

**From:** [REDACTED]  
**To:** [A303 Sparkford to Ilchester](#)  
**Subject:** South Somerset Bridleway Association's response to Deadline 7  
**Date:** 29 May 2019 16:35:39  
**Attachments:** [SSBA deadline response 7 May 30 2019.docx](#)

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Dear Sirs,

Please find attached our response to Deadline 7. If you have any queries, please contact me.

Sarah Bucks

Chair

South Somerset Bridleways Association

## South Somerset Bridleways Association

### Response to Deadline 7

This response is in 7 parts:

1. General comments and compliance with requirements in DMRB (Design Manual for Roads and Bridges) volume 5, section 2 'Process'
2. Public rights of way in verge (schedule 3, part 11 of the draft DCO application)
3. New public rights of way in draft DCO application
4. Opportunities
5. Safety issues and site specific suggestions
6. Questions and legal queries
7. Show stoppers and suggested solutions

#### 1. General Comments and compliance with requirements in DMRB volume 5, section 2 process

1.1 We believe that the DMRB list of categories of paths (1.30) should include restricted byway status, which allows carriage drivers as well as other non-motorised users.

1.1.1 In the glossary of the draft DCO application, the definition of NMU excludes carriage drivers who are vulnerable road users and also non-motorised. Why have they been excluded?

1.2 DMRB, 5.3, states that creation of new routes shall not be restricted to those that can be delivered within the context of the highway scheme.

1.3 We believe that where new routes are connecting into existing routes (both recorded and un-recorded<sup>1</sup>) they should be to the higher status. Thus routes joining restricted byways should be created as restricted byways.

1.4 The Process Management design team should include an assessor who has sufficient knowledge and experience to understand the importance and needs of equestrians<sup>2</sup> which includes:

- Equestrians need safe routes and loops rather than individual routes which terminate at major roads
- Key trip attractions for equestrians are a network of routes comprising bridleways, restricted byways, minor roads and safe crossings of major roads
- Safe routes between villages
- Where there is no over or under bridge, make provision for safe at grade crossings (by installing Pegasus crossings)
- Safe routes near riding stables and livery yards
- Cross county routes/ network
- Parking and space to load and unload horses is a major draw
- Small shops and pubs with safe standing room for horses.

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<sup>1</sup> There are some routes where the historical rights are not recorded on the Definitive Map and Statement. DMMO applications have been submitted for these, which would record existing rights, the applications are not for new rights. We understand from Somerset County Council that there is no intention to process these applications in the foreseeable future.

<sup>2</sup> DMRB volume 5, section 2, part 5 HD 42/17, 2.6

1.5 We have identified and bought several opportunities for improvements to the attention of HE<sup>3</sup>. These will increase the length of safe routes, join up some parts of the existing network, integrate the equestrian routes safely with the local roads, provide alternatives to busy roads, make some at grade crossings safer, and provide safe routes between villages. These opportunities are discussed in part 4 of this response 'Opportunities', along with suggestions for incorporating safety measures.

1.5.1 The Assessment Report should record the list of the opportunities for improvements.

1.5.2 DMRB, 5.18 states that reasons must be explained for not implementing opportunities and recorded in the Review Report.

1.6 There are a number of relevant Definitive Map Modification Order applications which seek to record under-recorded public rights. It would be helpful if Somerset County Council, the surveying authority, could expedite processing these applications.

## 2. Public rights of way in verge

This list is taken from Schedule 3, part 11 of the draft DCO application

2.1 The title only refers to 'footpaths and cycleways in verge', and there are some bridleways in this list.

2.2 In many places horse riders and carriage drivers are being specifically excluded from using verges. Are the scheme designers fully briefed on the law relating to who may legally use a 'footway and cycleway' in verge?

Comments on the list provided:

2.3.1 West Camel footway in verge AN to AO This is alongside the local road (being de-trunked) and so horse riders and cyclists will have to ride on the carriageway. It is within the red line boundary.

2.3.2 West Camel footway in verge AP-AQ – BV This is a new road and roundabout and well within the red line. It should be possible to provide a restricted byway or bridleway for equestrians and cyclists,

2.3.3 West Camel footway in verge AW – AX This is a new road and roundabout and well within the red line. It should be possible to provide a restricted byway or bridleway for equestrians and cyclists.

2.3.4 West Camel footway in verge AR to AV This is a new road and roundabout and well within the red line. It should be possible to provide a restricted byway or bridleway for equestrians and cyclists.

