Icknield Greenway Traffic Regulation Order – Formal Consultation
Officer comments on key parts of British Horse Society representation

This provides officer commentary on the key parts of British Horse Society (BHS) representation, including the additional information submitted. The BHS' full response is attached to this document.

This additional information was not available at the 'informal' consultation stage and is relevant with regard to the limitations and other aspects of driven horses and the precautions that are applied by carriage drivers to ensure their, and other's safety.

Key points identified by BHS and officers

a) The design and use of carriages and horses mean that speeds above 15kmh are not likely and most slopes and bridges are traversed at walking pace. This minimises likelihood of collision and erosion
b) Carriage-drivers are accompanied by a groom who will reconnoitre the obstacle before using it and who can act as marshall to warn the driver to stop, or others
c) The most commonly-used carriages are fitted with brakes
d) The weight, height and length of smaller horse and carriage or pony and trap can be accommodated within the design tolerance of the bridge if there are legal restrictions to weight and width and accompanying physical restrictions. A legal restriction to 0.5t and 1.4m width would cover many common carriages whilst negating other impacts
e) There is no engine noise associated with carriages, nor are fast starts possible
f) No person or organisation's representation cites driven horses as having caused or causing an issue

Summary

The additional information supplied by the BHS and others gives a reasonable justification for a partial removal of the proposed restriction on carriage driving from the proposed Traffic Regulation Order, providing that technical assessments support this and that overall project delivery timescales and costs are not significantly impacted. This use is unlikely to cause any great concern for other NMUs nor impact on levels of use and doesn't materially change the purpose of the TRO consultation.

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Key BHS points and associated OCC officer comment

1. We assume that the '*constructed sections'* of the route refers to the new bridge to be constructed over Ginge Brook. We understand that the bridge is to be 2m wide with a 1 in 8 gradient and span around 20 metres. A gradient of 1 in 8 is quite suitable for a competent horse drawn carriage driver to drive up and down. A width of 2 metres can accommodate horse drawn carriages which are often just under 1.5metres wide but it should be noted that, for ridden horses, BHS advice on

Bridges, fords, gradients and steps [2] specifies a minimum width of 3m for a bridge over a watercourse with a span greater than 8m for all routes.…….

OCC officer comment: The bridge will be 2.5m wide to meet environmental, topgraphical and engineering/cost constraints and be as accessible as possible – with departure from standard to accommodate this width. The constructed section includes crossing and the access slopes.

2. With respect to weight, the weight of a horse drawn pleasure carriage is surprisingly low[3] at under 200kg. With 2 persons on board (say 70kg each) plus the weight of one horse (say 500kg), the total weight would be 840 kg. A large ridden horse weighs in the region of 700kg. With a rider of say 70kg, this gives a total weight of 770kg. It is likely that more than one ridden horse could be using the bridge at any time, unless restrictions are put in place, because some horses will require a lead from a confident horse over the bridge. Thus we see no reason to prohibit carriages on the grounds of weight.

OCC officer comment: The weight information is useful. By itself it isn't justification to change TRO but it is when combined with design speed, shared specification with ridden horses, use of grooms and lack of noise. Limiting access to the smaller and lighter carriages mean that little design and engineering alterations are anticipated – although project delivery impacts are a factor.

3. **(1)** ***for avoiding danger to or preventing the likelihood of danger to persons using the byway*****.**
   The Society does not agree that horse drawn carriages are a danger to others using the byway for the following reasons:

   a. Horse drawn carriages are most unlikely to be travelling at more than 10mph, a speed probably less than a cyclist.

OCC officer comment: This low design speed is a key factor.

4. ***(2) for preventing damage to the byway.***
   The Society does not agree that horse drawn carriages will damage the byway. The weight of a horse and carriage used for recreational purposes (see above) is unlikely to damage the proposed surface. Secondly, a horse drawn carriage moves off slowly from rest. It is little different to a ridden horse moving from a halt or a bicycle moving from a halt.

OCC officer comment: This very low of speed standing start is a key factor

5. (3) ***for facilitating the passage of non-motorised traffic*****.**
   The Society does not agree that the removal horse drawn carriages will facilitate the passage of other non-motorised traffic. The number of horse drawn carriages using the route is likely to be low. If, in the future, the route should become heavily used by carriages and their presence shown to impede other traffic, then the Society might agree to a TRO to restrict carriages. It should be noted that horse drawn carriages provide access to the countryside for those who cannot, or for those who can no longer, walk, cycle or horse ride for any distance.

OCC officer comment: This use of driven horses and carriages for enabling accompanied disabled access by itself is noted

Responses to OCC email of 9th September seeking clarification.

- With regard your point 1 'increasing amount of carriage driving' in the area, do you have evidence of any carriage driving use of this route please?

