

## Appendix 3 Comments and responses

Ref.	Comments	Response
<b>Ref. 1</b>	<b>Trail Riders Fellowship</b>	
	<p>The Trail Riders Fellowship object to the proposed TRO on the following grounds:</p> <p>1. The Authority has not made its case that the road is unsafe for motorcycle traffic. No discernible reasoning is provided in the Statement of Reasons. The report to the Executive Board Member Decisions Meeting For Technical Services held on 27th November 2015 contains no demonstration of reasoning as to why motorcycle use of the road may be dangerous to the extent that a restriction is justified.</p>	<p>1.1 In 2015 the County Council advertised its proposals to introduce a prohibition of driving order for this way, with exemption for use by motorbikes. There was a strong consensus in the responses to the consultation that motorbikes could pose a risk to the safety of pedestrians using the way and be harmful to livestock, in fields adjoining the way, and environmentally damaging to the fields accessible from the way. Based on the responses to the advertised proposals the County Council determined that motorbikes should be restricted from using the way.</p>
	<p>2. The Order operates to prohibit use by invalid carriages, quadricycles, and horse drawn vehicles. No reasons are provided for banning those classes of vehicle.</p>	<p>1.2 Appendix 4 of the report provides the outcome of a site risk assessment of this way undertaken in 2014. The assessment concludes that the topography of the terrain along sections of the way is too steep to allow four wheel vehicles to pass safely.</p>
<p>3. The road can safely accommodate responsible motorcycling by members of the Trail Riders Fellowship. There are no safety improvements to be gained by banning members of the Trail Riders Fellowship from motorcycling on the road. To do so is unreasonable and irrational.</p> <p>The Trail Riders Fellowship respectfully request that the proposed Order is modified to provide further exemptions for:</p> <p>i. Invalid Carriages. ii. Motorcycle use that is subject of prior written authorisation by the Trail Riders Fellowship and which is being undertaken by a member of the Trail Riders Fellowship.</p>	<p>1.3</p> <p>i) The topography is extremely steep along sections of this way. It is considered unsafe to allow invalid carriages to use the way.</p> <p>ii) An exemption for a specified organisation to use motorbikes on this way may prove difficult to enforce. Motorbikes may cause alarm and distress to pedestrians on the way and to farm animals on fields adjoining the unfenced sections of the way.</p>	
<b>Ref. 2</b>	<b>A member of the Carmarthenshire Byway User Group</b>	
	<p>“I would like to formally object to the above proposed prohibition of driving order.</p> <p>As a member of the Carmarthenshire Byway User Group I was asked to look at this route along with officers from the Council to discuss the</p>	<p>2.1 In 2015 the County Council advertised its proposals to introduce a prohibition of driving order for this way, with exemption for use by motorbikes. There was a strong consensus in the responses to the consultation that motorbikes could pose a</p>

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	<p>possibilities for management of the route.</p> <p>I agreed with the previous proposal to prohibit 4 wheeled vehicles from using this route on the grounds of safety but cannot agree with the new proposal to prohibit all vehicles (except cyclists) from using this route.</p> <p>It was deemed at the meeting with officers that if the route was still regarded as 'safe' for cyclists and horse riders to use then there was no reason why 2 wheeled mechanically propelled vehicles (motorcycles) could also use the route safely.</p> <p>The County Council considers that the proposed prohibition of driving order is considered necessary on the grounds of 'Road Safety'.</p> <p>As this is the only reason stated I can not agree to this proposal as this reason is not relevant to motorcycles, which could still use the route safely.</p> <p>I would also like to remind you that a similar situation occurred on Byway 8/21 a few years ago when the route originally had a prohibition of driving order to all vehicles excepts cyclists placed on it. This was subsequently changed to a Prohibition to all vehicles except cyclists and motorcycles following objections from members of the public on the grounds that if the route was safe for horses and cyclists it was also safe for motorcycles. As Carmarthenshire County Council has previously agreed that if a route is safe for cyclists and horse riders it is also safe for motorcycles I cannot see how you can allow this proposal to go ahead in its current form.</p> <p>I would still support a prohibition of driving order for this route but motorcycles would need to be included as an exempted group."</p>	<p>risk to the safety of pedestrians using the way and be harmful to livestock, in fields adjoining the way, and environmentally damaging to the fields accessible from the way. Based on the responses to the advertised proposals the County Council determined that motorbikes should be restricted from using the way.</p> <p>In the responses to the 2015 consultation exercise concerns were raised that the fields and livestock would be vulnerable to abuse by motorbikes.</p>
<p><b>Ref.3</b></p>	<p><b>Chair, Carmarthenshire Local Access Forum (LAF)</b></p> <p>The consensus of those members that have replied is that the LAF is not in support of excluding a user group from a route because of requests from the landowner(s) or from local people.</p> <p>The LAF would only support exclusion of groups if the route was</p>	<p>3.1</p> <p>In 2015 the County Council advertised its proposals to introduce a prohibition of driving order for this way, with exemption for use by motorbikes. There was a strong consensus in the responses to the consultation that motorbikes could pose a risk to the safety of pedestrians using the way and be harmful to livestock, in fields</p>