2.3.5 West Camel bridleway in verge AV – AS Although the wording says bridleway, the drawings say footway.

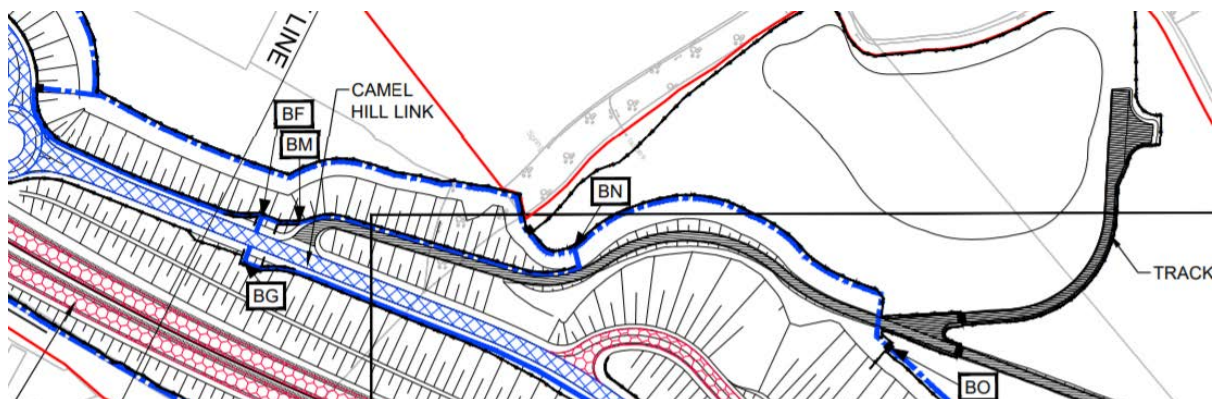
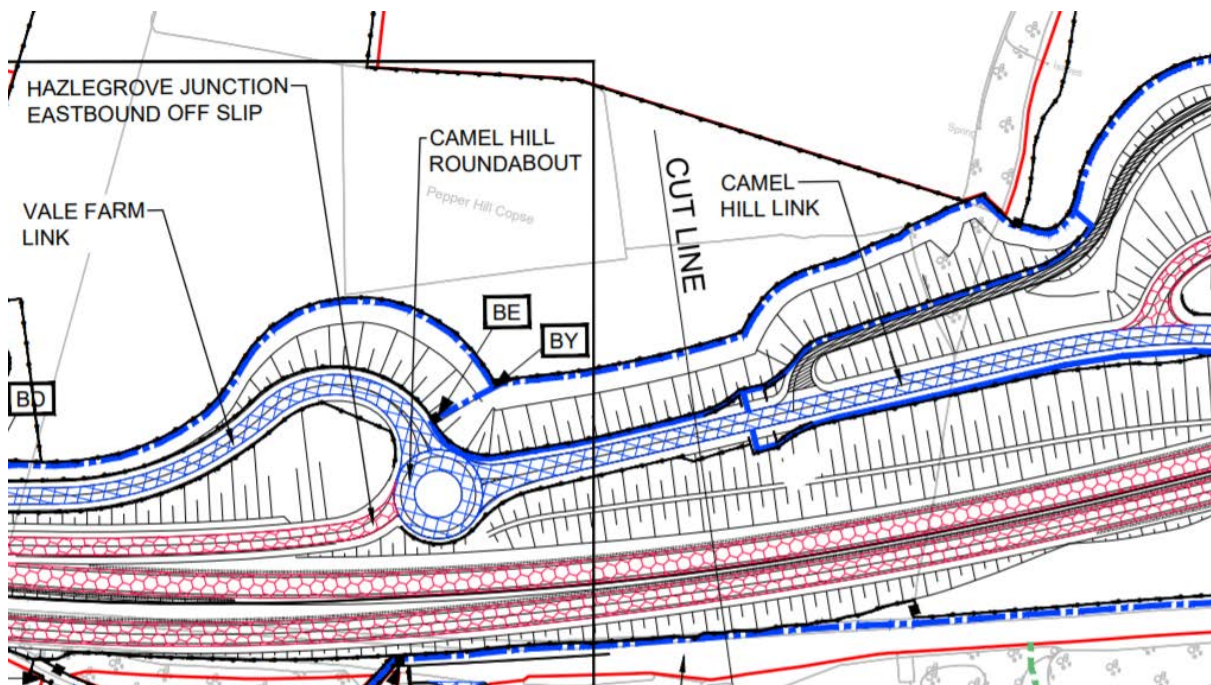
2.3.6 West Camel bridleway in verge AJ – BW this is linking up with a restricted byway (Slate Lane) and should logically have that status.

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<sup>3</sup> As discussed in the DMRB, volume 5, section 2 part 5, HD 42/17, Scope and Purpose', 1.3, 1.4, 1.5

2.3.7 West Camel      bridleway in verge      AB – AK      understood

2.3.8 Queen Camel      bridleway in verge      BE – BF – BM      this is alongside the carriageway, and there is a new public bridleway (BD – BY – BN – BQ – BP) being created a short distance to the north at the bottom of an embankment. Will these two bridleways link together between BE and BY, and also between BN and the driveway access to Hazlegrove School?



2.3.9 Queen Camel      footway in verge      BC to BD      a short section alongside the top of the east bound off ramp. Why are horse riders and cyclists being pushed into the carriageway at this point?

2.3.10 Queen Camel      bridleway in verge      BX – BQ – BH – BG      This is all alongside a new local road and well within the red line boundary; there is no reason why the bridleway and road could not be separated, the bridleway should be further from the carriageway than indicated by a verge.