*a) Suppressed use as discussed in our reply on 9th Sept. Not only have the natural features of the slope and brook deterred carriage driving, the present bridge (at 1.5m**e**tres width) was not built to cater for them. In addition, there has been a physical obstruction (a large log) at the western end at the road from Ardington for many years.*

OCC officer comment: The current bridge was installed at the request of the BHS in the early 1980s. We are aware of temporary defensive structures used to prevent criminal activities. No Carriage Driver has reported these as obstructions

b) *Carriage driving takes place in the area. The large Bury Down car park on the Ridgeway National Trail is a popular place for carriage drivers to start a drive because it is spacious (see attached photo 1362). This is within 6 km of the Icknield Way with a minor road and a restricted byway connecting the Icknield Way to the Ridgeway. Construction of an improved bridge over Ginge Brook will open up this route for carriage driving, as well as improving the situation for walking, cycling and horse riding. To leave out a lawful user group discriminates against this user group which badly needs better access to the countryside before it is written out of the countryside altogether.*

To further emphasize the value of carriage driving in the area, the Paralympic Legacy Access project (http://www.bhs.org.uk/advice-and-information/safety-advice-and-information/carriage-driving/plap) promotes PLAP route 13 from Bury Down car park. We believe that this, plus the well maintained nature of the Ridgeway and associated byways without obstructions, is encouraging carriage driving in the area, as would opening up of the Icknield Way.
OCC officer comment: The use of Bury Down as a start point for carriage drivers is noted

Please note that we consider that it would not be representative to conduct a survey over a specific time period (as done by WSP) to try to determine the precise numbers of carriage drivers using this area because carriage driving use is sporadic at the present time and thus such a survey would not be representative. However, social media sites show that the area is being used for carriage driving.

We ask that these reasons are included in the report to the Cabinet to avoid bias in favour of cycling, or carriages are not included in the TRO.
OCC officer comment: The point about sporadic and low levels of use is noted

- Can you confirm if BD29/17 (Design Manual for Roads and Bridges – Special Structures) has provision to accommodate carriage drivers….?

BD29/17 refers to equestrians. The Society uses the term 'equestrians' to cover horse riders and carriage drivers. Presumably Highways England does too. Oddly, BD29/17 refers throughout to footbridges but covers standards for cycling and equestrians.

Where byways and restricted byways are specified, those specifications should include carriage driving as they are equestrians who are legally allowed to use these rights of way. However, if you have concerns on specific specifications, the Society is always pleased to work with local authorities to improve advice on equestrian issues as mentioned in its advice note.

If Oxon County Council highway engineers feel there is a gap in the available specifications, then it may be necessary to set up a working group. However, construction of a new bridge on a byway cannot be a novel situation nationally. We are looking for examples.
OCC officer comment: The offer to work to improve standards is noted

- Can you explain what, if any, braking mechanisms are fitted to a 'typical' carriage to control rate of descent please? If none, what is the mechanism by which a carriage can be stopped in mid-descent?

There is no need to worry about braking. Four wheel carriages, the most common type of carriage, have brakes! There are as many styles of brake as there are carriages. Modern carriages are built to exacting designs for competition, road use and safety, which is paramount. Some vehicles come with brakes all round, plus turntable brakes, some come with just rear brakes. The harness has a "breaching strap" which passes around the horses quarters halfway between the hock and the point of the buttocks. The horse "sits" into this when being driven downhill, effectively braking the vehicle. This can be used on its own, mostly on two wheeled carriages (but these are not often used on byways) but it is much more common to be used in conjunction with a braking system. If there is a need to stop going downhill, the brakes are applied and the horse(s) stopped. The horses hold the carriage back while the driver keeps the foot on the brake.
OCC officer comment: The detail of braking and control systems on carriages is noted

- Can you confirm that BDS or RDA includes public rights of way with steep gradients like this to be 'safe' for lone or accompanied disabled riders using carriages please?

  A 1:8 gradient is not considered particularly steep but responsible carriage drivers would survey a route first without a carriage to determine if it was suitable for their level of expertise, as might a horse rider. Carriage drivers tend to be cautious people as they are responsible for a precious animal and carriage.

  Good practice dictates that the carriage driver is accompanied at all times by a 'groom', that is, a person who alights from the carriage when necessary while the driver remains on board. Those who take disabled people into the countryside in carriages will pick a suitable route, again dependent on their level of expertise, and will be accompanied.

  British Carriage Driving is the governing body for the sport of horse driving trials, a competitive arm of carriage driving. Trials test the skill of the carriage driver and are held on private land with purpose built obstacles, rather like Badminton Horse Trials & Blenheim Horse Trials for ridden horses. British Carriage Driving does not concern itself with carriage driving on public rights of way.

  One of the BHS Access officers, who is a carriage driver herself, has been in contact with the carriage manufacturer […] Fenix Carriages (https://www.fenixcarriages.co.uk/carriages/ who has said that if Oxford CC wish to contact him direct to discuss weights and dimensions of carriages then he would be happy to speak to them. Mark is a very well known in the carriage driving world as he makes carriages and refurbishes the old coaches. He may be able to help with point loading. Another retailer is Hartland Carriages https://hartlandcarriages.co.uk/ but we understand they import their carriages.
  OCC officer comment: The information about gradients and weights is noted

  We wonder if part of the problem is a lack of awareness of the specifications of modern day carriages used to access public rights of way. They are not the stage coaches as often seen in TV period dramas!

  A couple of photos are attached of carriage drivers who live locally. We ask that one or both of these photos are included in the papers to go to the meeting on the 10th with a caption of 'A typical carriage used for countryside access, 1.5metres wide approx. and approx. 200kg in weight (without horse & driver)'. These are the sort of carriages used for countryside access often by older people, as seen in the photos, who may have some mobility issues.
  OCC officer comment: The photos are a useful visual guide to modern carriages. It is clear that some of the larger carriages with more than one horse would necessitate greater width and weight provision for the crossing and slopes which would create negative impacts. This means some restriction is considered necessary in order to provide some level of accessibility but without extra engineering, costs and environmental impacts.

A typical carriage used for countryside access, 1.5metres wide approx. and approx. 200kg in weight (without horse & driver)
caption and photos supplied by BHS

Carriages at Bury Down car park on the Ridgeway