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	<p>deemed as unsafe for that group to use. Hence the reason why we would support the exclusion of 4x4's from using the route as per the original TRO.</p> <p>The LAF does not feel that this TRO is appropriate for the route and would request that the inclusion of motorbikes be removed and that they be exempted from the TRO.</p>	<p>adjoining the way, and environmentally damaging to the fields accessible from the way. Based on the responses to the advertised proposals the County Council determined that motorbikes should be restricted from using the way.</p> <p>In the responses to the 2015 consultation exercise concerns were raised that the fields and livestock would be vulnerable to abuse by motorbikes.</p>
<b>Ref. 4</b>	<p><b>Carmarthenshire Riders Group</b></p> <p>If it's suitable for the landowners along the route to use with a 4x4 or tractor then it's suitable for the public.</p> <p>Also it's a location that could be built on and the one part by the chapel that is at a challenging angle, could be improved to allow safe access. The landowner could very well get his TRO and then improve the access point as an access road to a new property. If this point is made safe will the public then be allowed to use it.</p> <p>It is suitable for motorbikes but has it been assessed for horse drawn carriages which are also vehicles.</p>	<p>4.1 The main use of fields accessed along section of the way is for agricultural purposes. The surface of the way adjoining the fields is unsealed and on a steep gradient. The order grants exemption for residents (those who have an interest in the land) to use mechanically propelled vehicles to access the way. This will ensure that the future use of the way will be consistent with its history. Residents have a reasonable need for access by mechanically propelled vehicles to land in which they have an interest.</p> <p>4.2 The County Council has no proposals to carry out structural engineering improvement works along any sections of this way.</p> <p>4.3 Appendix 4 of the report provides the outcome of a site risk assessment of this way undertaken in 2014. The assessment concludes that the topography of the terrain along sections of the way is too steep to allow four wheel vehicles to pass safely.</p>

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<p><b>Ref. 5</b></p>	<p><b>County Council Countryside Access Officer</b></p> <ul style="list-style-type: none"> <li>Byway Open to all Traffic (BOAT) 57/78 connects to BOAT 57/74 near Ty Gwyn farm (see attached plan). By imposing a prohibition of driving Order on the whole length of 57/74, 57/78 becomes a dead-end route which is likely to create problems where vehicles using it will be forced to turn back. If the northern portion of BOAT 57/74 could remain open to all traffic then BOAT 57/78 can remain a through route.</li> <li>Given the poor provision of 'off road' vehicular routes in the County of Carmarthenshire, the original proposal to prohibit 4x4 traffic but allow motorbikes (a decision based on surface conditions/suitability) may be more appropriate in this instance.</li> </ul>	<p>5.1 The extent of BOAT 57/78 is indicated on Appendix 5. The proposed prohibition of driving order for BOAT 57/74 provides an exemption for pedestrians, horses, cyclists and residents living along the Byway. Residents using vehicles to access properties along BOAT 57/74 may travel along BOAT 57/78 for the purposes of access.</p> <p>5.2 In 2015 the County Council advertised its proposals to introduce a prohibition of driving order for this way, with exemption for use by motorbikes. There was a strong consensus in the responses to the consultation that motorbikes could pose a risk to the safety of pedestrians using the way and be harmful to livestock, in fields adjoining the way, and environmentally damaging to the fields accessible from the way. Based on the responses to the advertised proposals the County Council determined that motorbikes should be restricted from using the way.</p>