2.3.11 Sparkford footway/cycleway in verge BT to BU This will put horse riders in danger. Without being able to ride anticlockwise on the southern side of the roundabout, horse riders will have to ride on the carriageway all the way round the Hazlegrove roundabout crossing both the west bound on and off ramps, which would be unnecessary if they were allowed to ride anticlockwise in the verge. See Appendix A

2.3.12 Sparkford footway/cycleway in verge BR to BS This will put horse riders in danger. Without being able to ride anticlockwise on the southern side of the roundabout, horse riders will have to ride on the carriageway all the way round the Hazlegrove roundabout crossing both the west bound on and off ramps, which would be unnecessary if allowed to ride anticlockwise in the verge. See Appendix A

2.3.13 Queen Camel and Sparkford bridleway in verge BK – BJ – BI Good, thank you.

### 3. New public rights of way in draft DCO application

3.1 It is noted that some of the information on new rights of way which may be acquired / created (schedule 5) are not being taken forward. If the MOD (land parcel 7/6a) are unwilling to allow horse riders, consideration should be given to creating a bridleway over land parcels 7/7a and 7/7c, as per the schedule (page 73).

3.2 Are there any other provisional bridleway or other rights of way shown in the draft DCO application which are not now being acquired?

3.3 Route from the southern end of Eastmead Lane to Downhead Lane, AA to AB:

3.3.1 Question: will there be a connection between the new route and the Downhead turning head (at ST 5663 2492 approximately)?

3.3.2 Question: what is the intended status of this route? Eastmead Lane is a definitive bridleway and believed to have restricted byway rights<sup>4</sup>, thus the status should be of the route to be created should be restricted byway.

3.4 ROW in verge AJ to BW, the eastern end of the restricted byway, Slate Lane, at the junction with Steart Hill

3.4.1 Question – what status is this going to be? If it is joining a minor road with a restricted byway it should be of restricted byway status.

3.4.2 This appears to be in land parcels 5/1c and 5/3b. There is no mention in 5/1c of a restricted byway or any other public right of way being created.

3.5 ROW in verge (BD - BY - BN - BO - BP)

3.5.1 Question: what status?

3.5.2 There is an unrecorded route which currently crosses the A303 east of Sparkford roundabout and which joins Hazlegrove Lane<sup>5</sup>. This route, which has higher rights, should be diverted to a safe crossing and the obvious one would be through the tunnel at the

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<sup>4</sup> DMMO application (Definitive Map Modification Order application) was submitted October 2018. This is to record rights which already exist but which are currently unrecorded. It is not an application for new rights.

<sup>5</sup> A DMMO application for this route has been submitted, May 2019.

Hazlegrave roundabout. Thus provision should be made to future proof the design by recording bridleway rights along this route. (see 4.3 below).

#### 4 Opportunities

These suggestions show opportunities to provide safe routes to connect communities.

##### 4.1 Podimore village, via Higher Farm Lane, Podimore to Eastmead Lane, West Camel

It is extremely discouraging to see that bridleway Y 30/29 which was negotiated in 1996 and shown on the maps for years is going to be revoked without consultation. Please can we be given assurances that there will be some route created in lieu. There is little point in user groups engaging with consultations when there is the possibility of the routes that are agreed being revoked later without consultation.

The land parcels connecting Higher Farm Lane with Eastmead Lane (1/1a, 1/2a, 1/3a and 1/3d) are to be acquired and kept on a permanent basis by HE. Therefore they would have the power to dedicate restricted byway rights along the maintenance track (track 1) between Higher Farm Lane and Eastmead Lane, on the south side of the hedge from the bridleway Y30/29. We understand that the rights over Higher Farm Lane overbridge are being considered for upgrading with the use of HE's Designated Funds. There is a DMMO application to upgrade Eastmead Lane from a bridleway to a restricted byway. Eastmead Lane joins two restricted byways and has all the characteristic of a Restricted Byway. We believe the order should be made on the historical evidence produced. Therefore, in order not to have dead end restricted byway, the new route between Higher Farm Lane and Eastmead Lane, assuming there is going to be one, should be of restricted byway status.



##### 4.2 Stear Hill, West Camel to Queen Camel

4.2.1 Either by dedicating bridleway or restricted byway rights along the construction track which is comprised of an enclosed track – and field – which are both in temporary possession without the intention to create new rights (land parcels 5/3d, 5/7a, 5/10a, 5/12a, 5/12b, 6/1a, 6/1c, 6/1d, and also 6/1e where new rights are due to be created).



