

**From:** Karen Burch [REDACTED]  
**Sent:** 13 April 2023 23:21  
**To:** EED Forward Planning  
**Cc:** Helen Donnan  
**Subject:** Response to LDP Deposit Plan 2023  
**Attachments:** BHS Road Safety stats.jpg; bhs stats Carmarthenshire\_06.10.09.xls; bridleways Carms.docx; horse numbers1 copy.pdf; wales bridleways copy.pdf; wales footpaths copy.pdf

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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'.

Dear All

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 car parks. 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 health 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 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. 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 LDP to support provision of 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.

18. 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.

Comments on Policy in blue below

The previous LDP referred to

*5.5.13 The need to develop a plan which optimises the opportunity for the delivery of an efficient, effective, safe and integrated transport system is recognised. In this respect, the strategy aims to co-ordinate land use to:*

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*Reduce the need to travel, particularly by private motor car, through promoting accessibility to public transport facilities;*

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*Promote, support and enhance alternatives to the motor car, such as public transport (including park and ride facilities and encourage the adoption of travel plans), cycling, walking and **opportunities for horse riding where***

**appropriate;**

“Where appropriate” is not robust enough to provide for equestrian needs. There are no stats regarding horse numbers being used to assess where horses are or where they want to go and there is no criteria for when something is appropriate. This needs clarifying. There is data available under horse passports/microchip database held by DEFRA and BHS equestrian statistics and police statistics.

There is a need for links to bridleways and byways for horses, walkers and cyclists and to allow horses to travel safely to off road facilities so they do not need to transport horses in vehicles. Where horse parking is not provided, there should be inclusion on AT routes both off road and road side paths. The LDP does not acknowledge the needs of equestrians particularly in developing towns like the Cross Hands area where there is a high horse population even though comments are made on planning consultations.

### **Policy TR3 Highways in Developments - Design Considerations**

The design and layout of all development proposals will, where appropriate, be required to include:

**a) An integrated network of convenient and safe pedestrian and cycle routes (within and from the site) which promotes the interests of pedestrians, cyclists and public transport; Horses not included**

b) Suitable provision for access by public transport;

c) Appropriate parking and where applicable, servicing space in accordance with required standards; **Equestrian parking**

d) Infrastructure and spaces allowing safe and easy access for those with mobility difficulties;

e) Required access standards reflective of the relevant class of road and speed restrictions including visibility splays and

design features and calming measures necessary to ensure highway safety and the ease of movement is maintained and where required enhanced;

f) Provision for Sustainable Urban Drainage Systems to allow for the disposal of surface water run off from the highway.

**Proposals which do not generate unacceptable levels of traffic on the surrounding road network and would not be detrimental to highway safety or cause significant harm to the amenity of residents will be permitted Where quiet lanes provide a circular route or a link to a bridleway or byway, alternative provision needs considering for local equestrians. This is currently not happening. There is no thought to horses accessing safer routes or horses using the roads in semi rural areas like Cross Hands.**

Proposals which will not result in offsite congestion in terms of parking or service provision or where the capacity of the network is sufficient to serve the development will be permitted. Developers may be required to facilitate appropriate works as part of the granting of any permission.

### **Policy TR4 Cycling and Walking**

Land required to facilitate the following improvements to the cycle network will be safeguarded. Proposed routes where known are shown on the proposals map. **The potential opportunity for horse riding should where appropriate be**

**considered.**

a) Towy Valley (between Llandeilo and Carmarthen); This is being built as a leisure route yet horse riders are still barred from using this off road path. We are being told that we are leisure users but are not getting any access improvements on new leisure

routes either.

b) Whitland to Llanglydwen;

c) Ammanford to the Amman Valley. This is a highly populated horse area with riding clubs and equestrian facilities. Inclusion in land allocation needs to be more robust to provide for local equestrians.

**Developments should, where appropriate seek to incorporate, or where acceptable, facilitate links to the cycle, rights of way and bridleway network to ensure an integrated sustainable approach in respect of any site.**

**This walking and cycling policy puts bridleways in the frame for an increase in walking and cycling traffic but because they are so few and there are no alternative routes for horse riders, we are being pushed off the only routes we have away from traffic without us being offered additional alternative routes.**

### **Policy TR6 Redundant Rail Corridors**

Development proposals which do not prejudice the re-use of redundant rail corridors for potential future recreational and rail development purposes will be permitted.

Strategic Objective Supported:

SO7, SO8, SO10, SO11 and SO12

This policy should be read in conjunction with other relevant policies and proposals of this LDP.

