

From: sue turner [REDACTED]
Sent: 14 April 2023 07:16
To: EED Forward Planning
Subject: LDP consultation comments

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Rhybudd: E-bost allanol yw hwn ac nid oedd yn tarddu o'r Cyngor. Byddwch yn ofalus wrth glicio dolenni neu atodiadau agoriadol. Pan fyddwch yn ansicr, defnyddiwch y botwm 'Report Message'.

Please consider my comments below to include equestrians in the LDP plan as currently they are vulnerable and excluded.

1. Equestrians are officially classed as vulnerable road users and need provision to keep them safe which is not being adequately assessed currently. Carmarthenshire is predominantly rural and has a high horse population.
2. Equestrians are not being included as active travellers on AT routes in Carmarthenshire so they require suitable parking space so they can transport horses to safe places to ride. Currently we are restricted by height and length in many council carparks. The LDP is not addressing current or future needs of equestrians. Where safe sites exist, riders feel unsafe riding to the site and often cannot park there.
3. Risk assessments for equestrians are not adequate when planning Active Travel improvements and alternative options are not provided for them where traffic/population growth is planned. This is evident in Cross Hands where there is significant development and a high horse population. Developments could require access suitable for horses but instead offer only shared use paths.
4. Equestrians are not positively included in any policy other than the Rights of Way Improvement Plan. They have been marginalised because they do not fit into any single portfolio. Their needs span, rural affairs, tourism, transport and leisure business areas and touch on others and risk assessments are not realistic if they are included at all.
5. The highway hierarchy to prioritise resources is discriminatory because although it places bridleways as a priority, there are very few of them; these do not connect and vehicular routes like unsurfaced highways, and byways provide essential parts of an equestrian network which are "no priority" under the hierarchy. This essentially makes it impossible to get to the bridleways on horseback because they are not kept open or maintained.
6. The LDP makes considerable reference to walking and cycling with projects and funding and policies referring to Active Travel and The Well Being and Future Generations Act. The LDP needs to allocate space and facilities for the same movement of equestrians, for local riders and tourists, where there is a significant interest in travelling a trail by tourists and access to local beaches, forests and parks. Removing all legal issues and opening all of the 165km kms of bridleway in the county will not provide sufficient access for the 22,000 horses residing here or the visitors that come on horseback because the routes are fragmented. This is a tourism opportunity that is not being realised and that could improve the local economy.
7. Many horse riders and carriage drivers are older people who have disabilities due to age. They are predominantly female and using a horse is a sustainable method of transport to access the country side for health and well being. Many would not be able to access the countryside otherwise, due to heath limitations but the lack of facilities for them in a rural county needs addressing.

8. Pembrey- There are specific issues relating to inadequate parking for horse transport to access the beach, other rights of way, and the forestry for permit holders. Equestrians are also refused access to the Pembrey Park and Millennium Coast Park despite significant land available and development for others that could incorporate horse use. There should be provision for all residents on the peninsular and this is a very popular place for horses given the all weather sandy surfaces and numerous byways and other access opportunities.

9. Gwendraeth Railway- proposals to develop this line for walking and cycling do not include horse use despite historic use of the old railway corridor and other railway corridors that have already been made active travel routes and equestrians excluded. The excuses for lack of inclusion name the cost and inability to obtain the land required to make these routes wide enough. This needs addressing by policy as bridleways are the original Active Travel routes open to all non motorised users and are 3m wide. Cyclists were granted access to bridleways in 1968 so there should be no objection to horses sharing cycle paths.

10. Tywi Valley Path- This is being developed as a leisure route and has attracted leisure funding but horse riders are not being included on it. If the Authority is insisting that horse riders are predominantly leisure users and do not fall under Active Travel funding then any leisure funding should incorporate equestrian access in order to satisfy the improvement of equestrian access. The ROWIP contains reference to the lack of equestrian access in the county, but the Authority is not making reference to positive steps in the LDP to do anything to retain past/present access had by horses and is more importantly not creating safe access for the future either on or off road. This means current and future needs of horse riders are not being met under the Well Being and Future Generations Act. Parents are not willing to risk the lives of their children by teaching them to ride on the road and this is affecting the numbers of children being able to ride at a young age.