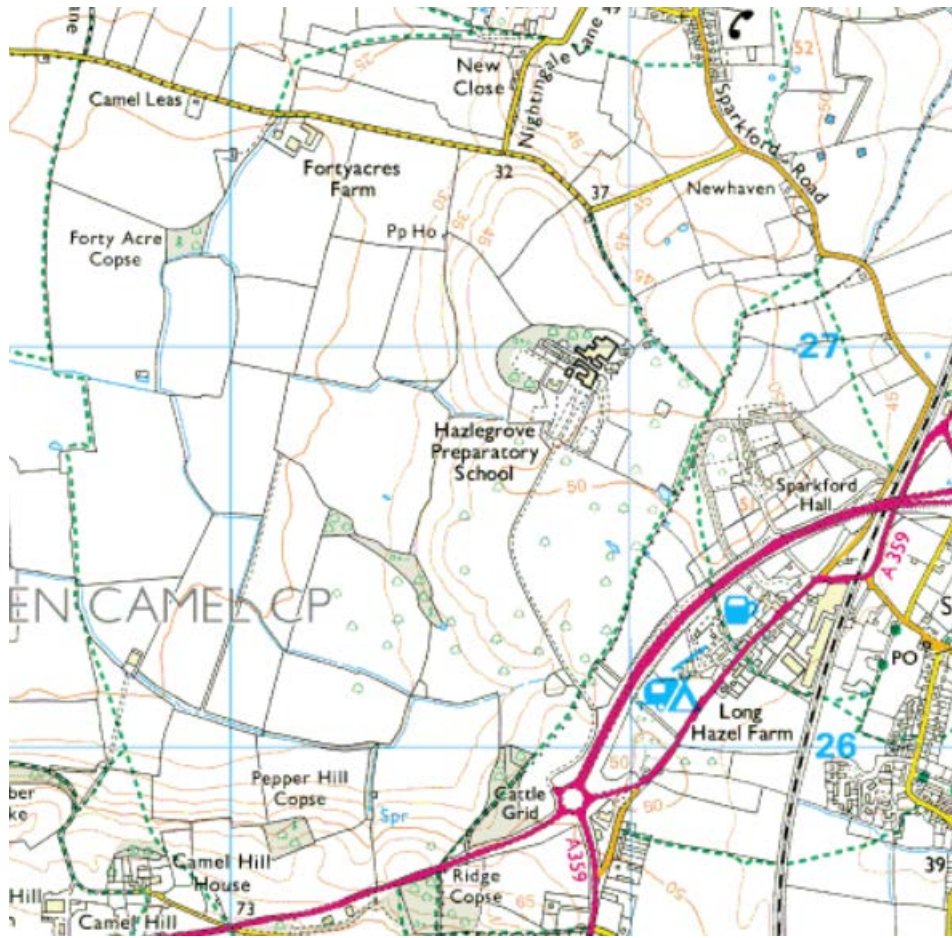
4.2.2 Or, dedicate bridleway or restricted byway rights alongside the northern edge of the eastbound carriageway, which is land to be owned permanently by HE (land parcels 5/d, 5/3e, 5/2e, 5/3g, 5/3a, 5/2f, 5/3h, 5/2g, 5/3k, 5/2h, 5/3g, 7/2a, 7/4a, 7/4b, 6/1f).

4.2.3 We note that a Public Path Creation Order might be an appropriate way of securing the creation of a bridleway or restricted byway rights over private land, and the relevant legislation could be the Highways Act 1980, section 25 for a PPCO by agreement and section 26 for a compulsory PPCO. This would be for the County Council or District Council to make the orders. Compensation would be expected to be paid to the landowner.



#### 4.3 Camel Hill, Sparkford to the county road in South Barrow

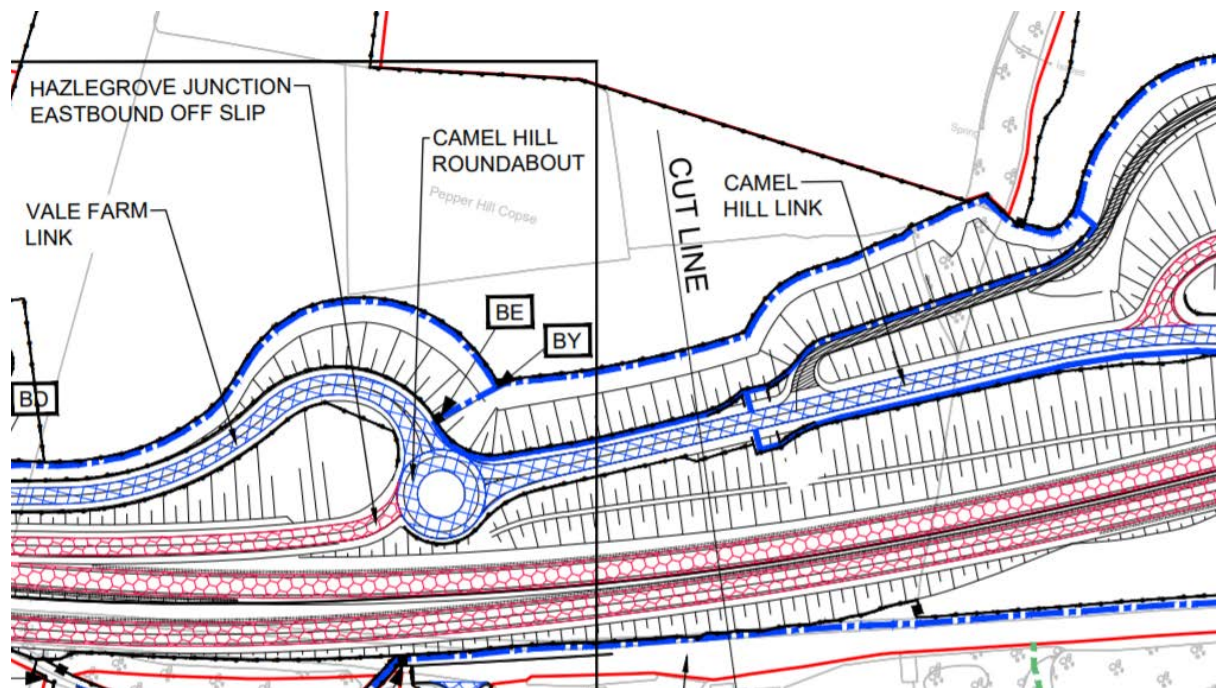
A DMMO application has been submitted for the route which runs from the A359 in Sparkford, across the A303 dual carriageway east of the Hazlegrove roundabout to Hazlegrove Lane, and then northwards and round up to the corner in the county road in South Barrow. The historical evidence includes Quarter Session records and cannot be refuted. Although the surveying authority is unlikely to process the applications for generations, it would be sensible to future proof the design. Therefore the design should include connections so that these routes, with appropriate legal diversions to keep them off the dual carriageways, can be recorded and set out at a later date. Therefore we request that the route from BN to BO to BP and WN 23/12 should be a bridleway.



