

Appendix 3 Comments and responses

Ref.	Comments	Response
Ref. 1	<p>Factory Road, and, Rotary Way Pembrey</p>	
	<p>1.1 Resident of Waun Sidan, Pembrey “I am writing to object to these proposals because they are unnecessary and are purely a money making exercise The Council has caused people to park on the verges by introducing a parking meter in the car park by the playing fields. As it has always been free parking these people are refusing to pay and use the verges instead. Anyway, the charge for parking in that car park is illegal as no parking bays have been marked out. There was a judgement in law (R v LB Camden) where it was ruled that Road Traffic Regulation Act 1984 is NOT a revenue raising Act. There has never been a problem with traffic flow along Factory Road and Rotary Roads”</p> <p>1.2 Resident of Pintree Close, Burry Port “I wish to Object to proposals under Schedule 1 relating to Rotary Way, Pembrey and Factory Road, Pembrey. About the only occasion in the past that there has possibly been ‘dangerous parking’ is during the week-end when the Game Fair had used Pembrey Country Park. This is just one week-end out of 52 or less than five days out of 365 in any year. The proposal to introduce ‘Prohibition of Waiting at Any Time’ does seem an excessive sanction at this location which only sees a sporadic increased flow of traffic at certain week-ends during the year (mainly summer-time). It must surely be preferable to have temporary cones along certain sections at this location when ‘high volume of traffic and potential dangerous parking’ is anticipated. This location, the wide area of roadway leading to the former industrial estate, has been used for parking by members of the public intending to use Pembrey Forest for walking, running or cycling. No dangerous parking has ever been attributed to those undertaking these activities. “ “This is completely contrary to the purpose of the Road Traffic Act which says specifically that ‘raising revenue should not be an objective’. (The judgement</p>	<p>Double yellow lines were placed on Rotary Way and Factory Road, to the extents indicated in Appendix 1, at the instruction of the County Council’s Countryside and Coast Manager.</p> <p>A County Council press release issued in January 2016 set out the reasoning given by the Millennium Coastal Parks Manager for the placement of these double yellow lines: -</p> <p style="padding-left: 40px;">“We have had an increasing problem where cars have parked up on the grass verges leading to the entrance of the park causing unnecessary congestion along the route. Due to potential safety implications, we have taken action to restrict parking on these verges with posts and temporary yellow lines. After monitoring the situation closely over the past few months it is clear we still have issues with people parking dangerously leaving us with no alternative but to follow this up with the relevant traffic orders so that these measures can be enforced. In the meantime, we ask all drivers to respect the safety of other drivers and pedestrians in the area. The entrance fee to the park is a small daily charge per vehicle, and allows all passengers to enjoy its wide variety of attractions and natural scenery. The income generated through the entrance fee contributes to the maintenance of the park, as well as any future improvements.”</p> <p>The Council’s Civil Enforcement Officer team have not patrolled (nor enforced) the double yellow lines placed on Rotary Way and Factory Road in 2015.</p> <p>Parking controls made under the Road Traffic Regulation Act 1984 (the 1884 Act) include: -</p> <ul style="list-style-type: none"> • On-street prohibition of waiting and stopping restrictions, loading

