

The Royal Parks amendments to regulations

12 April 2018

<https://www.royalparks.org.uk/whats-on/latest-news/consultation-on-amendments-to-the-royal-parks-regulations>

About the London Cycling Campaign

London Cycling Campaign (LCC) is a charity with more than 40,000 supporters of whom 12,000 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:

These amendments are supported – as they will improve the Royal Parks for the vast majority of users, help achieve the five main stated objectives of The Royal Parks and enable more people to walk and cycle to, from, through and in the parks.

Specific points about the scheme:

- The Royal Parks lists as its five main objectives to “to protect, conserve, maintain and care for the Royal Parks, including their natural and designed landscapes and built environment, to a high standard consistent with their historic, horticultural, environmental and architectural importance; to promote the use and enjoyment of the Royal Parks for public recreation, health and well-being including through the provision of sporting and cultural activities and events; to maintain and develop the biodiversity of the Royal Parks, including the protection of their wildlife and natural environment, together with promoting sustainability in the management and use of the Royal Parks; to support the advancement of education by promoting public understanding of the history, culture, heritage and natural environment of the Royal Parks and (by way of comparison) elsewhere; to promote national heritage including by hosting and facilitating ceremonies of state or of national importance within and in the vicinity of the Royal Parks”.
- Given these objectives, it is clear that The Royal Parks should be discouraging motor vehicle use in its parks as far as practicable and possible, and enabling and encouraging as many people as possible to arrive by more sustainable means.
- The 20mph speed limit is strongly supported for all Royal Parks and roads within them. This should be strongly enforced however, through the use of physical design (ensuring such does not disadvantage those cycling) and/or camera etc. enforcement, rather than relying on police enforcement resources.

- The changes to parking charges are strongly supported, and parking charges should be levied for motor vehicle parking in all Royal Parks. Furthermore, motor vehicle parking in all parks should be progressively reduced, with active travel planning and schemes aiming to replace motor vehicle access over time. Parking charges should be revised upwards to reduce demand wherever demand exceeds supply.
- Given the objectives of The Royal Parks listed above, further amendments should be considered rapidly, as follows:
 - The Royal Parks should only allow necessary motor vehicle traffic access - parks should not effectively form part of the road network. “Through” motor vehicle traffic should be progressively eliminated from the parks by regulation, policy change and/or new infrastructure.
 - As a first step, the ban on commercial traffic should be extended to include taxis and private hire vehicles, which are currently exempt. At the very minimum, the ban should apply to their “through” journeys, following the development of an appropriate enforcement system.
 - Commercial cycle operations (pedicabs, cargo cycle couriers, dockless hire bike operators etc.) are currently banned from operating in the Royal Parks. Such operators (including those using standard electric assist models etc.) should be exempt from commercial traffic bans - as they will help reduce congestion, pollution and other negative effects of motor vehicle traffic across London and inside the Royal Parks.
 - It is noted, however, that operation of commercial cycle fleets in the Parks may require further consideration to ensure these operations do not go against any of The Royal Parks’ objectives or otherwise interfere with cycling and walking access for the general public, the amenity of park users etc. And it is likely some forms of commercial cycle operation (dockless hire, pedicabs etc.) will require further development of their licensing regime, code of conduct policies etc. to ensure they are likely to behave responsibly outside and inside the Royal Parks. (Noting that the current exemption for taxis and private hire vehicles already has impacts on the Parks and park users via pollution, noise, congestion etc.).

General points about cycling schemes:

- LCC requires schemes to 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, 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 mode 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.
- 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.