleways 109/28, 109/29 (part), 109/30, and 109/26 (part).

The application proposes to replace these definitive routes with "permissive shared use cycle tracks" running through the estate road network (under Requirement 9). Permissive status does not carry the permanent, long-term statutory protection of a designated public right of way, which could leave equestrians vulnerable to future access changes. Furthermore, Schedule 5, Part 2 permanently extinguishes a section of Public Bridleway 109/29 with no substitute provided. We would like to see all re-provided peripheral routes legally dedicated as permanent Public Bridleways to ensure long-term network security.

2. Equestrian Safety Risks from Major Infrastructure and Heavy Plant Traffic

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The introduction of a major freight hub southwest of Junction 10 of the M40 will inevitably generate immense volumes of HGV traffic. While Schedule 9, Part 4 introduces an Environmental Weight Limit, Article 20(2)(b)(iv) permits broad exemptions for vehicles "gaining access to or leaving any land or premises situated in or adjacent to the restricted roads". This suggests that heavy industrial traffic could still intersect local lanes like Somerton Road and Ardley Road, which local stables heavily rely upon.

Additionally, we note that the Construction Environmental Management Plan (CEMP) framework (Document 6.2C) could be strengthened regarding equine-specific safeguards. Phased earthworks spanning multiple years (Years 1–4+) will occur directly alongside active hacking networks. The BHS requests that the HGV Routeing Strategy (Requirement 24) and all subsequent P-CEMPs incorporate a complete physical separation, including acoustic and visual screening, between heavy construction activity and public bridleways to minimise the risk to users.

3. Protection of Connectivity During Multi-Year Construction Phases

Under Article 13(2), the applicant is restricted from closing any PRow until an alternative route is provided to the satisfaction of the local highway authority. However, as construction across the development plateaus is slated to persist across a multi-year master programme, there is a risk of temporary "disconnects" where active riding paths could become dead ends for extended periods.

We would like to see a binding "No Net Loss of Connectivity" provision integrated into the final DCO. Any temporary diversions should be fully constructed, clear of heavy machinery, safely surfaced, and properly signposted before the corresponding existing definitive lines are affected.

4. Surfacing of Multi-User Routes and "Cycle Tracks"

Within Schedule 5, Part 3 and other sections of the dDCO, new and substitute routes are frequently classified as "Cycle Tracks". We are concerned that routes designed primarily for bicycles are often finished with hard, sealed materials (such as tarmac). These surfaces can be dangerously slippery for equines and lack the necessary shock absorption for safe riding. We would like to see a formal commitment ensuring that any shared-use route expected to accommodate equestrian traffic is constructed with an equestrian-safe surface in accordance with BHS guidelines for multi-user routes.

5. Lack of Equestrian Infrastructure Funding in the Draft Section 106 Agreement

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The draft Development Consent Obligations (Section 106 Agreement, Document 3.4) currently allocates funding towards local authority mitigation, including a £3.26 million Bus Service Contribution and a £200,000 Weight Limit Signs Contribution.

Despite the physical impact and alteration of the local bridleway network caused by this development, there currently appears to be no funding allocated to the preservation or enhancement of equestrian access. To help offset the impact of network fragmentation, we would like to see a dedicated Equestrian and Non-Motorised User Infrastructure Contribution included in the agreement to fund the upgrading of local connecting footpaths to bridleways.

Conclusion:

The British Horse Society is currently unable to support this application. The proposed de-registration of definitive equestrian rights, the downgrading of public routes to permissive statuses, the introduction of heavy transport hazards, and the lack of clarity on appropriate surfacing all pose significant concerns for vulnerable road users.

We respectfully ask the Examining Authority and the Secretary of State to consider withholding development consent unless the applicant amends the DCO and Section 106 obligations to secure continuous, permanently dedicated off-road bridleways, provides equestrian-safe surfacing, implements strong construction-phase equine protections, and offsets network fragmentation via dedicated infrastructure funding.

Yours faithfully,


Access Field Officer South
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