#### 4.4 Queen Camel

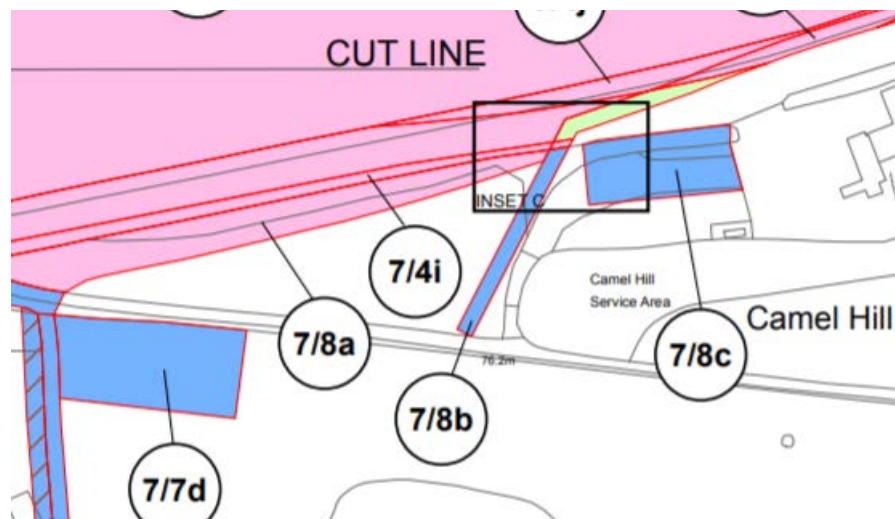
There is a proposed new right of way shown from BE to BY which links the Camel Hill roundabout with the new public bridleway at the bottom of the embankment. The gradient and drainage across it should be considered in the detailed design. Please could we have confirmation that this will be bridleway status, and the detailed design will include simple drainage run off.





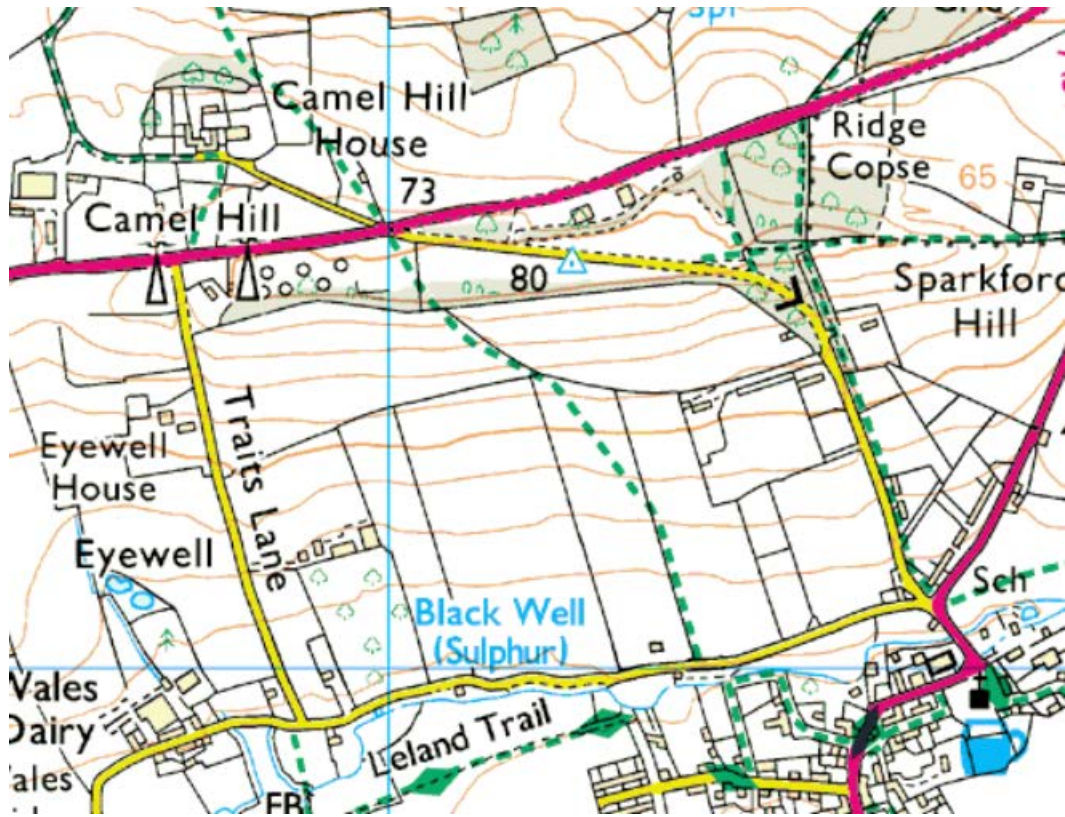
#### 4.5 Old A303 westbound carriageway to Gason Lane (BK to BL) through land parcel 7/8b in Queen Camel.

