

Local Development Plan comments by Karen Burch ref 3370

<https://www.carmarthenshire.gov.wales/media/qxu0s13j/appendix-12.pdf>

Representations made

Well-being and Sustainable Development, 4.12 4629

11.Policies 5490, 5493, 5943(some placed here by the Authority from response to leisure and recreation, when should be more relevant to placemaking.)

SP17-Transport and Accessibility 5940

TRA2 Active Travel 5941

TRA4 Redundant Rail Corridors 5942

Questions

17.How will the Plan maintain and enhance the County's tourism, culture and leisure offer?

The plan needs improvement to support equestrian tourism, culture and leisure. This LDP should support the aims of the Equestrian Strategy in respect of planning. The Equestrian Strategy document is currently in draft and imminently going out to consultation with the Local Access Forum and forms part of the ROWIP.

18.Has the Plan had regard to the requirements of the Well-being of Future Generations Act (Wales) 2015 with regard to the well-being goals and ways of working?

Sustainable development is not meeting the needs of equestrians or complying with the requirements of the Act because due regard is not being shown for equestrians in the community when assessing the impact of development on the community. This includes new road schemes like the Cross Hands Link Road where the benefit of inclusion on the roadside cyclepath has not been recognised in providing links to off road riding space at LLyn Lech Owain Country Park. Decisions being made are negatively affecting the future of equestrians in Carmarthenshire. There is no support to preserve access to the community for those equestrians who are using rights of way and the roads to move around their community. Development, including cycle paths and new road schemes bring increased traffic with horses expected to cope with heavier traffic when other vulnerable road users are provided with off road Active Travel routes. Provision is being made for walkers and cyclists but equestrians are being marginalised due to the interpretation of Active Travel Guidance and this is negatively affecting the equestrian numbers as the roads are too busy to encourage parents taking children out to ride. Horse riding is sustainable active travel. Prior to Active Travel, policy mentioned vulnerable road users being

walkers, cyclists and horse riders but since the Active Travel Act requirements, equestrians have been dropped with safer routes in communities provided only for walkers and cyclists. This creates social exclusion as riders cannot get to meet friends on horseback as access to the road network is limited to certain times of the day or days of the week in busy areas.

21. Does Policy RD5 provide an appropriate framework for assessing proposals for new equestrian facilities?

No, equestrians need more than stables and menages. We require access to green space, parks, beaches and forests without needing to take to private transport. Where off road paths are not available and traffic is a deterrent, we require suitable parking facilities at locations we ride ie beaches, parks and forests and where there is off road access to the countryside. Public parking areas generally restrict high, long or heavy vehicles so suitable parking is a barrier to tourism and leisure activities. Other infrastructure like leisure shared use paths are also excluding equestrians which could provide long distance trails for equestrian tourism or at least give the required links to bridleways.

Sustainable Transportation and Accessibility

11. Does Policy SP17 provide a clear and consistent framework for the integration and co-ordination of sustainable transport measures and land use planning? and

are the requirements of Policy TRA2 clearly expressed and consistent with national planning policy?

a) How will the provision of car parking be managed?

A more robust acknowledgement of equestrians using the transport network is required and due regard made to them as members of the community. Road safety is not relevant to the plan but provision of infrastructure that is preserving and enhancing opportunities for a healthy lifestyle and health and well being is. See below.

Response to my original comments:

Noted. Welsh Government Active Travel Guidance (July 2021) Paragraph 1.3.6. This recognises equestrianism as overwhelmingly for leisure purposes rather than as a mode of transport as it rarely displaces a car journey."

Refer to Criterion b) of policy TRA2 of this Revised LDP which, in contributing to the delivery of the Councils duties under the provisions of the Active Travel (Wales) Act 2013, recognises the contribution that Improvements, connections and/or extensions to PROW which specifically includes Bridleways can have. Indeed, the policy encourages incorporating them within the site, and/or through financial contributions delivery off-site provision. Whilst the Plan seeks to recognise and make provision for improvements, connections and/or extensions it is not its role as a land use planning document to identify new networks (including safe off and on road networks) unless specifically identified elsewhere. Such matters are outside the remit of the Plan and

would be considered through other forms of guidance, plans or strategies. In this respect the Plan in its preparation has had regard to other Plans and strategies as well as national planning guidance in developing its content and particularly the Rights of Way Improvement Plan noting the interrelationship of the Plan area's footpaths, bridleways and bye-ways and linked leisure opportunities.

- <https://www.gov.wales/active-travel-act-guidance> The Authority has not quoted the full extent of relevant guidance in its response and the omission is very relevant. LDP need to support and encourage the Authority to have due regard to equestrians when considering planning applications.

Equestrians are mentioned under 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.”

Comments on incorrect interpretation of the above guidance

Carmarthenshire have adopted the approach that equestrians cannot be included on Active Travel routes unless they are segregated (requiring 5m width) which is outside the guidance and is resulting in discrimination and loss of access/useful links for an equestrian network. The 5m width is never available and too costly as it is not available from Active Travel funding. The LDP needs to allow for land use to allow this extra width in this case or allow for land to provide parking for equestrian transport close to sites/countryside locations if they

cannot be safely ridden to. The Authority are not complying with their duty under the Active Travel Act in respect of equestrians and we are being displaced from routes we have used and being marginalised.

Carmarthenshire are not consulting equestrians adequately as to demand/where they go or links needed in the community in any policies. What assessments have been done under leisure that include equestrian needs?

