

Simon Clement

From: Karen Burch [REDACTED]
Sent: 23 June 2026 08:11
To: EED Forward Planning
Cc: Karen Burch
Subject: Re: Cynllun Datblygu Lleol Diwygiedig Sir Gaerfyrddin (CDLI) 2018-2033 / Revised Carmarthenshire Local Development Plan (LDP) 2018 – 2033
Attachments: CPO statement-of-reasons-TVP.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

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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'.

All

I dont think the added words are robust enough to protect equestrian access to the countryside under SP12, which I have commented on previously.

A recent FOI request to CCC asking about equestrian consultation both for Active Travel and other communication under general planning, provides insufficient action or consideration of equestrians and the resulting decisions create a barrier for us to access our off road networks due to changes in the road network, development, and Active Travel routes. The Planning System only allows the Rights of Way Team to comment on actual rights of way, not how we access them and there are no other Statutory consultees that speak for us. We cannot teleport to our bridleways and green space. The FOI request reply confirms that comments by equestrians are not recorded at scheme level because we are not considered active travellers. In order to ensure that we have a voice, particularly about our safety when roadside paths are created or off road routes, it is necessary to include that we should not be worse off from a scheme that is designed to make improvements for other users.

How is CCC identifying whether equestrians are already using a route highlighted for AT improvement or whether there is demand to be included in any scheme, as per ATAG guidance below? The current public consultation process is not robust enough to conform to the guidance below and something needs to be added to the LDP SP12 to ensure that we are not put at risk on roads we have legal right to use and informal off road paths (railway lines) that we currently ride. More is needed to identify routes that we currently use and where there is demand for safe off road links in our ever shrinking network within our community because roads are now too dangerous to ride.

section 1.3.6:

“Equestrianism is overwhelmingly for leisure purposes rather than as a mode of transport as it rarely displaces a car journey. Forms of equestrian travel (horse riding, carriage driving, pony and trap etc.) are not considered forms of active travel. However, in delivering the provisions of the Act, local authorities should be aware that equestrians are vulnerable road users and should not

restrict equestrian access to routes that they currently enjoy. Bridleways can be used by equestrians, walkers and cyclists and so may form part of an active travel route. Enhancements to bridleways should not impede equestrian use or require them to use a less safe route instead. In some cases, it may be more appropriate for all users if separate provision is made for walkers, cyclists and equestrian users. Where active travel routes are planned on an alignment for which there is also high demand from horse riders, the feasibility of accommodating them should also be assessed."

8.2.10:

"Effective consultation at network and scheme level needs to target both current and potential users of walking and cycling infrastructure. Whilst the focus of active travel engagement will be upon utility journeys, these routes may also be used for leisure and sports purposes, including equestrians in rural/semi-rural areas and so this should be borne in mind when targeting who to seek input from during the engagement and consultation process."

11.32.5:

"Equestrians should not be denied access to routes that they currently have the right to use by changing the classification of the rights of way. There needs to be clear signing of which routes are intended for use by equestrians. If widths permit, a separate unsealed surface may be preferable for equestrians."

**Attachment re Towy Valley Path where equestrians robustly attended consultations and requested access to this route but there is no mention of equestrians in the Statement of Case.*

Regards
Karen Burch
BHS Volunteer

Communications below.

Correspondence 1 FOIA/20122

From: FOIA <[REDACTED]>
Sent: 30 April 2026 10:44
To: Karen Burch [REDACTED]
Subject: FOIA/20122

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Dear Ms. Burch

I refer to your request for information, which was received on 20th April, 2026 and has been dealt with under the Freedom of Information Act 2000/EIR 2004.

The specific information you requested was contained in the email below.

In response:

1. How are responses by equestrians to Active Travel schemes recorded.

Scheme specific feedback from equestrians is not recorded but is considered and responded to at the time of enquiry.

2. How are responses from equestrians , both on and off road, recorded.

All responses to the Active Travel Network map are stored in a database. Scheme specific response approach is outlined above.

2a How are equestrians consulted for Active Travel projects as detailed in guidance on the Act.

Equestrians are not considered to be Active Travel users. Active Travel is defined as walking and cycling for purposeful journeys (utility) which includes travel to work, school, shops, leisure facilities, transport interchanges etc to which a route for active travel excludes those purely for recreational use (with the understanding that uses of Active Travel routes can also be recreational). Taken directly from 1.1.4 of the Active Travel Guidance – ‘However, such usage is secondary; active travel resources should only be invested in routes likely to produce modal shift and/or improve conditions for existing active travel users.’

In terms of consultation, whilst they are not considered as a key stakeholder in majority of cases under AT, we do not and never have excluded equestrians from submitting feedback on a scheme, whether it be online or in person as it is understood that any individual/organisation/group can attend and have the opportunity to feedback AT schemes. With regards to surveys that aid consultations for example, the language used and how they are framed are typically towards walkers, cyclists, wheeling and scooting - horse riding is not specified given that they are not considered/classified as AT users. However, this does not stop them from commenting as there is typically a section that offers other comments for example.

**3. What criteria is used to assess risk of inclusion
A to equestrians**

We recognise equestrians as vulnerable road users and our duty is to ensure that any scheme we develop and implement should not make it any worse for existing designated equestrian routes but are not bound to enhance Active Travel schemes to include provision for them either.

B to other users

Other users are considered on a similar basis.

if they are included in a scheme and if they are not included.

4. How many responses have been recorded from equestrians since 2019 on projects attracting Active Travel funding.

As mentioned previously responses to the Active Travel network map are recorded but feedback from non-key stakeholders to Active Travel scheme specific feedback is not.

Yours sincerely

Tîm Llywodraethu Gwybodaeth | Information Governance Team

Gweithrediadau a Llywodraethu TG | ICT Operations & Governance

sirgar.llyw.cymru | carmarthenshire.gov.wales

Correspondence 2

Ein cyf / Our ref: TO-MH-05070-26

Dear Karen Burch

Thank you for your email to the Welsh Government. We have been asked to reply.

Equestrians are rightly recognised as vulnerable road users and their safety and continued access to the countryside is an important consideration.

Under the Active Travel (Wales) Act 2013, the primary focus is on enabling everyday journeys, such as commuting, accessing services, and education, to be undertaken by walking, wheeling and cycling. For this reason, equestrian use is not formally classified as ‘active travel’ within the legislation and is rarely used as a mode of transport. However, our Active Travel Act Guidance (ATAG) is clear that local authorities must take account of equestrian users when planning and delivering active travel schemes.

ATAG explains that:

- Equestrians should not be disadvantaged by active travel interventions, and access to routes they currently use should not be restricted or removed.
- Where bridleways form part of, or connect to, active travel networks, improvements should not require equestrians to use less safe alternatives.
- Where there is known demand from horse riders, the feasibility of accommodating equestrian use should be considered as part of scheme design.
- Engagement on new routes should involve a broad range of users, including equestrians, particularly in rural and semi-rural areas
- Clear signage and, where appropriate, provision of separate surfaces can support safer sharing of space between user groups.

While delivery of individual schemes sits with local authorities, they are expected to follow guidance on inclusive engagement and to consider the needs and feedback of all relevant users.

While there are currently no plans to redefine equestrian activity within the Active Travel Act itself, there is ongoing emphasis on ensuring that active travel infrastructure does not create unintended barriers for other users and that vulnerable groups, including equestrians, are taken into account in scheme design and delivery.

Yours sincerely

Y Strategaeth Drafnidiaeth a Chynllunio / Transport Strategy and Planning
Llywodraeth Cymru / Welsh Government

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.