

London Cycling Campaign response to The Royal Parks' Movement Strategy discussion paper

8 July 2019

<https://www.royalparks.org.uk/managing-the-parks/park-strategies/the-royal-parks-transport-and-movement-strategy>

About the London Cycling Campaign

London Cycling Campaign (LCC) is a charity with more than 20,000 supporters of whom over 11,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

This response was developed with input from LCC's borough groups.

General comments on this scheme:

- The principles enshrined in this Movement Strategy are supported – and if translated into schemes will likely vastly improve the amenity of The Royal Parks for everyone, but also improve London as a whole.

Specific points about this scheme:

- The strategy should be aimed not just to increase the amenity of people walking and cycling and otherwise using the Royal Parks while inside them, it should also aim to support users travelling to and from the park moving to more sustainable modes for such journeys, and improving such sustainable modes. Similarly, the strategy should also be aimed at improving the amenity of those who pass through the Royal Parks using sustainable modes. For the foreseeable future, the Royal Parks will be used by many people walking and cycling to avoid nearby main roads for journeys – and this should be designed to be not just possible, but comfortable and enjoyable, without causing conflict to other modes, and in large numbers.
- It is entirely right that pedestrians should be the priority for The Royal Parks. But the strategy should be clearer that cycling should be enabled and encouraged for all ages and abilities of mode user too, and for not just leisure inside the park, but also fitness, health and commuting, covering a wide range of likely speeds and cycle types. This means designing for high numbers of people cycling, to minimise conflict with pedestrians, but also to not create design barriers (such as cobbled speed humps as used extensively currently) that disadvantage or even stop some people cycling in the parks.
- As such, there should be a presumption that cycling is allowed, unless its allowance will be likely to create a significant issue for pedestrians. At present, for instance, cyclists cannot even cycle to the Sports Hub at Regent's Park, despite there being

cycle parking there.

- The strategy's principle 4 is "Our park roads are not intended to be commuter through-routes for motor vehicles. Park roads are primarily for the use of park visitors coming to the parks, not for commuters travelling through the parks. Over time, we will discourage the through-movement of motor vehicles within our parks." Given numerous crises affecting London and its Royal Parks, the principle should not aim to "discourage" through motor traffic but remove it totally.
- As well as a principle to remove through motor traffic, there should be an aim to reduce all motor traffic, through or otherwise, in the parks, as much as possible, including car parking, coach drop-off, deliveries etc. For the medium term, some of these motor vehicle movements will be necessary, some potentially desirable even, but there are many alternative modes of transport for some of these functions the Royal Parks and its stakeholders, business partners etc. should be investigating and moving to use, as well as methods to discourage unnecessary motor vehicle journeys to and from the parks, including charging for car parking.
- Given the crises (climate, air quality, inactivity, collisions etc.) affecting The Royal Parks, its users and London, this strategy should be enacted rapidly. Measures, for instance, to reduce through motor traffic should be designed to ramp up rapidly, and rolled out rapidly to all of the Royal Parks. Reducing through traffic by half, but gaining revenue from what is effectively a charge, for instance, should not be viewed as a long-term success.
- There is very little mention of motor traffic speeds in the Royal Parks in the strategy. While challenging speeding might require an act of Parliament, it is clear speeding motor traffic is a major issue in the Royal Parks, and one this strategy should tackle strongly. Speed limits should be 20mph or below (the City of London is, for instance, opting for a 15mph speed limit on many roads, many other park roads in the UK are 10 or 5mph). And this should be enforced on drivers.
- Speed limits for other non-motorised traffic should only be considered where they represent a clear, evidenced danger to other road users – as drivers already do.
- The ban for commercial vehicles in the Royal Parks should be reconsidered for non-motorised modes.

General points about infrastructure schemes:

- The Mayor's Transport Strategy relies on a growth in cycle trips to keep London moving. This means infrastructure schemes must be designed to accommodate growth in cycling. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use, walking, cycling, then public transport are key.

- As demonstrated by the success of recent Cycle Superhighways and mini-Holland projects etc., people cycle when they feel safe. For cycling to become mainstream and enable all ages and abilities to cycle, a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic is required to/from all key destinations and residential areas in an area. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset.
- Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport modes for return on investment according to a DfT study. Schemes which promote cycling meet TfL's "Healthy Streets" checklist. A healthy street is one where people choose to cycle.
- All schemes should be designed to enable people of all ages and abilities to cycle, including disabled people.
- Evidence from TfL and from many schemes in London, the UK and worldwide shows the economic benefits, including to businesses, to be found from enabling a wider range of people to cycle more. Further evidence shows how cycling schemes also benefit air quality and reduce climate changing emissions, as well as improving resident health outcomes and reducing inactivity, as mentioned above.
- LCC wants, as a condition of funding, all highway development designed to London Cycling Design Standards (LCDS), with a Cycling Level of Service (CLOS) rating of 70 or above, with all "critical issues" eliminated. Above 2,000 Passenger Car Unit (PCUs) motor vehicle movements per day, or 20mph motor traffic speeds, cycling should be physically separated from motor traffic.