Active Travel Consultation is targeted at walking, cycling and scooting and survey questions are not geared towards equestrian response, making response difficult if not impossible particularly when they are only providing statements to choose from.

Although equestrianism is stipulated as a leisure activity, this is not reflected in the Leisure Strategy which is heavily weighted towards sporting locations ie leisure centres and sports facilities which do not include equestrian sports. Leisure routes are being created that equestrians are excluded from. The Towy Valley Path- a leisure path to be created under the Cycle Tracks Act- with equestrians permanently excluded. Creation of Cycle Routes under the Cycle Tracks Act will have a negative effect for equestrians when the incorrect status of some rights of way are investigated for correction as acknowledged in the ROWIP.

Movement around the community and connecting rights of way for equestrians is not reflected in other policy. The equestrian rights of way link to roads and development sites affect the ability to access these rights of way, usually because of increased traffic or traffic type making equestrians feel unsafe. The LDP could reference improvement/preservation/provision of access to community green space (parks, forests, beaches) in **Wellbeing and sustainable Development 4.12**

There is mention of widths and separate unsealed surfaces for horses in the Design Manual but this is not mandatory and horses can make use of paths created for shared use without any additional expenditure in many cases. National guidance for Active Travel Act is not being followed in respect of equestrians and it would be an enabler if the LDP integrated more effectively with the ROWIP to support improvements for all non-motorised users, not just walkers and cyclists. There is no protection afforded to the few bridleways available and Active Travel references in policy specify that these can be used as part of Active Travel schemes but without including equestrians on the non-bridleway sections. This negatively affects equestrians, taking something without giving anything back as a benefit.

Since COVID, the desire by equestrians to follow a historic trail has increased significantly with the need for accessible routes across the county where accommodation can be provided for both horse and rider therefore requiring additional spend compared to most tourists. This is an untapped source of local income as riders cannot carry all they need for their horse on the journey and it will need to be sourced locally. Quiet lanes and safe shared use links are needed to create an equestrian network and to attract equestrians to the stunning countryside of Carmarthenshire for an extended visitor season. Access to Active Travel routes will go a long way to providing these in many areas.

Reply to the Local Authority Response to my comments

The response to my original comment from the Authority states :

1. Criterion b) of policy TRA2, in contributing to the delivery of the Councils duties under the provisions of the Active Travel (Wales) Act 2013, recognises the contribution that Improvements, connections and/or extensions to PROW which specifically includes

Bridleways can have. Indeed, the policy encourages incorporating them within the site, and/or through financial contributions delivery off-site provision. This provides supporting evidence of my point and doesn't negate it. The reference acknowledges the inclusion of bridleways for the benefit of Active Travel for walkers and cyclists only and does not create bridleways as links to public rights of way for the benefit of equestrians or provide an alternative to local roads where development has increased traffic on minor roads they would use.

and

2. Whilst the Plan seeks to recognise and make provision for improvements, connections and/or extensions it is not its role as a land use planning document to identify new networks (including safe off and on road networks) unless specifically identified elsewhere. I understand that LDP doesn't cover road safety but policy should address the impact of development on all residents. I seek a more robust recognition and provision in the LDP to drive better engagement, and assessment of equestrian's needs as members of the community in what is predominantly a rural county and where horses still exist on urban fringes and in rural villages, which are negatively affected by development and new road schemes, without the required consideration being afforded to them under current planning guidance/policy. The Cross Hands area has a healthy population of equestrians yet no provision is being made to retain access to the few rights of way available or to address the impact of business development on their movement to LLyn Lech Owain Country Park when providing the Cross Hands Link Road as an example. Horses are not included on the road side cycle path when this leads directly to the Country Park and requests were made during consultation.

And

3. It is also not the role of the Revised LDP to deal with matters such as charging to access to other areas, restricted use or road safety. All such matters outside the remit of the Plan and would be considered through other forms of guidance, plans or strategies. In this respect the Plan in its preparation has had regard to other Plans and strategies as well as national planning guidance in developing its content and particularly the Rights of Way Improvement Plan noting the interrelationship of the Plan area's footpaths, bridleways and bye-ways and linked leisure opportunities. Due regard has not been made as evidenced in the responses to my comments to the plan. When building housing estates and other large development sites, access and travel within that community is subject of s106 provision. Paths created for walkers and cyclists should also be available for horses as should access to green space and countryside. Assessments of community needs and access to greenspace has not historically included horse riders, just walkers. This needs addressing. **SP12 Sustainable Places and Placemaking-PSD3 should include reference to improvements for equestrians.**

And

4. The policies of the Revised LDP makes specific reference and provision for equestrian activities in accordance with national policies.

Which National policies include positive consideration for equestrians and where in the LDP is specific reference made in planning or other policy, outside of the Rights of Way Improvement Plan?

Response to the Authority and Inspector:

There is a lack of provision for equestrians on Active Travel routes and the result of this exclusion means equestrians will take to private transport to move their horse to safe areas to ride when they would not have done so previously. This is occurring more regularly as paths and open space are being given to active travellers without equestrians. This gives negative modal shift.

The Rights of Way Improvement Plan acknowledges the lack of equestrian rights of way and the significant number of routes with incorrect status recorded. An Equestrian Strategy is being created to improve the access afforded to equestrians in the county which is less than 7% of the network when the national average is 22%. This is currently being drafted and will be in being by the end of 2024. Due regard should be referenced within the LDP to support this strategy where relevant to planning.

END