Please can HE confirm whether this will be a bridleway or restricted byway. The route leads from one minor vehicular highway to another, and so, logically, should carry restricted byway rights. Please can HE confirm that works will be done to clear the route and install a simple system of drainage run offs



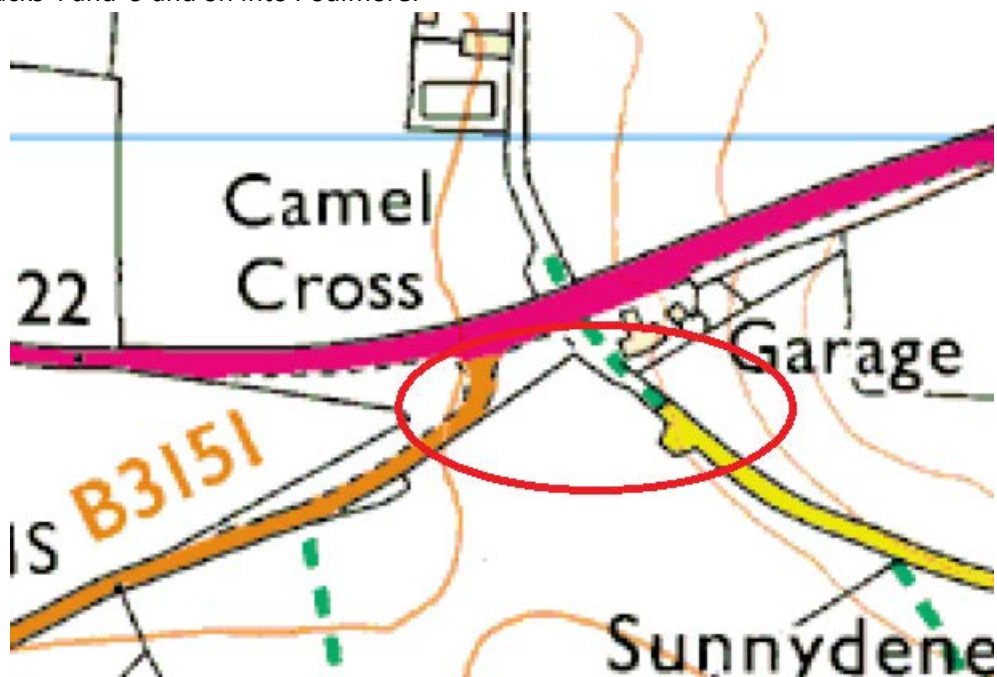
#### 4.6 From north end of Gason Lane to north west end of Traits Lane, Queen Camel

The proposed bridleway within the MOD land is a vital link in the network, and the alternatives are both too long and along lanes which cannot be recommended as they have poor sight lines and in the future are expected to carry more and heavier agricultural supply traffic when the access to the farms from the A303 is stopped up. It is still hoped that the MOD will allow horse riders, and this should be encouraged by all involved.



#### 4.7 Definitive footpath connecting local roads near Wayne's Diner

- 4.7.1 When the old A303 is de-trunked, it will become a local road at ST 5668 2487 (approximately). There is a short section of definitive footpath (Y 27/UN) which, if upgraded to restricted byway status, would allow vulnerable road users to ride from the Sunnydene Farm end of West Camel to join the route which could be provided along maintenance tracks 4 and 9 and on into Podimore.





- 4.8.1 There are two maintenance tracks (tracks 4 and 9) along the south side of the new westbound carriageway and these, together with a short distance of track which will be in the permanent ownership of HE, and goes up to the Podimore turning head.
- 4.8.2 Dedicating restricted byway rights along these maintenance tracks would create a safe route for all non-motorised users away from the B3151.
- 4.8.3 This stretch of the B3151 is straight and serves both the Royal Naval Air station at Yeovilton and the Fleet Air arm museum.  
It must be advantageous to provide a safe off road route on the south side of the new A303 carriageways along maintenance tracks 4 and 9 and extending to the current slip road to Podimore (ST 5541 2498 approximately).
- 4.8.4 The alternative is to ride a kilometre on the straight part of the A3151 in the carriageway with traffic which has just come off the A303 dual carriageway.  
The reason given by HE is that there is a pinch point. Could provision be made to acquire extra land or use the Public Path Creation Order legal process (see reference in 4.2.3 above) to overcome the problem with the pinch point. There is no minimum width for a bridleway, although 3 meters is recommended, a bridleway with a pinch point is better than the B3151.



## 5 Safety and site specific issues

- 5.1 There is a short section of a 'new improved local road' from BC to BD where there will be a footpath in the verge, but horse riders must use the carriageway. This section is alongside the top of the eastbound off ramp and will not be quiet, so why force horse riders off the verge and onto the local carriageway and closer to the traffic?
- 5.2 Safety for horse riders with horses north west of Hazlegrove, ie kept on Camel Hill. If there is no safe route for horse riders around the Hazlegrove roundabout, then the horses kept at Camel Hill stables will not be able to ride out. There are currently no bridleways or restricted byways which will not be accessible without using the tunnel, and then the Hazlegrove roundabout. There would be possibilities of safe routes off this section of Camel Hill north of the A303 if:

5.2.1 The DMMO application routes through the grounds of Hazlegrove House were successfully processed, but we are told that there is no intention to process the DMMO applications at the current time.