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	<p>in R v LB Camden made clear that that the Road Traffic Act is not a revenue raising Act).</p> <p>In addition it is disturbing to lean that Pembrey Country Park / Millennium Coastal Park was told it could proceed with painting such yellow lines without the proper posting of a 'proposal'.</p> <p>Having spoken to a number of people, the only conclusion seems to be that the Council or certain officers have been intent on having 'double yellow lines' at this area circumventing due legal process. This is a serious charge but hope you have some explanation.</p> <p>The proposed waiting restriction for Factory Road / Rotary Way cannot be accepted by the Executive Board of Carmarthenshire County Council and steps must be taken immediately to remove the illegitimate double yellow lines at these locations. "</p>	<p>and unloading restrictions and parking places for visitors, permit holders, blue badge holders, emergency vehicles, taxis, coaches / buses, motorbikes and cycles.</p> <ul style="list-style-type: none"> • Off-street parking places (car parks) <p>The car park areas within the grounds of the Pembrey Country Park, accessed via Factory Road and Rotary Way, are <u>not</u> subject to a traffic regulation order made under the provisions of the 1984 Act.</p> <p>Factory Road is classified as a byeway open to all traffic. Factory Road and Rotary Way serve at the vehicular route to the Country Park. Factory Road and Rotary Way are therefore considered to be situated within a special area in the countryside.</p>
	<p>1.3 Resident of Maenor Helyg, Pembrey</p> <p>"We cannot understand why Carmarthenshire County Council considers that imposing these restrictions would aid road safety and free flow of traffic. The road near Pembrey AFC is wide enough not to block traffic and only leads to a single track road going behind the country park.</p> <p>In our opinion the restrictions along the road near the car park have been placed there for no other reason than to increase revenue by preventing people parking and walking into the Country Park and also to make money from the pay and display car park.</p>	<p>The proposed orders for Factory Road and Rotary Way are considered necessary in the interests of orderly parking management, to avoid danger to persons or other traffic using these roads, and to enhance and conserve the natural beauty of the area. The access road leading to the country park relatively is used by leisure vehicles and caravans. The Order is consider necessary to secure the expeditious movement of traffic.</p>
	<p>1.4 Resident of School Road, Pwll, Llanelli</p> <p>Lines were painted at this location in Spring 2015 extending existing yellow lines along Rotary Way with, as far as we were aware, no public consultation. We consider that the lines are unnecessary and have only been painted by the authority to make motorists pay in the pay and display car park or the pay on-entry Country Park.</p> <p>We also consider that the illegality of extending the lines and the bad-feeling they have caused amongst visitors must be taken into account when deciding whether these lines are to remain permanently or removed.</p> <p>The Road Traffic Act is specific in its guidance to Local Authorities and indicates that the lines are not necessary as</p>	

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	<ul style="list-style-type: none"> ▪ they do not have any significant effect to ensure the expeditious movement of traffic, ▪ there is no significant road safety issue, and ▪ they do not result in an improvement to public transport <p>Nowhere in the guidance is the painting of lines to raise revenue either advised or sanctioned. The judgement in R v LB Camden (expatré Cran) made clear that the Road Traffic regulations Act 1984 is not a revenue raising Act. We, as volunteer botanists use this area to meet like minded plant recorders, with a view to parking vehicles before continuing in shared cars to record the wild plants and vegetation in Pembrey Forest, Pembrey Burrows Local Nature Reserve, and other areas in the vicinity. The resulting records are fed into local and national databases and assist statutory authorities such as Carmarthenshire County Council and Natural Resources Wales in their deliberations regarding such matters as planning, land-use development and biodiversity issues. Our records are made available at no cost to these authorities and there is unrestricted but it is rarely even acknowledged that such information is invariably the product of members of volunteer expert organisations such as BSBI.</p> <p>We oppose the extension of parking restrictions at this location as it impairs our voluntary work thus limiting benefits to the general environment including the workings of your and other authorities.”</p> <p>1.5 Resident of Dan-y-Bryn, Pembrey “Regarding the double yellow lines that have been put down on the road leading to the entrance of Pembrey Country Park before notification to the public. I am against this as I have never seen a problem with parking along this road in the twelve years that I have lived here. Who is going to enforce it anyway? Also I haven’t seen anybody park on this road before lines were put down and I go over there often with my dog. The Council seems quite happy to let cars park on the pavements, along this street. I usually have to walk in the road as cars are parked taking up most of the pavement, so that’s ok then!!”</p> <p>1.6 Resident of The Dell, Furnace, Llanelli</p>	