6.5.24 The Plan area has a number of former railway lines which offer considerable benefit for recreational activities including cycle routes, footpaths and bridleways. Consideration also needs to be given to the potential future re-use of rail routes when considering proposals which may impact upon the continuity and availability of the route.

**Because of the lack of official bridleways, horses have used redundant rail corridors to make links in the local network. Access to horse riders is not currently happening on routes that have used informally and are now being turned into Active Travel routes. They are being referred to as recreational routes but CCC are not providing access to horses on these routes.**

## **6.9 Recreation and Leisure**

6.9.1 Open space has the potential to provide benefits to health and wellbeing and can assist in mitigating the causes and effects of climate change. Open spaces can also provide arenas for social interaction and community activities, and have a key role to play in underpinning other key strategic documents, such as the Health, Social Care and Well Being strategy. In this regard, the protection and enhancement of provision represents a key consideration for the LDP.

6.9.2 Along with open space, policy REC 1 also recognises the key role of allotments, particularly in terms of developing community cohesion and also as an acknowledgment of the future issue of food security. Whilst seeking to promote

allotments, their future management is governed by specific legislation (see PPW: Edition 4)

6.9.3 Locally distinctive evidence underpins the Plan's policies in respect of open space. The Carmarthenshire Greenspace Study provides an audit of provision based upon national standards and guidance (including the

C.C.W green space toolkit and the N.P.F.A. Six Acre Standard) as well as local information on locally significant

provision sourced from the local community and/or Authority officers. It should be noted that there may be locally significant provisions that are not formally recognised in the Greenspace Study, or on the proposals/inset

maps, that make an important contribution towards open space and therefore 'local knowledge' should also be

considered when determining the significance of these spaces to the local community. The study provides a spatial context in terms of accessibility to provision and provides some useful definitions of open space.

For the purposes of the LDP, open space includes: natural green space, play space and public open space, in

accordance with the guidance issued within TAN 16.

The Greenspace study project standards are the ones to which the County is working towards, with the 2.4ha per

1000 N.P.F.A standard adopted. It should however be noted that the LDP is seeking to facilitate betterment in terms of accessibility to open space, and therefore an aspirational standard of 2.8 ha per 1000 is included within the Plan's monitoring framework. The study also provides a spatial appreciation of where there are potential deficiencies and surpluses in provision across the County.

6.9.4 Clear national guidance in respect of this topic is contained within PPW: Edition 4: Tourism, sport and recreation and TAN 16

: - Sport, Recreation and Open Space. Consequently, the following matters do not require LDP policies as they are

adequately covered by the aforementioned national guidance:

- Golf courses;
- Allotments, cemeteries and church yards;
- Major sporting and recreation facilities;
- Off road recreational vehicles.

6.9.5 Additional national development management policy statements may also be found in the above guidance, including such issues as impact of floodlighting and amenity concerns. In terms of leisure and recreation, reference should also be made to SP16 which confirms the Plan's emphasis on protecting, and wherever possible enhancing, the sustainability and vitality of the County's recreation and leisure facilities in accordance with the settlement framework. Whilst being covered by legislation by virtue of the C.R.O.W. Act 2000, rights of way also play an integral role in enhancing health and well being and their role (alongside that of footpaths and informal connectivity corridors) should be considered within the context of the LDP. Assisting in improving access to Carmarthenshire's attractive coastal areas is an important consideration for the LDP, however any development proposals should not be in conflict with Policies EP4 and EP5.

The above reference to leisure and recreation opportunities does not specifically mention equestrian needs and its inference in the policy does not suggest that equestrians are being adequately considered as "predominantly leisure users". (this phrase is routinely used in responses by the council when we are asking for inclusion on Active Travel routes so it would be expected that equestrians would be robustly included in any leisure and recreation policy and the LDP.) Forestry, beaches and parks are important sites for lawful safe off road riding and the limited rights of way network for horses means that these sites are attracting increased equestrian traffic as riders are looking for off road places to ride that they can also park at. Parking of horse transport is required if access to these sites is on a busy A road or requiring negotiation of roundabouts, fast moving traffic or other hazards.

I have included the following items of supporting evidence.

1. Horse numbers for Wales - from the National Equine Database 2012 produced from passports registered to horse owners registered to a Carmarthenshire address.
2. BHS stats Carmarthenshire 2009- breakdown of passported horses by post code area

3. Bridleways Carms- map of registered bridleways which are not all available for use.
4. Wales bridleways copy- Countryside Council for Wales map of registered bridleways in Wales/Carmarthenshire.
5. Wales footpaths copy- comparison CCW map of registered footpaths in Wales.
6. BHS Road Safety stats- 2021/2022 for Wales showing doubling of issues.

Regards

Karen Burch