5.2.2 a new route was created to join the eastern end of Slate Lane with Camel Hill. See point 4.2 above.

### 5.3 The Hazlegrove roundabout.

5.3.1 The plans show 'footway/cycleway in verge' for two sections on the south side of the Hazlegrove roundabout (BT to BU and BR to BS).

5.3.2 Footways and cycleways exclude ridden or driven horses unless specified.

5.3.3 The only safe designation for the rights to use the verge by all non-motorised and vulnerable road users in both directions is restricted byway.

5.3.4 Unless that is designated, horse riders will have to share the tarmaced carriageway with the motorised vehicular traffic. As equestrians can only, on the vehicular carriageway, keep in the left hand carriageway, follow the direction of traffic flow, and ride clockwise around the roundabout, they will have to cross both the westbound on ramp and the eastbound off ramps.

5.3.5 By creating the 'cycleway and footway in verge', the HE is excluding horse riders from a verge which horse riders could otherwise have used. We have asked that rights to ride horses be added to the verge (see appendix A) but been told that this has been considered and rejected.

5.3.6 If the DCO is granted to allow HE to create a 'cycleway and footway in verge' as stated in the draft DCO application, it will exclude horse riders who will then have to share the tarmaced carriageway with the motorised vehicular traffic and ride the full 360 degrees of the roundabout.

5.3.7 If they were of a mind to, and they say they will not reconsider their decision, HE could use section 71(2) of the 1980 Highways Act to alter the margin so as not to exclude horse riders, and force them onto the carriageway with the rest of the traffic. It is important that public equestrian rights in the verge are for travel in both directions.

5.3.8 Appendix A gives an example of how a similar situation was legally set out in Hertfordshire. It should be noted that the Hazlegrove roundabout is not a 'new build' section, but part of the existing road network.

### 5.4 The junction of the A359 from Queen Camel with the Hazlegrove roundabout.

5.4.1 We have made a request for a Pegasus<sup>6</sup> crossing be installed here. It would serve all vulnerable users and alleviate the problems of the poor sight lines.

5.4.2 HE state that horse riders are slower to cross a road than cyclists and walkers. As an association would disagree with that, horses move faster than walkers, especially when encouraged to do so.

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<sup>6</sup> Pegasus crossings are only activated when a user wishes to stop the traffic. Unless there is such a need, the traffic flow will not be interrupted.

5.4.3 The volume of traffic is not as relevant here as are the poor sight lines, and a Pegasus crossing would be a more practical alternative to a central island corral.

5.4.4 If the designers believe that corrals are necessary, they could be created using some of the land on the verge by the service station, and using some of the old A303 westbound carriageway which is 2 lanes wide at that point. The dead end route up to Matia's Diner does not require two westbound lanes.

## 5.5 Crossing the local road between Plowage Lane and the new Steart Hill overbridge

5.5.1 We have made a request for a Pegasus crossing to be installed here.

5.5.2 This crossing connects vulnerable road users from West Camel, where there is a restricted byway, with the Steart Hill overbridge and onwards to communities north of the A303.

5.5.3 This local road is straight and will be carrying all the traffic bound for Yeovilton and the Royal Naval Air Station. A Pegasus crossing would only stop the traffic when a vulnerable user wished to cross.

## 6 Questions and legal queries

### 6.1 status of NMU rights over Steart Bridge and through the tunnel at Hazlegrove roundabout.

Elevation drawings submitted for both the Hazlegrove tunnel and Steart Hill overbridge (elevation drawings produced July 2018) exclude equestrian routes. They comprise 2.5 metre verge, 7.3 metre vehicular carriageway and a 4 metre wide footpath. The proposal states, schedule 3, part 11, that there will be bridleways dedicated alongside the carriageways on both of these crossings, (Steart Hill crossing AV to AS, and the tunnel BX to BQ to BH to BG) yet the elevation drawings show only footpaths. Assuming that these elevation drawings will be part of the tender documents, will NMU routes be built, or only footpaths? Which will be delivered, and what mitigation is there for carriage drivers?

### 6.2 What is the status between BM and BN? (track alongside the western end of the new drive to Hazlegrove School) It is not on the schedule 3, part 11 list.

6.3 Rights being created over private land: Where land is in temporary possession can and will the authority (Somerset County Council or South Somerset District Council) make Public Path Creation Orders and pay compensation? (To be reimbursed by HE). If so, it could be possible to secure a route for equestrians from the eastern end of Slate Lane to Camel Hill.

6.3.1 Will or must the local authority (Somerset County Council) take on public liability and maintenance responsibility for such newly created routes? Accepting that HE will construct the routes and keep them in repair for the first year after completion and handover, what about future repair and maintenance, especially of the new bridleway surfaces which may take more than a year to become established.

If a commercial (ie rubberised) surface is installed, who will hold the guarantee?

### 6.4 Will new signage for the Hazlegrove roundabout be written as HAZLEGROVE or HAZELGROVE?



## 7 Show Stoppers and Solutions

7.1 Route west from southern end of Eastmend Lane. See item 4.1 above.

7.2 Hazlegrove roundabout. Provision must be made for horse riders to use the verge, in both directions, between the A359 in Sparkford and the entrance to the new underpass. See item 5.3 above.