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	<p>“The present situation in Rotary Way and Factory Road is that double yellow lines have already been painted on these roads. These have been placed for some months. There is no signage defining the specifics of the restrictions. According to the Council Officers these yellow lines have been applied without prior notification as required by the Road Traffic Regulation Act 1984 as amended and Traffic Management Act 2004.</p> <p>The grounds for my objections are threefold:</p> <ol style="list-style-type: none"> 1. The current situation of the County proposing ‘retrospective’ application for amendments to parking restrictions is embarrassing for members of the Council, the officers and employees to say the least. It shows scant regard to procedure by Council officers. It makes a mockery of open government and may even have been illegal. <p>It appears that the Council is attempting to impose these restrictions by stealth. The double yellow lines that are in place are illegal and unenforceable. As such they should be removed immediately.</p> <ol style="list-style-type: none"> 2. The reason for restricting access on these roads is not obvious. <p>The parking restrictions proposed prohibit waiting at any time. I ask why? This is not a motorway or a busy junction or a dangerous roundabout. It is a no-through road that leads to the beach. The roads involved are not busy at 7.00am nor 6pm on a Tuesday in March. The roads have more traffic in summer than winter. So the purpose of total restriction of parking suggests a lack of understanding, a measure of logic or perhaps incompetence. Thus I object on the grounds that they are completely unreasonable and will not provide any benefit to the citizens of the borough.</p> <ol style="list-style-type: none"> 3. The Integrated Parking Strategy for Carmarthenshire 2005 was developed ‘to ensure that parking facilities are safe, accessible and convenient’. Parking facilities does include on road parking and the effect of the above proposal would be to remove perfectly reasonable on-road parking on, what is for all intents and purposes, a no-through road. I object to these proposals because they are directly counter to the Integrated Parking Strategy, which the Council itself wrote and endorsed.” 	
	<p>1.7 Residents of Llys-y-Felin, Llangennech “As INWA Instructors of Wetlands Nordic Walking Group we have often</p>	

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	<p>parked at the beginning of walks in Football Field car park, which until last year as FREE. We are volunteer Nordic Walking Instructors for Age Cymru which is a registered charity. The majority of our walkers are OAP's with little income.</p> <p>The car park used to be free, but the Council saw fit to make it Pay and Display. We would suggest that the problems of 'dangerous' parking which you appear to think exist along Rotary Way and Factory Rd. have occurred as a result of making the once FREE car park into a PAYING one.</p> <p>However having been there on numerous occasions in the past year we have not witnessed the safety implications mentioned by the Council's Rory Dickinson and do not believe there is a need for such restrictions.</p> <p>Moreover it is quiet wrong for the double yellow lines to have been put in place before proper consultation and planning procedures had been carried out.</p> <p>We would move that the double yellow lines are unnecessary and ugly and that forseen parking problems would be drastically reduced by making the Football Field car park FREE once more – hence no need for double yellow lines thus considerably improving the appearance of the entrance to the Country Park.”</p>	
	<p>1.8 Resident of Lando Road, Pembrey</p> <p>“I wish to object to the double yellow lines which have been there since April 2015 on Factory Road and extended onto Rotary Way.”</p> <p>“I can understand double yellow lines on Rotary Way with entrances to the Country Park and the Caravan Club site to be kept clear at all times.</p> <p>It is not busy with traffic a lot of the year.</p> <p>Many people come down to park out on the grass or in the football car park (or used to). They would meet up for running, cycling, walking in the forest or the coastal path, They are there early morning, late afternoon or evening when not many people were about. They did not create a problem with the flow of traffic or safety. As there is no public transport to the park, and 80 percent of the year not enough traffic.</p> <p>When the Game Fair is there the road is managed with traffic cones for 3 days.</p>	

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	<p>The Road Traffic Act states in LA guidance: -</p> <ol style="list-style-type: none"> 1. to ensure the expeditious movement of traffic 2. improve road safety 3. improve public transport <p>The only reason is to enable the CCC to take more money by the Parking metre and pay park entrance fee. This is nothing to do with safety. Road Traffic Regulation Act 1984 is not a revenue raising Act.”</p> <p>1.9 Resident of Pwll Road, Llanelli “I wish to object to the proposed Prohibition of Waiting along Factory Road, Pembrey. This stretch of road is plenty wide enough to allow parking on both sides without causing any obstruction. It is a useful meeting point for friends and colleagues when planning onward travel to either Pembrey Country Park or Pembrey Burrows LNR. (I am personally concerned with both conservation and walking groups). There seems to be little point restricting the parking here except for purely commercial reasons connected with the Park, which would therefore not be a safety concern of the Highways Department.”</p> <p>1.10 Resident of Waun Sidon, Pembrey. “I object to these proposals. They are not necessary and once again money orientated. Anyway it is illegal as there is no parking bays. Also there was a judgement in law R v LB Camden where it is ruled that road traffic regulations act 1984 is not a revenue raising act.”</p>	