11. Equestrians should be included in all road schemes under Government road safety legislation but the new link road built at Cross Hands has done nothing to improve the safety of equestrians accessing Llyn Lech Owain- where parking for horses has been denied- or Mynydd Mawr Woodland Park. Access is denied to a roadside cycle path and the grass path apparently provided is substantially inadequate and unusable.

12. As horse riders are not "Transport" in TAN18 there is insufficient assessment of their needs within local communities under planning of any sort. There may not be bridleways in the locality but there are horses so the road needs to be safe for them as well as walkers and cyclists. Making a quiet lane much busier will affect the route used by horses as does crossing of busier roads. This can be achieved by allocating sufficient land to accommodate them where horses are living, where there are equestrian facilities like riding clubs and livery yards or resident horses or equestrian businesses. Safe access both on and off road to where they want to go, like beaches, forests, parks and bridleways/byways is also a necessity and making sure that provision for others is not compromising safety of horse riders.

13. Horses are mentioned as leisure users briefly in TAN 16 in association with walking and cycling in relation to access to facilities. This needs to be more robust in the LDP as walking and cycling is being addressed under active travel but horse riders are not. Much of the reason given for not sharing routes, is lack of space to accommodate. Segregation is not always the best arrangement as it encourages fast moving cycles and lack of respect. This should be thought about on a case by case basis depending on expected numbers of users.

14. TAN 16 Sport Recreation and Open Space 2009 mentions horses in the following context but the mention of horse riders and carriage drivers has little mention in the current plan to support the need for facilities for equestrians as leisure users, raised in the ROWIP.

2.6 In order to encourage walking, cycling and horse riding and other low carbon modes of travel which can help tackle climate change, particular attention should be given to

opportunities to use disused railway corridors and canal towpaths to provide local and long distance routes and to enhance and extend linear open space corridors, including circular routes which can help reduce equestrian use of roads. This reference to horses is not robust enough to get adequate assessment or inclusion of horse riders needs for the future under Well Being and Future Generations Act.

3.42 The LDP should also consider the potential for extending and enhancing local and long distance recreational routes for walking, cycling and horse riding. This reference to horses is not robust enough to get adequate assessment or inclusion of horse riders needs for the future under Well Being and Future Generations Act.

4.12 Local planning authorities should seek to promote and provide better facilities for walkers, cyclists and horse-riders, including people from ethnic minorities, disadvantaged and disabled people. This reference to horses is not robust enough to get adequate assessment or inclusion of horse riders needs for the future under Well Being and Future Generations Act.

Mention is made under RD5 Equestrian facilities but refers to manage provision and not access to communities or greenspace, social inclusion or health and well being and leisure facilities.

15. Since the submission of the Deposit LDP, horse riders have been officially classified as vulnerable road users under the Wales Road Safety Strategy. There has also been changes made to the Highway Code and a hierarchy of users with equestrians shown as vulnerable as cyclists. There should therefore be a significant reflection of this in the LDP to assist in safeguarding horseriders through planning and development to give them as much protection from danger on the roads as other vulnerable road users. ie walkers and cyclists.

16. Equestrians rely heavily in Carmarthenshire, on road links to get to bridleways, byways and unsurfaced roads. Unfortunately unsurfaced roads used for leisure are at the bottom of the “highway hierarchy” for resources meaning they have no priority for maintenance but form important links in Equestrian circular routes that link bridleways. Byways and other vehicular routes subject of a traffic regulation order to prevent vehicular use, receive no maintenance for decades and become obstructed, falling between the Highways Dept and Countryside Dept for responsibility. This has a significant effect on equestrian access.

17. Active Travel routes that include cycles, using public rights of way need to be made truly multi user by being awarded bridleway or restricted byway status to preserve access for all. Any development should include access opportunities for all users, not just walkers and cyclists so links within the community are accessible to all to obtain best value for public money. If this is not feasible then alternative routes are required for horses.

Horse riders are not considered under TAN18 as transport for consideration in planning applications and although the planning system requires equestrians to be considered and included in risk assessments as road users, in reality, this is not effective consideration. There is insufficient inclusion of equestrians in the LDP and it doesn't go far enough to provide safe on and off road opportunities for the equestrian community or protect them when planning road schemes and active travel improvements. There are more than 22,000 registered/passported horses in the county. Nationally equestrian routes form 22% of the rights of way network but in Carmarthenshire its less than 7%. There needs to be a much more positive and active statement to provide land and development for multi user routes that include horse riders and carriage drivers.

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