

## **London Cycling Campaign response to The Royal Parks Movement Strategy 2020**

16 March 2020

<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 strategy:**

- The Movement Strategy is supported. However it is of significant concern that, following a strong public mandate for the original consultation on principles, the process seems to be weakening outcomes for the parks and that the document is significantly more negative about cycling than before.

### **Specific comments on this strategy:**

- It is marked that "increased popularity of cycling" is listed as a "challenge", alongside "decreasing air quality" and "motor vehicle collisions" rather than an opportunity. If The Royal Parks really does "support cycling as a means of sustainable transport" then it must be stronger in both word, and deed. The entire Movement Strategy document is riddled with negative phrasing around cycling. And the parks themselves are also riddled with anti-cycling infrastructure measures and unnecessary restrictions on cycling that have been repeatedly highlighted to The Royal Parks over many years. If The Royal Parks is to fix the damage this has done to its reputation among people who currently cycle, it needs to do better than this. Some examples of many are highlighted in other points, below.
- There is a stark difference in how people currently arrive at different parks that is not easily explained by accessibility (by public transport etc.). The Royal Parks should be urgently looking at those parks with high mode share of visitors by motor vehicle with the aim of rapidly reducing that. Similarly, The Royal Parks should be seeking to understand why some of their parks, even comparing those in outer London, are much more strongly visited by public transport, cycling and walking, and others far less, and seeking to boost visitor movements by sustainable modes across the portfolio.
- Indeed, explicitly, The Royal Parks should not only be seeking to reduce motor traffic movements through the parks (indeed, eliminate them), but also to reduce motor

traffic movements to and from the parks. This should not just come in the form of proactively supporting and working towards improvements to routes for other modes to and from all parks, but also in the form of a specific motor traffic reduction strategy for each park for visitors, deliveries, and for people working inside the park. As such the vision principle “We will encourage the use of more sustainable ways to access and travel through our parks” should be reworded to say “We will enable more people to use sustainable ways to access and travel to, from and through the parks and actively work to reduce unsustainable motor traffic use to do so.” This strategy should then consider measures to reduce numbers of those arriving by car, coach etc. including considering reductions to car parking spaces, increasing car parking charges, proactively championing increased public transport provision and safe cycling routes in the area, even considering provision of electric carts for less mobile users in the larger parks etc.

- The parks may have “robust regulations that prohibit commercial vehicles, including HGVs, from using the park roads”. But these regulations are clearly failing under the current enforcement regime. If The Royal Parks do genuinely wish to reduce commercial motor traffic using park roads, it must as a matter of urgency begin by ensuring the enforcement regime is made more effective. (Also, the regulations should be amended to enable use of park roads by sustainable commercial vehicles such as cargo delivery bikes.)
- The language on the vision principle of “our park roads are not intended to be primarily commuter through routes for motor vehicles” is weak, and has been significantly weakened since the first engagement document. The principle should be reworded to “our park roads are not commuter through routes for motor vehicles”. Similarly, the text beneath should be changed from “over time, we will discourage the through-movement of motor vehicles within our parks” to “as rapidly as possible, we will eliminate through-movement of motor vehicles within our parks”. Outcome 6 “Reduce the amount of through traffic within our parks” should be renamed “Eliminate through motor traffic within our parks”. It says the parks will be “exploring opportunities to close or restrict park roads to through traffic” and “exploring opportunities to use technology to restrict commercial traffic on park roads”. Again, this language is far too weak. The Royal Parks should not be exploring opportunities, but rapidly closing or restricting park roads to through traffic etc. Similarly, The Royal Parks should not be “considering options to reduce speeds and volumes of traffic” but simply “reducing speeds and volumes of motor traffic, rapidly”.
- Similarly, language for pedestrian improvements needs strengthening. Extra crossing points are necessary – The Royal Parks should commit to not just “identifying locations”, but providing them, as well as reducing wait times at them, and indeed monitoring pedestrian comfort and safety and improving it throughout the parks.
- The initial engagement on the strategy gave The Royal Parks a clear mandate from the public that removing through motor traffic from its parks, and making walking, cycling and public transport the key arrival methods to the parks was important. So

again, on the basis of that mandate, this document should be strengthening its principles, not weakening them as has been done.

- Outcome 4 “Reduce speed throughout our parks” includes “introducing additional physical infrastructure where appropriate”. It is important for The Royal Parks to understand and embrace the fact that many people who cycle use the parks for safe, comfortable and convenient cycling – for a variety of reasons. Commuters ride through parks as valuable routes avoiding hostile parallel road routes; others ride in, to and through the park for leisure and fitness reasons – and this includes a wide range of people and types of cycle. These are all not just legitimate uses of the parks, but should be actively promoted as park uses. As such, any physical speed controls that impact on a significant proportion of cycle users or potential users should be considered and designed with great care – considering narrow road tyres, trikes, recumbents, riders who can’t lift themselves off the saddle, children’s bikes etc.
- Further, the legacy of even fairly recent infrastructure for cycling and walking in The Royal Parks is confused and poor. Much more must be done at crossings and other locations where those walking and cycling are currently mixed. And again, the language throughout this document and The Royal Parks in general should see use of parks for all types of cycling as not just an opportunity rather than a challenge, but indeed promote and seek to increase all types of cycling.
- Outcome 5 “Promote considerate cycling behaviour” includes “we will eliminate cycling in non-permitted areas” raising concerns, again, about ongoing anti-cycling sentiment from The Royal Parks. This highlights the inconsistency of language applied to those cycling compared to other modes. Through motor traffic should be “eliminated”, cycling in non-permitted areas should be subject to enforcement where there are collisions, injuries and/or complaints from pedestrians, and we would also suggest The Royal Parks embark on a rolling programme of reviewing paths where cycling is currently not permitted with the aim of allowing considerate cycling where suitable and possible.
- While it is entirely appropriate that the strategy covers five years, it is absolutely vital, given the climate crisis etc. that The Royal Parks takes rapid, bold action on these issues. Within five years, the parks must feature very different visitor mode share and use of motor vehicles through and in each park.
- It is notable that this Movement Strategy does not refer to climate or the climate crisis once, and air quality and health only in passing. The Royal Parks thus appear drastically out of step with the concerns of Londoners and indeed most green space organisations. This should be rectified urgently not only in this document, but throughout The Royal Parks management and policy structure.

#### **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.