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Ref. 2	High Street, Tumble	
	<p>2.1 A resident of High Street, Tumble. “With reference to the above notice . Am I to presume that it will apply to all properties on both sides of Tumble High Street? If so does the council intend to repair the service road that runs to the rear of the said properties ?”</p>	<p>The description of the proposed order for High Street, Tumble, referenced in Appendix 1 of this report, was misinterpreted.</p> <p>The description of the order reads: -</p>
	<p>2.2 Resident of High Street, Tumble “I wish to put my objection to you about the plans to rid High Street of their only Parking, as you know there is nowhere for the residents to park other than on the street. We also have many old and disabled people who rely on their cars, these very from ex miners with lung trouble to pensioners who have family members who are blind, we also have disabled children. So I object to the proposal that has been stuck on one pole in the street.”</p>	<p>“Location: High Street, Tumble</p> <p>Side of road: South</p> <p>Description: From a point 156 metres east of the centre of its junction with Tyisha Road for a distance of 17 metres in an easterly direction”</p> <p>Reference to ‘156 metres’ in the description was understood by the objectors to refer to the length of double yellow lines to be introduced on the High Street.</p>
	<p>2.3 Resident of High Street, Tumble ‘I object to the above parking restriction, at Tumble High Street, in the strongest possible terms. Firstly, there is no good or logical reason for the proposed restrictions. High Street is a wide 2 way street MAIELLO</p>	<p>A written explanation and accompanying plan was sent to each correspondent who objected to the proposals in order to clarify the extent of the proposed restrictions.</p>
	<p>2.4 Resident of High Street, Tumble Petition – “Please find enclosed the objectionable petition drawn up and signed by residents of high street tumble regarding a proposed parking bay between the hours of 0800 and 1900 daily. I myself strongly object to the proposal as my wife is severely partially sighted and relies on our car for transportation.”</p>	<p>The proposals are aimed only at improving visibility for vehicles exiting a side road (located on the south side of the High Street), located between No. 60 and No. 62 High Street. This fact was explained in the written explanation issued to each of those correspondents who objected to the proposed order.</p>
	<p>2.5 Resident of High Street, Tumble “It is with grave concern that it has been brought to my attention the proposal of the parking ban on both sides of High Street, Tumble. I have extreme difficulty as it is to gain entry to my property, if this proposal is carried out it would make my life untenable.”</p>	
	2.6 Resident of High Street, Tumble	

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	<p>"I would like to raise an objection to the Council's proposal to restrict parking on the High Street between the Hours of 0800 and 1700 for the following reasons: -</p> <ol style="list-style-type: none">1. Not all residents have garages or rear parking and there is insufficient room for all the residents to park in the rear lanes.2. There are also security implications – both personal and property safety to be considered.3. If it is proposed that the rear lanes are to be utilised the current entrances / exits are insufficient to carry the extra traffic."	
	<p>2.7 Resident of High Street, Tumble "As a resident of High Street in Tumble SA146HE. I have come home from work today to a letter informing us as a household that the council are proposing to Ban parking on the street. I would like to know what benefit this would have to the residents and to the community. What provisions are being proposed for us to park. There are spaces at the rear of some of the properties but the service road is in much need of repair. Driving on this road will damage all vehicles. Another point to consider is that this will lower the value of the properties and will make it more difficult to sell as new residents will not have anywhere to park. I await your response."</p>	