7.3 Bridleway through MOD land.

7.3.1 Without this, or an equivalent bridleway link, the proposed network is broken. The alternative route is too long and on narrow lanes with poor sight lines and mostly with no verges and cannot be recommended to equestrians.

7.3.2 Suggested possible solutions

7.3.2.1 re-apply to the MOD with a fuller explanation of the importance of this link. The suggestion that the MOD are refusing to allow horse riders on the grounds of security issues as stated at one of the hearings is fallacious. A permissive bridleway would go a long way to solving the problem.

7.3.2.2 Create a bridleway along the land to the south of the MOD and through land parcels 7/7a and 7/7c. (This is shown as a bridleway in the draft DCO application list, page 73)

7.4 Pegasus crossing near the top of Plowage Lane (see 5.5 above).

7.4.1 Without a Pegasus crossing over old A303 carriageway near the top of Plowage Lane, the traffic speed and flow could make the crossing dangerous, in which case another way of reducing the level of traffic should be found.

7.4.2 A solution, very much more radical and expensive, might be to divert much of this traffic elsewhere, such as creating a service road from the Podimore roundabout directly to the Royal Naval Air base at Yeovilton.

Appendix A - an example of including all vulnerable users in verges:

Horse margins

S 71(1): "It is the duty of a highway authority to provide in or by the side of a highway maintainable at the public expense by them which consists of or comprises a made-up carriageway adequate grass or other margins as part of the highway in any case where they consider the provision of margins necessary or desirable for the safety or accommodation of ridden horses and driven livestock ..."

S 71(2): "A highway authority may alter or remove a margin provided by them under this section."

Ordinarily, creating a cycle-footway alongside a carriageway is a simple 'we declare ...' process by the highway authority (done under s.65 HA80) and therefore popular. However, horses are automatically then excluded from the cycle-footway and may be forced into the carriageway. This is of course nonsense and dangerous but many authorities, while appreciating that ridiculousness, will say there is no legal mechanism for including horses. The means is Highways Act 1980 Section 71(2) "A highway authority may alter or remove a margin provided by them under this section."

Careful phrasing of the notice that is the legal event can ensure that horses, cycles and feet are included in the margin. An order was made by Hertsmere District Council (at the time acting as agent for the county council). Communication prior to the order with the council is produced here by kind permission of Dr Phil Wadey and may be copied or adapted for similar situations.

(A proposed cycle track was advertised, the BHS objected because of the exclusion of riders.)

The effect of the proposals would be to create a cycleway along the side of the A41 between the stated points. The Highways Act 1980 ('the 1980 Act') defines "cycle track" in Part XIV:

"cycle track" means a way constituting or comprised in a highway, being a way over which the public have the following, but no other, rights of way, that is to say, a right of way on pedal cycles with or without a right of way on foot.'

Section 75(1) of the 1980 Act empowers the highway authority to vary the width of any footway adjacent to a made up carriageway, and section 65(1) gives the authority the power to make a cycle track in or by the side of a made-up carriageway. Taken together, there is undoubtedly the power to make a cycle track alongside the A41.

Now, by virtue of the definitions in the 1980 Act, the presence of a cycle track would prevent the use of the route by horses. The Society regards this as unacceptable. Two points are of particular relevance.

§ The Department of Transport provided a bridge from Hilfield Lane South over the M1 motorway to the A41 nearly opposite Hilfield Lane. Riders use this bridge and would have to travel a long way round to avoid it. If there were an area of land on which they had no rights, they could not cross to reach Hilfield Lane.

§ Riders in Bushey wishing to reach the Aldenham Country Park do so using path Bushey 35 on the west of the A41 and Bushey 36 on the east side of that road. It is necessary to use the verge adjacent to the carriageway to get over the M1 motorway. If the cycle track is created, then there will be no right for riders to use this length of verge. This route happens to form part of the London Orbital Bridleroute and the Merry Hill Greenway, both of which routes are supported by the Council in Policy M12 of the deposited local plan.

Although these two examples are important, the Society is concerned with the whole of the proposed route. Riders do use other stretches of this route. This allows, for example, horses at Brockley Grange to ride alongside the A41 to get to events at Patchetts Equestrian Centre. The Society does not think that their ability to do this should be removed.

It appears to the Society that there is sufficient room for a cycle track and a verge for riders. The verge should, of course, be further from the carriageway than the cycle track. Section 71(1) of the 1980 Act makes it the duty of the authority to make verges available for the use of riders where needed, and the Council is asked to consider this further. It would be possible for the Council to follow a 'Greenways' approach, like that used for the first part of the Merry Hill Greenway between Bushey and Oxhey. There, a 10m wide path had a 3m wide strip hardened for cyclists. Horses stick to the grass except when it is very wet, when they use the track instead to avoid poaching the grass area. The A41 verge would allow this sort of approach: a grass area and a hardened track, but with legal rights for all across both areas. The Society would be pleased to discuss the possibilities on this further.

The key point is that by slightly adjusting the recitals in the order that will be made, the Council can construct the cycle route it desires yet not remove the right of horses to use the route. I think it is important to stress that the Society is not opposed to the physical works, nor to the encouragement of cyclists using the route: it is the legal methods advertised that would deny equestrian access that cause concern.

The margin is created by means of a notice in the press.