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Ref. 3	<p data-bbox="237 284 383 308">Trevaughan</p> <p data-bbox="237 320 1171 703">3.1 Resident of Trevaughan “which will cause the removal of parking for residents in the village of Trevaughan. As the owner of a property, this proposal would mean we would no longer have anywhere to park our cars. I understand the concern for safety on the road, but feel that more emphasis should be put on the speed and amount of heavy traffic on this little road. There has been an increase in the amount of heavy goods vehicles such as large low loader lorry's due to one company in particular who have sited business premises on the Ffynnonddrain road after gaining retrospective planning after building an industrial shed to run a business from. This traffic is both dangerous and too large for the Trevaughan and Ffynnonddrain roads.</p> <p data-bbox="237 751 1171 850">If the Council do remove on street parking in the village of Trevaughan where are residents expected to park their vehicles, as the majority of residents are either elderly or have young families and rely upon their vehicles.”</p>	<p data-bbox="1200 320 1240 344">3.1</p> <p data-bbox="1200 357 2107 456">The proposed prohibition of waiting restrictions are aimed at facilitating the safe passage of vehicular traffic at a pinch point in the carriageway and improving the forward sightlines for traffic in both directions.</p> <p data-bbox="1200 469 2107 568">The proposed length of the prohibition of waiting restrictions has been kept to the desired minimum so as to facilitate, as far as it practicable, on-street parking for local residents.</p>

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Ref. 4	<p>Garden Lane, Llandovery</p> <p>4.1 Resident of Broad Street, Llandovery</p> <p>1. The plans indicate parking restrictions are sited at the only section of Garden Lane with a pavement. This is the only safe section of the road to get two children out of a car, and to put further pressure on parking spaces in this section would be impractical and irrational.</p> <p>2. There is no problem with traffic flow on Garden Lane – in fact, traffic needs to be calmed down and slowed along the road, which is mainly used as a short cut to the A 40. Greater stretches of this road cleared of cars would merely allow greater speeds to be reached, which would appear to be against the current thinking in traffic calming policies. There are a number of house entrances (including No. 15 & 16 Garden Lane in close vicinity to this site) whose doors open directly onto the Lane. Increased traffic flow would result in increased speed of cars and greater chance of pedestrian accidents.</p> <p>3. The parking restrictions are proposed in the widest part of the street so would unlikely to impact on traffic flow. The road narrows significantly at the junction with the A 40 so as to only allow one car to easily pass, within only a few metres from the proposed restrictions.</p> <p>4. There is no difficulty in cars exiting the College site the entrance way is extremely wide and allows for ample visibility in both directions, when compared with the width of a standard road junction. Any restriction in visibility is caused by the large stone wall the other side of the entrance way, so that cars by necessity have to creep out of that entrance. The speed at which cars exit or enter the site can have no impact on pedestrian or road safety. This would only be improved by the College introducing pavements or footpaths within their own property, at the Garden Lane entrance. Should that organisation wish for cars to be able to exit their property more quickly in the morning, it should consider a more suitable traffic entrance from the main road and a safe drop off zone at the front of the their main property rather than increasing traffic down a small lane with inherently limited access. Further, and as set out above, the entrance to Garden Lane at the A40 junction is only suitable for one car, so allowing cars to exit more quickly from the site would not ease overall traffic flow along the road and may adversely</p>	<p>4.1</p> <p>Prohibition of waiting restriction exist on the southern side of Garden Lane, for its entire length. The restrictions apply from Monday to Saturday, between the hours of 8am and 6pm.</p> <p>The proposals for Garden Lane are aimed at improving visibility for vehicles exiting a side road onto Garden Lane. The proposed double lines extend for a distance of 12m.</p> <p>The section of pavement situated on the north side of Garden Lane extends for 28m.</p> <p>Vehicles may lawfully stop on double yellow lines for the purposed of loading and unloading.</p> <p>Concerns about the speed of traffic along Garden Lane will be referred to the multi-agency Speed Management Group, in accordance with the County Council’s Speed Management Strategy.</p>

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	<p>affect it.</p> <p>5. There is no entrance way or garage opposite the location of the proposed restrictions. Access to any entrances in that vicinity can and should be reversed into a suitable direction, so as to be able to exit forwards safely into the road. This is confirmed within the Highway Code. As stated above, this is the widest part of the Lane and in comparison with many other rear entrances on the street enjoys easy access, aided by the College entrance opposite.</p>	